Wyre Forest District Responses to LTP3 Officer Comments for Cabinet Approval 10th January 2011

Document and Section	Page	Issue
The Third Worcestershire Local Transport Plan (LTP3)	Page 12	Inconsistency between the LTP3 Economic Aim "To enhance footfall in Worcestershire's town and city centres, by improving the public realm through resurfacing, regenerating, renewing and de-cluttering our public spaces, and ensuring that use of parking capacity is optimised" and the first bullet point under this objective which relates to strategic traffic and parking management plans which cover entire urban areas. The holistic nature of this doesn't seem totally consistent with the aim itself which as written relates only to town and city centres. Furthermore any review will need to be undertaken in partnership with car parking operators including District Council's and private sector operators. However, Wyre Forest District LDF Core Strategy is consistent with the broad requirements of the aim.
The Third Worcestershire Local Transport Plan (LTP3)	Page 16	1 st Environmental Aim: Suggest that this is caveated to recognise that whilst new road infrastructure should be planned to minimise transport noise it may inevitably bring transport noise which does not currently exist.
The Third Worcestershire Local Transport Plan (LTP3)	Page 19-21	The overall thrust of this Public Health and Safety objective is to be welcomed and supported. However, it has historically been used to support outdated design standards that are often without scientific foundation. The latest government design guidelines in the form of Manual for Streets illustrate a more creative design approach within urban areas. Similarly, this argument needs to be balanced when considering inter-urban highways with the need to maximise the efficiency of movement particularly in the context of strategic routes to markets e.g. the A456 and A449
The Third Worcestershire Local Transport Plan (LTP3)		The aims and objective of the LTP3 are in broad alignment with those set out in the Wyre Forest District Local Development Framework, particular in respect of environment, design emphasis and economic regeneration.
The Third Worcestershire Local Transport Plan (LTP3)	Page 35	From a Wyre Forest District Council perspective it is noteworthy that LTP3 contains a proposal to wait until confirmation of funding before producing the first 'Delivery Plan'. This could introduce a significant element of uncertainty for the Wyre Forest District Local Development Framework and in particular could have an adverse impact on the preparation of the site specific Development Plan Documents. Whilst there are significant uncertainties in the current climate, there are a number of potential delivery mechanisms and funding opportunities and a draft, or indicative, delivery plan should be produced in order to illustrate how the LTP may be implemented. Otherwise the LTP3 seems to be a wish list without any foundation. This does not bode well for forward planning purposes and provides insufficient certainty.
The Third Worcestershire Local Transport Plan (LTP3)	Page 34	In terms of environment issues, the LTP3 makes a sweeping comment about "urban areas becoming more attractive". This observation may apply to the more 'attractive' Worcestershire urban areas. However, the design of streets as spaces within Wyre Forest District urban areas often leaves much to be desired and serves to undermine the attractiveness of the urban areas.
The Third Worcestershire Local Transport Plan (LTP3) – Issues and Challenges	Page 31-37	Other than the above comments the identified issues and options are broadly supported.

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Page 35-40	Whilst there is a section entitled "delivering the plan and prioritising schemes", there is concern at the lack of a more specific (short to medium term) delivery plan. The challenges of developing such a plan are recognised i.e. the uncertainties of funding. It is considered that the delivery planning elements of the LTP3 should look to be more detailed where possible. At present there is only a strategic context to delivery. However, Worcestershire County Council can provide varying degrees of certainty on particular schemes through prioritisation and indicating likely funding sources and options for specific schemes. The authority can also explain its intentions and timeframes for developing specific proposals. The section sets out objectives and weightings for prioritisation which are generally supported. It is understandable that the maximum weighting is given to costs and funding which places the emphasis on schemes which can be funded from sources other than Worcestershire County Council. Whilst this is understood, it may be appropriate to put the emphasis on partnership schemes which bring in significant match funding i.e. schemes that can make the limited amount of Worcestershire County Council funding go further. There is specific mention of a sample scheme to introduce kerbs in order to reduce edge of carriageway pot holes which
	sounds expensive.
Page 45 onwards	The 'Delivery Programme' (from page 45) is presented in a series of packages. This approach is supported. However, as mentioned above the approach outlined is purely strategic. The argument for this is the current uncertainty over funding. However, there are known funding sources emerging including Tax Incremental Funding and Regional Growth Fund. It would also be helpful for Worcestershire County Council to highlight priority schemes and consider a range of delivery mechanism and likely scenarios for scheme delivery. The lack of any greater levels of certainty in respect of commitment to specific schemes could serve to undermine the Wyre Forest District Local Development Framework.
Page 57-61	Wyre Forest District Council support the inclusion of the Wyre Forest Transport Strategy which includes The Kidderminster Urban Package, The Stourport-on-Severn Urban Package, The Bewdley Urban Package and The Wyre Forest Rural Package. The proposals set out here, particularly the Major Scheme Bid for the Hoo Brook Link Road. It is acknowledged that these schemes are "being considered for inclusion" and as such, the Council would strongly support the inclusion of the Kidderminster Urban Package within the Final LTP3. The Kidderminster Urban Package is considered to be essential in achieving the vision, and implementing the policies set out within the District's Core Strategy DPD.
	It is concerning to note that there is no mention of the Stourport Relief Road within LTP3. The route has been safeguarded through the District Council's Core Strategy DPD, and this was supported by the County Council at the recent Examination in Public. It is felt that LTP3 could be better aligned with the Core Strategy given the weight that the document now has.
Page 57	Suggest re-wording as follows:
	The ancient Wyre Forest, from which the District takes its name, can be found to the west of the area. To the North and East the District is largely rural, interspersed with the villages of Fairfield, Cookley, Blakedown and Wilden and a number of rural settlements, the largest of these being Wolverley and Chaddesley Corbett. (This change is to bring the profile in line with the settlement hierarchy set out within policy DS01 of the Core Strategy DPD). The District does not benefit from local access to the motorway network, however, despite this the area has good connections to the Black Country and wider West Midlands Conurbation to the north, and Worcester to the South,
	Page 45 onwards

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		There are congestion issues on Kidderminster Ring Road and its approaches, the A451 Stourport Road, and the A448 between Kidderminster and Bromsgrove.
		Unfortunately, there are two Air Quality Management Areas in the Wyre Forest District
		There is a bus station in the centre of Kidderminster, however, this is poorly located and as a result, underused. Investment will be required
		Wyre Forest District Council recently adopted its Core Strategy, which set out a long-term approach to land use planning in the District. The main theme of the document is regeneration, with the majority of the District's future growth, up until 2026, to be delivered on brown field sites. The launch of the 'ReWyre' project for Kidderminster reflects the aspirations of the Core Strategy for regeneration and growth, focusing on the regeneration of Kidderminster Town Centre (including Churchfields and the Stourport Road Employment Corridor).
The Third	Page 60	Amend:
Worcestershire Local Transport Plan (LTP3) – The Wyre Forest Rural Package		Schemes to improve access to key services and facilities for those that do not have access to a car.
Omission		Reintroduce sections of dual carriageway on the A449 and A456. These roads have both been reduced to single carriageway routes without consultation with the District Council. This has reduced the efficiency and capacity of these critical links and it is suggested that these works serve to further undermine the local economy. Although it is recognised that these works were designed to address safety concerns, it is unclear why alternative options were not considered.
Traffic and Parking Management Policy	Page 6	Paragraph 2.2.2 suggests a Pricing Review to identify the current charges for existing parking capacity and will recommend future pricing policies. Wyre Forest has recently undertaken this exercise and it is considered that this should remain a function of the District Council.
Multimodal Freight Policy	Page 13	The Council would question whether Kidderminster and Stourport-on-Severn are large enough to make Freight Consolidation Centres viable.
Development Control (Transport) Policy	All policies	Consider that the policies within this document should be revised to include thresholds at which they become applicable. It is considered that the extent and volume of information being requested would not be justifiable for modest development proposals and therefore some form of threshold should be clarified.
Development Control (Transport) Policy	Policy DC1 (4 th bullet point)	Raise question over how new development can "seek to reduce the length of trips".
Development Control (Transport) Policy	Policy DC3	Consider that a clear definition of cluster sites should be included.
Development Control (Transport) Policy	Para 2.4.2	Clarification as to how the requirements in this paragraph would work in practice would be welcomed.
Development Control (Transport) Policy	Policy DC7 (3 rd bullet point)	This talks about a 20 year business case. Is this realistic given the current economic climate?