



Dear Sir/Madam

Forest of Dean Local Plan 2021-2041 Second Preferred Option Consultation

Thank you for consulting with Monmouthshire County Council (MCC) on the Forest of Dean Local Plan 2021 - 2041 Second Preferred Option Consultation. Officers from Monmouthshire County Council previously made comments in response to the Forest of Dean Local Plan Review Issues and Options (31.10.2019) and Forest of Dean Preferred Option Consultation (29.01.21). Our comments on the Second Preferred Option Consultation are set out below.

As a Council we want to be a supportive neighbour and not seek to hinder the needs of the FoD as it plans for future development. We respect its view that its residents' needs are best met by focussing development along the Severn estuary. Nevertheless, our response recognises there is a need to protect the interests of Monmouthshire's communities and the potential impact on Chepstow and surrounding areas therefore needs to be carefully considered.

There is an existing commuter flow of residents from the south of the FoD along the A48, through Chepstow, and on to the M48 as they seek access to Bristol or Newport and Cardiff. This traffic flow adds to congestion on the A48 and the A466 as it approaches the M48, both of which are trunk roads for these relevant stretches through Monmouthshire. Additional development between Lydney and Chepstow will exacerbate existing traffic issues in Chepstow. Without mitigation, it will worsen existing problems at the A48 Hardwick Hill air quality management area, aggravate existing blight and severance, and increase road congestion on the A48, High Beech roundabout and the A466.

MCC will expect that the Forest of Dean Local Plan offers measures which will mitigate the increase in congestion around Chepstow. MCC cannot support the proposed Plan unless it is accompanied by a comprehensive and funded package of transport improvements that avoids aggravating these existing problems.

The integrated package of transport improvements should include:

- A high-quality network of walking & cycling routes that provide excellent links between Tutshill, Sedbury & Beachley and Chepstow town centre and railway station, potentially including a new active travel bridge linking Sedbury and the Mabey Bridge development site in Chepstow. Land is available within that development site for the bridge to land;
- A park and ride railway station east of Chepstow to enable travellers to Cardiff and Bristol to take the train before travelling through Chepstow;
- Improved frequency and reliability of train services (this could link to proposed improvements via the South Wales Metro project). MCC seeks assurances from the Department for Transport that it will work with Transport for Wales to increase the frequency of trains stopping at Lydney and Chepstow. The frequency is currently at most hourly, at times two hourly;

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- A frequent and reliable local bus network linking Tutshill, Sedbury & Beachley and Chepstow town centre and the rail system;
- The Chepstow Traffic Relief Road proposal. Funding from National Highways is required for a traffic relief road from the A48 east of Sedbury across the River Wye to Thornwell in Chepstow and the M48. The estimates that various consultant reports provide indicate a cost of £150 million with 90% of the cost falling on National Highways. MCC is supportive of such a scheme and has reserved a route for such a by-pass through Thornwell. MCC would urge the Welsh Government to match in a proportionate manner funding made available by National Highways. The relief road would be likely to pass through a number of important designated sites. The impact of the proposed route on the River Wye, Severn Estuary European Marine Site and Warren Slade/Parc Redding will need to be fully considered and assessed.

In addition, as you are aware part of the A48 in Chepstow is located in an Air Quality Management Area. As such we request that any proposed development that would have a significant impact on the road network, and thus local air quality within this area should be properly assessed for air quality impact in line with an appropriate methodology and include proposed mitigation to reduce or eliminate those impacts.

Finally, please find detailed comments from internal MCC consultees attached as Appendix 1.

I trust our comments will be given due consideration. We look forward to continuing to work collaboratively with the Forest of Dean as part of our respective local plan processes.

Yours faithfully,

Councillor Paul Griffiths
Cabinet Member for Sustainable Economy
and Deputy Leader

Mark Hand
Head of Placemaking, and
Regeneration, Highways and
Flooding



Appendix 1 Monmouthshire County Council Internal Consultee Responses

Monmouthshire Environmental Health Team – Air Quality

A transport assessment should be undertaken to determine the impact of additional vehicle movements on Chepstow, in particular (but not exclusively) the A48/Hardwick Hill Air Quality Management Area (AQMA).

I would anticipate that an Air Quality Impact Assessment will be required by Forest of Dean, however if the transport assessment identifies that Chepstow will be impacted by a change in Light Duty Vehicle flows of more than 100 22AADT or a change in Heavy Duty Vehicles flows of more than 25 AADT, then an air quality impact assessment should be development for Chepstow and the AQMA.

Both construction phase and operational phase should be considered in the Air Quality Impact Assessment.

The assessment should take into account the cumulative effects both existing and proposed Monmouthshire and Forest of Dean developments on Chepstow and the surrounding areas. Any proposals to minimise traffic and air quality impacts should take into account both Planning Authorities; the ongoing Welsh Government and MCC WeITAG Chepstow Transport Study study into improving air quality and traffic in Chepstow; Monmouthshire's emerging Replacement Local Development Plan; and the Transforming Chepstow Masterplan.

In addition to any specific issues or requirements that such an assessment might require, developments should be required to adopt good design principals that reduce emissions and contribute to better air quality management. The specifics of which will no doubt be covered by Forest of Dean Environmental Health, however with regard to Chepstow, a priority should be given to principles that minimise additional vehicle movements into and out of Chepstow. Any S106 agreements for air quality improvements should be accompanied by detailed proposals to address the issues arising.

Highways

The local Highway Authority (MCC) has concerns regarding the increased development in the Tutshill / Sedbury / Beachley area in particular the 600 additional dwellings in Beachley and its impact on the local highway network in Chepstow and the surrounding area.

The A48 through Chepstow and the A466 Wye Valley Link Road and High Beech Roundabout are trunk roads that fall under the remit and control of the Welsh Government, and it is recommended that the Forest of Dean consult with the Welsh Government Trunk Roads Agency directly due to the routes' lack of resilience and resulting road safety and congestion issues.

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For future developments in the Tutshill/Sedbury/Beachley area, any technical work commissioned (Transport assessment) to assess the traffic and transportation impacts during the Local Plan preparation and later applications stages must consider the cumulative impact of any development in Chepstow and the surrounding area, particularly in relation to road safety and congestion on the A48, A466 strategic network and the immediate local highway network. It is recommended that such assessments also require detailed consideration of the Active Travel Act. Although not applicable in England, attention is drawn to Planning Policy Wales edition 11 with particular regard to the Welsh Government's transport hierarchy in relation to new development which establish priorities in such a way, wherever possible, they are accessible in the first instance by walking and cycling, then by public transport and then finally by private motor vehicles. This includes considering the opportunities to promote active travel journeys in accordance with the Active Travel (Wales) Act 2013.

Any future development, particularly in the Tutshill / Sedbury / Beachley area where development is identified as contributing to the on-going issues with the strategic or local network would be expected to contribute or fund identified mitigation and improvements to ensure that the safety and capacity of the network is not compromised and to promote alternative modes of sustainable transport.

It is also recommended that the development of the Local Plan and future planning applications considers the outcomes of the on-going Transport Study for the Chepstow area with key strategic partner organisations involved as well as Monmouthshire County Council, including Welsh Government, the Department of Transport, Highways England, Forest of Dean District Council, Gloucestershire County Council and South Gloucestershire Council. This is a cross-border study that focuses on Chepstow and its transport connections beyond the immediate region, with consideration for the broader system within which it sits. Consideration of short, medium and long term implications for both the local and regional areas are important, and it's recommended that development of the Local Plan has regard to this Study.

Public Transport

Given the current situation in Chepstow there should be a clear commitment from FOD & GCC & WG that they will ensure that new development *will not lead to any additional traffic in Chepstow*, and that they will *take the necessary measures* to ensure that this will be the case.

Suggest that the following measures should be considered:

- A high-quality network of walking & cycling routes that provide excellent links between Tutshill, Sedbury & Beachley and Chepstow town centre and railway station, potentially including a new active travel bridge linking Sedbury and the Mabey Bridge development site in Chepstow. Land is available within that development site for the bridge to land;



- A park and ride railway station east of Chepstow to enable travellers to Cardiff and Bristol to take the train before travelling through Chepstow;
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Active Travel

From an Active Travel perspective, the housing allocation in Lydney is of concern, this is due to the road link into South England (Bristol etc) being through Chepstow. Current traffic levels in the town are currently cited as reasons people do not use AT and an increase in traffic will exacerbate the problem.

Similarity with Beachley, Tutshill and Sedbury, any increase in housing here will see an increase in motor traffic within Chepstow, without increased Active Travel investment across border (possibly including a new Active Travel bridge across the Wye) and a vastly improved public transport service, including more trains from Chepstow station and better bus links, due to the close arterial road routes accessible only through the town. The Welsh Active travel Act allows for cross border links, with the cooperation of the adjoining local authority, an ongoing cross border action group would be welcomed to start tackling the modal shift in Chepstow and its adjoining “Major villages” which act as extensions to Chepstow town.

We note there are no proposed walking / cycling routes on Gloucestershire’s countryside improvement plan, for any routes from Beachley to Sedbury, Chepstow, see:

<https://haveyoursaygloucestershire.uk.engagementhq.com/cycling-improvement-plan/maps/gloucestershire-countywide-cycling-improvement-plan>

Several suggested projects which would help, include:

[20-11-03-beachley-viaduct-link.pdf \(wordpress.com\)](#)

[Plans submitted to build cyclepath and walkway on disused railway line | South Wales Argus](#)
[Shared use path between Chepstow and Tintern via the railway tunnel | A - B connecting communities](#)



Development in the other settlements would not be perceived as having a major knock-on effect requiring active travel improvements to Monmouthshire.

Landscape/Biodiversity/AONB/Tourism

Public document pack:- (page/para references are taken from the Council report)

- Concern around the impact and scale of development on the intrinsic values of the Wye Valley AONB as well the high valued Monmouthshire landscape that includes AONB and abuts FODDC area. In particular concern is raised about the proposed significant increases in major and minor village in the new housing allocations and the potential impact and change in landscape character and quality of setting.
- Concern about potential impacts of any proposals which may stimulate requirement for a by-pass over River Wye SAC, affecting Severn Estuary European Marine Site and a large part of Warren Slade/Parc Redding. These impacts will need to be carefully considered and assessed.
- 4.5 page 45 (Consultation document Page 22: Table 3):- Major villages from 321 to 907 and other villages 138 to 554 based on a broad approach relating to accessible locations. Not totally clear through documents how that relates to west facing settlements i.e. bounding Monmouthshire and impacts on landscape and settlement character.
- 4.6 page 46 (Consultation document Page 23: Table 4) GI intentions seems to focus on benefits with larger development opportunities. All development should maximise GI benefits.
- 4.6 page 46 (Consultation document Page 23: Table 4) There is no mention of SUDs under policy or policy areas.