Inspector’s Questions, Duty to Cooperate

There appears to be little if any reference in the text of the AP itself to the Duty to Cooperate. Supporting information is provided in the Allocations Plan Duty to Cooperate Keynote of August 2015. However, much of the Keynote is taken up with general background on joint working between Gloucestershire authorities, by means of reproducing the Draft Memorandum of Understanding for Gloucestershire. The Keynote is considerably lacking in detail on the specific strategic and potentially strategic issues arising from the preparation of the AP that should have triggered co-operative arrangements and of the outcome of such contacts. For example, is development at Sedbury/Tutshill and along the A48 corridor, as highlighted by Monmouthshire County Council, a strategic issue? The Planning Practice Guidance (‘PPG’) advises that “Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross-boundary matters”. In order to achieve that, I would hope to see considerably more detailed evidence of cooperation on the AP itself, ideally supported by the actual responses of the relevant local planning authorities and prescribed bodies. In particular, the evidence should highlight any cooperation and responses on the approach taken by the AP to the matter of objectively assessed need for housing, which has been the subject of representations. Can such evidence be provided in an amended document?

Council’s Response

1 This is a supplementary document to Keynote 19, in response to the above questions. There are comparatively few strategic issues for the AP given the fact that the CS is already adopted and the basic strategy of that plan remains in the AP. For the CS consultation and cooperation as required at the time resulted in a Plan capable of being adopted and able to sit within the framework of the other plans in the County. Most of the issues were and are still taken into account through extensive joint working within the County and with consultation where needed on more detailed but still strategic matters. The main case where there is a need for continuing co-operation across the County boundary in relation to a specific issue is that with Monmouth CC. It arises because of the proximity of Chepstow and Tutshill/ Sedbury and is considered in greater detail below.

2 In addition to this cooperation with Local Authorities, there is contact with the various statutory bodies in the form of consultation and liaison. The main bodies concerned are Natural England(NE), The Environment Agency (EA), The Coal Authority and Historic England (HE). Economic development in the FoD is partly the result of close co-operation and joint working with the Local Enterprise Partnership (LEP) and also The Homes and Communities Agency (HCA) who support housing and most importantly the regeneration of the Cinderford Northern Quarter. Although this is outside the AP area it is one of the most important
strands of the implementation of the CS and the more detailed plans it supports (in this case the Cinderford Northern Quarter Area Action Plan).

3 The Strategic Housing market Assessment (SHMA) is a joint work between all of the LPAs in the County. There are recent joint studies of Gypsy and Traveller needs (2013), and there are compatible and up to date OAN (objectively assessed (housing) need) studies. The following outlines the approach to OAN, indicating how the FoDCC approach is compatible with other areas of the County, and is as supplied by the Council’s consultants, NMSS.

NOTE ON REPRESENTATIONS MADE ON APPROACH TO ESTIMATING THE OAN FOR THE FOREST OF DEAN ALLOCATIONS PLAN

1. The approach taken to estimating the objectively assessed housing needs (OAN) of Forest of Dean was based on the National Planning Policy Framework and Planning Practice Guidance (PGG). This:
   a. **Estimated the size and age structure of the population that will need to be housed.** This took as its starting point the ONS’s 2012-based population projections. A review of those projections concluded that future flows into and out of the district from the rest of the UK had probably been underestimated as a result of the ONS having based its projection on flow rates during the period 2007-12, a period which included a deep and long recession. A revised projection was therefore produced based on the flows in the period 2002-12.
   b. **Took a view on how that population will group itself into households.** An analysis of the latest DCLG projections, including the published advice of a national expert in this field, led to the conclusion that the DCLG’s 2012-based household formation rate projections should be used without modification. These were combined with the adjusted population estimate to estimate the number extra households which will need to be housed.
   c. **Made an allowance for properties which will be empty or second homes** to produce a preliminary estimate of the housing requirement.
   d. **Considered whether there were any factors which will not have been reflected in the trend-based population and household projections.** These included:
      i. market signals which might suggest that the local housing market has been under particular stress;
      ii. unmet housing needs or past undersupply which could have affected the trend-based assessment of future housing needs produced by a demographic approach;
      iii. how the assessment of the overall housing requirements relates to the need for affordable housing (i.e. social and intermediate housing); and,
      iv. whether additional housing is needed to ensure that the area can accommodate sufficient workers to support the projected level of economic growth.
2. This analysis was initially set out in the NMSS Report, “The Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold” (the ‘October 2014 NMSS Report’) and then updated in the light of the publication of the DCLG’s 2012-based household projections in February 2015 in a further report, “The Objectively Assessed Housing Needs of Forest of Dean: Update Report, July 2015” (the ‘July 2015 NMSS Update Report’).

3. There has been relatively little comment on the approach adopted to estimating the OAN. The most substantive has been by Barton Willmore on behalf of Gladman Developments Ltd. Barton Willmore have followed a similar approach and there are large areas of common ground between them and NMSS. There are, however, four material points of difference in relation to the estimation of the OAN for Forest of Dean:
   a. The two consultants agree that the projected flows to and from the rest of the UK should be adjusted to reflect the flows during the 10-year period 2002-12 but differ on the method that should be used to make this adjustment. [If further detail is thought necessary here the supplementary proof for Berry Hill could be appended.]
   b. NMSS have used the household formation rates from DCLG’s 2012-based household projections, unadjusted for the whole plan period. Barton Willmore also use the 2012-based household formation rates, however they have adjusted the published 25-44 age group rates upwards so that they arrived at the rates assumed in the DCLG’s 2008-based household projections before the end of the plan period. The basis for the NMSS view is set out in paragraphs 14-19 of the July 2015 NMSS Update Report.
   c. There is a difference between the two consultants as to whether the forecasts for the increase in jobs in Forest of Dean should be used as presented by the econometric forecasters or whether those forecasts should be adjusted (as NMSS believe) in the light of advice from the employment consultants, Nupremis. The approach used here follows that used by NMSS in responding to questions raised by the Inspector examining the Stroud Local Plan and accepted by him in determining the housing requirement for that authority.
   d. NMSS does not believe that market signals justify an increase to the OAN. Barton Willmore argue that an adjustment to the starting point estimate of need in order to address what they consider to be worsening market signals is appropriate but are satisfied that their jobs-led OAN of 406 homes a year will go some way toward addressing and improving the worsening market signals that they have identified and that no further uplift is required. It might be noted here that NMSS put forward exactly the same analysis of market signals in a recent S78 appeal relating to a site in Cotswold. The Inspector rejected the appellant’s arguments for a market signals adjustment.

4. Barton Willmore have also queried the absence of a housing market area assessment of the OAN. The October 2014 NMSS Report included an assessment of the OAN for the Gloucestershire housing market area (the detailed results for Cheltenham, Gloucester and

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3 See paragraphs 25 and 26 of the Inspector’s decision in APP/F1610/W/14/2228762: Land east of Broad Marston Road, GL55 6RG.
Tewkesbury being set out in a companion report published in November 2014). A full re-estimate of the housing needs of Gloucestershire has not been carried out since as:

a. No other authority has asked Forest of Dean to assist in meeting their housing needs.

b. Subsequent analysis for Cheltenham, Gloucester and Tewkesbury has not suggested any change in the housing needs of those authorities that would materially affect Forest Dean. (Those three authorities are the Gloucestershire authorities that have the closest links with Forest of Dean.)

c. Conducting a full re-assessment of the housing needs of Gloucestershire would involve disproportionate costs given that it is thought highly unlikely that it would have any impact on Forest of Dean’s OAN given the previous two points.

4 See An Updated Estimate of the Objectively Assessed Housing Needs of Cheltenham, Gloucester and Tewkesbury, NMSS, September 2015

Neil McDonald, NMSS, November 2015.

4 The OAN is a figure that is compatible across the various Plan Areas, and is also compatible with the figure supported by the Stroud Local Plan Inspector in the recently issued Examination report for the Local Plan (2nd November 2015, PINS/C1625/429/5). In the case of Monmouthshire, there is an adopted Plan that does not have a need for that plan’s needs to be met other than in Monmouthshire. The same applies to Herefordshire.

The FoD has borders or shared interests with other LPAs as referred to in the table below:

<table>
<thead>
<tr>
<th>LPA or Plan Area</th>
<th>Strategic issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cheltenham Borough</td>
<td>Part of Joint Core Strategy area currently under examination. No common boundaries with FoDDC, submitted plan provides for needs of the (JCS) area</td>
</tr>
<tr>
<td>Cotswold District</td>
<td>No common boundaries, no strategic issues, (e mail attached) part of joint working for OAN, GTTSA, HMA. Strategic issues if any raised at Officer Group.</td>
</tr>
<tr>
<td>Gloucester City</td>
<td>No common boundaries, comments as Cotswold, part of JCS area. Consultation and representations made regarding some strategic retail proposals</td>
</tr>
<tr>
<td>Stroud</td>
<td>No common boundaries except across River Severn, part of joint working as Cotswold,</td>
</tr>
<tr>
<td>Tewkesbury</td>
<td>Common boundaries, part of JCS area,</td>
</tr>
<tr>
<td>Monmouth County Council</td>
<td>Common boundaries, adopted Plan and strategic issue identified in respect of A48 and especially development at Tutshill/Sedbury. Otherwise boundaries are between rural areas with similar See attached notes and correspondence</td>
</tr>
<tr>
<td>South Gloucestershire</td>
<td>Adopted CS, major development of Bristol Northern fringe and</td>
</tr>
</tbody>
</table>
significant expansion of Thornbury. Regular consultation and some specific liaison on matters such as Oldbury power Station.

<table>
<thead>
<tr>
<th>Herefordshire Council</th>
<th>Common boundaries, Adopted Core Strategy which does not require allocations in adjoining Plan areas. Protocol and regular consultation. No strategic issues. Consultee for Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malvern Hills District Council</td>
<td>Common boundaries, no strategic issues. Rural areas adjoin with similar compatible policies.</td>
</tr>
</tbody>
</table>

5 A ‘Strategic matter’ is defined in the Act as:

(i) sustainable development or use of land that has or would have a significant impact on at least two local authority areas, including in particular development for or in connection with strategic infrastructure that would have a significant impact on at least two local authority areas.

6 Specific strategic matters that have been identified include development at Chepstow or in the vicinity of, major development at Gloucester, possible nuclear power station at Oldbury. In addition minerals and waste is a subject of continuing consultation.

7 The table above makes clear the nature of the shared boundaries and the nature of these affects the nature of common issues which for the most part are either a matter of co-operation by joint involvement in plan making and evidence gathering, or are local matters of the compatibility of policies. The adopted plans for Monmouthshire and Herefordshire are relevant in this respect.

8 FoDDC and S Glos also involved with other Gloucestershire authorities in consultations re Oldbury Power Station-

County matters
9 (ii) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter.

10 Minerals and waste policies and applications are often strategic and are always the subject of consultation between the FoDDC and GCC. The emerging Minerals Local Plan (MLP) and Waste CS have been the subject of dialogue and especially in the case of the MLP. The FoDDC has made representations about the initial scoping for the MLP and the current engagement will continue as the Plan progresses. GCC have in addition being involved at all stages of the AP process with formal comments and resulting discussions.

11 Local planning authorities are expected to include reference to activities that fall under the Duty to Co-operate as part of their Annual Monitoring Report and to prepare a background paper for public examinations to demonstrate they have fully complied with the Duty to Co-operate (including full details of the process of engagement and cooperation and the bodies involved, along with the outcome of this process, including any agreements secured or areas of non-agreement. This document summarises the steps taken to date in relation to the Plan. Paragraph 156 of the National Planning Policy Framework sets out the strategic issues where co-operation might be appropriate. This encompasses:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

12 For the FoD, under the strategy established by the CS, the following areas of strategic cooperation are appropriate:

Homes and jobs- An up to date assessment of housing needs has been completed and is compatible across the HMA. Further study of likely job changes suggests the needs of the area can be met within it.

Retail, Leisure and commercial- partly covered by employment information above, but also the retail studies which inform the CS. No strategic issues.

Infrastructure- future needs embraced in the IDP- needs identified are local and related to areas proposed for development.

Water supply, waste water flooding etc- no strategic issues, see separate note.

Minerals- Minerals Local Plan. Strategic issues identified and discussions continuing.

LEP

13 LEP- The Local Enterprise Partnership (LEP) are a key consultee although the Council’s involvement has recently been more about joint working to help secure finance than consultation at the Plan stage. The partnership has been consulted at every Plan stage. The key approved elements of the plan’s strategy as outlined in the CS are the subject of joint working. The LEP has supported the successful bids for finance for Lydney (£1m secured) and Cinderford (£3.8m secured), and there are live bids for additional finance especially to support the development at Cinderford. Additional investment to support education is being made and there are for example active skills programmes which engage pupils.

Other Bodies- Key national bodies

14 Throughout the evolution of the Plan, discussions have taken place with the following bodies. Representations have been received and the latest (post submission) situation is summarised below.

| Body                  | Discussions have continued, largely in respect of the possible need for more detailed flood risk assessments and the implications of development on outflows from water treatment works. The current position (Nov 2015) is that a schedule is to be agreed showing changes that the EA consider should be made to the AP in order to have their support. Their latest comments are considered in an |
accompanying document.

<table>
<thead>
<tr>
<th>Natural England</th>
<th>Discussions have continued with NE and the latest position is considered in an accompanying document.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coal Authority</td>
<td>Agreement has been reached with the Coal Authority subject to the addition of notes to accompany the Plan policies where allocations are proposed in areas at risk from past mining activities.</td>
</tr>
<tr>
<td>Historic England</td>
<td>The latest consultation response from HE indicated their support for the Plan, and this is considered in detail in the response to questions in relation to heritage</td>
</tr>
</tbody>
</table>

**Infrastructure Providers**

15 Severn Trent Water (STW) and Welsh Water (WW)

In late 2013 an Infrastructure Development Plan was commissioned for the FoD, on the basis of jointly commissioning plans for the entire County but requiring separate documents for each of the Plan areas. This plan was based on a set of draft allocations for development similar to but not identical to those in the final Submitted AP. It was finally published in early 2015 having been updated alongside the early evolution of the AP. The comments from the consultees however pre-date the last AP consultation and any subsequent discussions. The IDP does however provide a background and context for the infrastructure needs of the FoD. There were a number of issues identified in terms of potential drainage capacity, from both STW and WW but these have now been resolved during further consultation. Some of the sites concerned have received planning permission and others have been the subject of further dialogue following updated comments. The response to the Inspector’s questions re flooding and drainage (question 4) provides details and uses the latest information.

**Annexes**

Notes from Cotswold, for Cotswold DC, Stroud (for Stroud DC) and Tewkesbury re the JCS area regarding co operation.

Meeting notes and copy of representations from Monmouth CC

**From Cotswold DC (October 2015)**

Cotswold

Hello Nigel,
I have looked through our duty to cooperate folder and we do not have any written agreements.

However, in regards to OAN, CDC and FoDDC have worked jointly with on the SHMA, the SHMA update of 2014 and the GGTTSAA and have discussed this issues through the forum of CPOG. To date there hasn’t been any DTC actions between CDC and FoDDC. However, CDC and FoDDC have agreed to procure additional joint OAN work from Neil MacDonald and a SHMA update from Simon Drummond Hay (Autumn 2015). This work is yet to be completed for Cotswold District so I cannot comment on the outcome in terms of duty to cooperate.

Jo

Joanne Billingham
Principal Planning Policy Officer
Cotswold District Council

From Stroud DC (October 2015)

Nigel,

Stroud District Council (SDC) supports Forest of Dean District Council (FDDC) in its work preparing the Allocations Plan.

Both Councils continue to work together across a number of relevant projects, including evidence gathering (developing assessments of housing and employment needs), co-ordinating strategic planning functions (Gloucestershire Economic Growth Joint Committee; Strategic Directors; County Planning Officers Group) and wider partnerships (e.g. Local Nature Partnership; Gloucestershire Homes and Communities Group; Supporting People Core Strategy Group).

All Gloucestershire authorities are currently planning to meet their own needs within their boundaries. SDC has recently received its Local Plan Inspector’s Report which has supported the plans for Stroud to meet its needs within the District up to 2031 and the Local Plan is likely to be adopted on 19 November 2015.

Although Forest of Dean shares a boundary with Stroud District, that boundary is the Severn Estuary and there are no bridges linking the two districts. Travelling distances between settlements within the two districts are significant. These geographical constraints mean that there are few site specific matters where cross-boundary co-operation is required. The exception is the Severn Estuary itself and matters such as flood risk and planning for biodiversity. To address these issues, both Councils are members of the Association of Severn Estuary Relevant Authorities and the Severn Estuary Partnership and meet regularly to co-ordinate planning approaches. SDC has just commissioned a visitor survey to understand better the potential recreational impacts upon the Severn Estuary and would welcome further discussions with FDDC once the findings are established to ensure a consistent approach is taken across the area when planning for future development in the vicinity of the SAC/SPA.
I can confirm that SDC considers that FDDC has satisfied the Duty to Co-operate in its work preparing the Allocations Plan.

Regards

Mark Russell
Planning Strategy Manager
Stroud District Council

Tewkesbury BC, for JCS area re consultation (October 2015)

Hi Nigel,

For the JCS we referenced the Duty to Co-operate schedule that was agreed through CPOG to help demonstrate the DtC with our neighbouring authorities where there wasn’t a significant cross-boundary issues.

You can see our version in our Duty to Co-operate statement submitted to the Examination:


The schedule is at Appendix 5 on page 26. Hopefully it’ll be of use. We could probably update and send around CPOG for agreement again.

Matt

Monmouth CC, recent discussions record and notes received at Plan consultations.

Meeting 6th November 2013

To: MartinDavies@monmouthshire.gov.uk; WATKINS, Brian (Brian.WATKINS@gloucestershire.gov.uk); Martin Quaile; Terry Hale; Gethyn Davies; Terry Hale; Malcom Vine; Keith Chaplin; jamie.mattock@gloucestershire.gov.uk; MarkYoungman@monmouthshire.gov.uk
Cc: Brian Robinson; Roy Birch; Gabriella Kirkpatrick; Diane Harris
Subject: Unclassified: Housing Provision & implications re Tutshill Sedbury & Chepstow 6th November

Dear All,

Thank you for attendance at the above meeting. I have a very brief note below and welcome further consultation on any of the matters discussed. Gethyn Davies who originally requested it considered it a useful meeting and I extend his thanks to all concerned.
The current likely additional housing in the Tutshill/ Sedbury area would include a site likely to be the subject of a planning application very soon for 110 dwellings at land adj Wyedean School. GCC had had contact on transport matters and were in dialogue with the developer’s consultants. The development would only add small percentages to the total traffic and consequently the development is likely to be able to be accommodated without NPPF severe impacts. It was desirable to have more information about the traffic flows in Chepstow and GCC would welcome discussion with Monmouth CC.

Monmouth CC had just completed their development plan hearings and had an allocation for up to 400 dwellings pending and a permission for about 170 in Chepstow on land close to the center and the A 48. In addition there may be other proposals (some unsupported) elsewhere in the town. They welcomed on going discussion re planned development. In addition consideration of the junction at the Station Road was under way and planning of improvements at the station itself. Impacts of planned development were small percentages of overall flows, but the Air Quality Management area on the A 48 also had to be considered. There is a current Welsh Govt consultation on this.

All were mindful of the reliance on the one route through Chepstow to access the M4 and on the planned growth at Lydney and elsewhere which would further increase traffic.

Reference was made to desired improvements at Lydney station and to the need to ensure they are implemented and to the possible improvement of Severn Tunnel junction. Improvements to the rail service (train capacity, frequency and station facilities) would all be supported.

Concern was expressed for the air quality situation at Chepstow and also in Lydney, and although there were no easy solutions both English and welsh authorities were involved.

It was agreed that further discussions were desirable in respect of local (sites at Tutshill for example) and wider (rail improvements etc) issues. GCC/ MCC highway officers were co ordinating their views on development including the Tutshill/ Sedbury site.

**MCC comment re Draft Allocations Plan, 2014**

Local Plan Team, Forest of Dean District Council,

The person dealing with this matter is Martin Davies

Dear Sir/Madam

Re: Forest of Dean Site Allocation Plan

Thank you for your e-mail of 21 July 2014 inviting comments on the Forest of Dean Site Allocations Plan. In response, the following representations are provided. Please note these are Monmouthshire County Council Officer comments.

It is recognised that the levels of development proposed for Lydney and Sedbury/Tutshill have generally already been established through existing commitments, either current planning permissions or as set out in the adopted Forest of Dean Core Strategy. The Council remains concerned, however, about the potential traffic impact from these developments on the A48 through Chepstow, both in relation to traffic congestion and adverse effects on the existing Air Quality
Management Area. The Monmouthshire Local Development Plan, adopted on 27 February 2014, identifies opportunities for 675 dwellings in Chepstow in the period 2011-2021, 325 dwellings on existing commitments and 350 dwellings on a new site allocation at Fairfield Mabey. A large percentage of these dwellings, including, in particular, the new site allocation, will add to traffic on the A48. Managing the traffic impact of the new site allocation will be a major consideration in the assessment of any future planning application for development at Fairfield Mabey and the situation regarding further housing development in the Forest of Dean authority area will need to be carefully monitored.

In this respect, the opportunity to comment on a recent planning application in Sedbury has been welcomed and the Council would wish this liaison to continue in relation to sites listed in Site Allocation Plan should they go forward and subsequently be the subject of planning applications. This would give the opportunity to consider whether any mitigation measures are required as part of any Section 106 obligation for new housing development likely to increase traffic on the A48, including the promotion of public transport measures such as improvements at Chepstow Railway Station (likely to be used by new residents at Sedbury/Tutshill, in particular) to encourage modal shift from the use of the car.

Such concerns would be heightened should housing numbers in Lydney and Sedbury/Tutshill increase over those already allocated. In this respect, it is noted that, while 95 dwellings are proposed in Sedbury in the Site Allocation Plan, there is an existing planning application (currently at appeal) for 110 dwellings on an alternative site. Should this appeal be allowed (or should any other applications for speculative residential development in the area be successful) then this could have a significant cumulative impact on future traffic conditions in Chepstow that would need careful consideration. I hope that these comments are of assistance. If any additional clarification is required then I would be pleased to discuss further.

Yours faithfully

Martin L Davies
Development Plans Manager
Enterprise Directorate

Note of a meeting 18th march 2015 with Monmouth CC

Martin Davies, Kate (DC Planner), Paul (Highways), Monmouth CC

Martin Hillier, Jennifer Jones, Nigel Gibbons (FoDDC Planning, policy and DM)

The meeting had been called to discuss cross border issues especially in relation to possible developments especially at Tutshill/ Sedbury and Chepstow.

Traffic and highways

Responsibility jointly between GCC and MCC but agents for the Welsh Government are responsible for the A48 as it is a trunk road in Wales. Discussions do take place between the various authorities but the complexity of who is responsible for what makes this quite difficult.
Both authorities are concerned for the air quality implications, especially MCC, regarding the issue at Hardwick Hill.

**Public transport**

There are ongoing studies of Park and Ride at Chepstow.

Bus services were referred to and especially in relation to access to Chepstow.

**Health**

The GP provision in T/S is by agreement with Gloucestershire provided from Chepstow.

**Development proposals**

FoDDC Allocations plan allocated land for about 145 dwellings at Tutshill/Sedbury on one site of 110 (adj Wyedean School) and another at Bigstone for 35. In addition there is an appeal pending for up to 126 on land off the Old Gloucester rd Elm Rd. There are other sites which have been the subject of representations, and these could increase the total to over 300.

Monmouth- the allocated site of the former shipyards is allocated for about 350 dwellings but there is a proposal for substantially more (600). The impacts of this are being evaluated, not least the local highway impacts in Chepstow. The former brush factory has consent for 164 dwellings but development which was commenced has stalled.

Specific issues re Tutshill- the current application, now appeal by Gladman for up to 126 dwellings at Gloucester Rd Tutshill had attracted a deal of comment and interest including from local residents groups. Apart from their in principle objections to the development (shared by FoDDC) MCC consider there are deficiencies in health and public transport, and in the highway network which have not been given sufficient weight in the consideration of the application.

**Other traffic issues**

Referred to in connection with the quarry traffic form the FoD, and the general pattern of travel. Development at Lydney was discussed, the maximum having risen slightly due to new permissions.

MCC will consider making representations to the T/S appeal (ref P1530/14/OUT).

Other interested parties not present- Welsh office or highway agents, GCC.
Coleford, Gloucestershire, GL16 8HG

e-mail/e-post: martindavies@monmouthshire.gov.uk
Our Ref/ Ein Cyf: MLD
Your Ref/Eich Cyf:
Date/Dyddiad: 19 May 2015

It is recognised that the levels of development proposed for Lydney and Sedbury/Tutshill have generally already been established through existing commitments, either current planning permissions or as set out in the adopted Forest of Dean Core Strategy. The Council remains concerned, however, about the potential traffic impact from these developments on the A48 through Chepstow, both in relation to traffic congestion and adverse effects on the existing Air Quality Management Area. The Monmouthshire Local Development Plan, adopted on 27 February 2014, identifies opportunities for 675 dwellings in Chepstow in the period 2011-2021, 325 dwellings on existing commitments and 350 dwellings on a new site allocation at Fairfield Mabey. A large percentage of these dwellings, including, in particular, the new site allocation, will add to traffic on the A48. Managing the traffic impact of the new site allocation will be a major consideration in the assessment of any future planning application for development at Fairfield Mabey and the situation regarding further housing development in the Forest of Dean authority area will need to be carefully monitored.

The Council has previously expressed concern about the potential cumulative impacts of piecemeal developments in Sedbury/Tutshill that are coming forward outside the statutory development plan framework. In this respect, it is noted that the site allowed on appeal at Beachley Road, Sedbury for 110 dwellings has now been incorporated as a site allocation, with a further amendment to the consultation draft of the Site Allocations Plan (omitting site AP90 for 50 dwellings), leaving one additional site (AP91) for 35 dwellings. This is welcomed, although it is further noted that there is a current appeal for an additional 126 dwellings at land north of Gloucester Road, Tutshill, Should this appeal be allowed (or should any other applications for speculative residential development in the area be successful) then this could have a significant cumulative impact on future traffic conditions in Chepstow that would need careful consideration.

The opportunity to comment on recent planning applications in Sedbury/Tutshill has been welcomed and the Council would wish this liaison to continue in relation to sites listed in Site Allocation Plan (including potential sites at Lydney) should they go forward and subsequently be the subject of planning applications. This would give the opportunity to consider whether any mitigation measures are required as part of any Section 106 obligation for new housing development likely to increase traffic on the A48, including the promotion of public transport measures, such as improvements at Chepstow Railway Station (likely to be used by new residents at Sedbury/Tutshill, in particular) and enhanced bus services, to encourage modal shift from the use of the car and the mitigation of adverse impacts of further traffic on the existing Air Quality Management Area.

I hope that these comments are of assistance. If any additional clarification is required then I would be pleased to discuss further.

Yours faithfully
Martin L Davies
Development Plans Manager
Enterprise
CPOG- is the County Planning Policy Officer’s Group, GCC Gloucestershire County Council, HMA Housing market Area, which is the County of Gloucestershire, JTC Joint Core Strategy (Gloucester, Cheltenham and Tewkesbury’s joint strategic Plan), MCC Monmouthshire County Council,

FoDDC November 2015