

Miss R. Mayman,
Principal Forward Planning Officer,
Planning, Health and Environment Division,
Wyre Forest District Council,
Duke House
Clensmore Street,
Kidderminster
DY10 2JX

Sustainable Futures

5 St Philip's Place
Colmore Row
Birmingham
B3 2PW
Tel: 0121 352 5482

Your Ref: REM/JD/764.01/439

Our Ref: GOWM/WPT/P5250LDF/54943

Date 6 September 2007

Dear Miss Mayman,

Wyre Forest District Local Development Framework
Core Strategy – Issues and Options Consultation.

Thank you for your letter dated 20 July 2007 and the enclosed documents. I am pleased to have the opportunity to look at Core Strategy Issues and Options Paper. I have discussed the Paper with colleagues in the Government Office and there are a number of general and detailed comments which need to be made.

From the "Introduction", you appear to appreciate the new approach to the preparation of the Local Development Framework and its role in "place making". However, I am concerned that the Paper does not clearly identify the important broad issues and options which are appropriate for a core strategy. The document is set out, identifying a series of topics and specific questions, in a way which would have been more appropriate to an "old style" local plan. The Core Strategy should consider the key issues facing the District, identified through the spatial portrait, from evidence gathering and early discussions with stakeholders. Spatial options should then be drawn up to set out ways in which the issues can be addressed. I am concerned that the Paper will lead to a concentration on topic areas and very detailed matters which in turn would lead to the production of a DPD which is more like a local plan than a core strategy. Consequently a further Paper may need to be developed, taking into consideration responses from this period of public involvement, which can address the key issues and options. There is a need to look critically at the topic chapters to identify what are key elements of the spatial portrait, the issues and options.

I am also concerned that some of the questions raised relate to the role of the Core Strategy and some question national policy. This together with the open nature of many of the questions may not be helpful in focussing on the key issues facing the District. Examples are question E3 “How can the Core Strategy help to improve access to a network of green spaces within the urban areas of the District?” or Question H12 “Do you agree that specific sites for gypsies and travellers be identified within the District’s Local Development Framework?” With regard to the former, if this is a key issue, options should be set out to deal with the matter. On the matter of site provision for gypsies and travellers as you have stated Government guidance indicates that sites should be allocated. The Core Strategy should set out criteria for the location of sites which will be used to guide allocations in relevant DPDs. It could also identify broad locations if these are identified through the assessments.

With regard to the more detailed comments, I consider that the “Spatial Portrait” is a reasonable start. However there are sections from the introductions to the topics which could be included to give a fuller picture. This would have to be balanced with keeping the portrait relevant succinct and leading to the identification of issues. More should be included about health and social matters.

It is useful to have a Key Diagram and the one included in the Paper shows the context of the District. More use could be made of diagrams to illustrate the issues and the spatial options.

The Spatial Vision is a good starting point which can be developed through the preparation of the Core Strategy. By the time the Core Strategy is submitted the Spatial Vision should be a statement of what Wyre Forest District will be like in 2026. This should identify what is locally distinctive about the District, removing the need for specific paragraphs on local distinctiveness. The vision and how the key issues are to be addressed should be brought together to develop the strategy.

The Spatial Objectives need to be more related to what the Core Strategy can contribute to achieving the vision. They should relate more to positive action rather than relate to “encourage”, “support” or “promote”. There is a danger in defining the objectives that it can set out the strategy, particularly if there is too much detail.

Whilst implementation and monitoring are important elements of the LDF system, there is no need to consider them in detail at this stage. The consultation should concentrate on issues and options. It appears that some of the statements made in the “Implementation” section are in fact issues such as redefining the roles of areas in and around Kidderminster Town Centre or the problems of congestion in the Stourport Road Employment Corridor.

On the question of implementation, as the Core Strategy is developed there will need to be greater consideration of the relationship with the Sustainable Community Strategy and the role of Local Area Agreements in delivery.

Finally, there are a few detailed comments on issues. There is concern that there should be more consideration of building safer communities. Although, as stated in the Paper, Wyre Forest District is “relatively safe” and their numbers are small the rate of increase in some crimes such as common assault are giving cause for concern.

The Core Strategy should take into account the needs of an aging population structure as well as those of young families. It will also need to make clear that any proposed mix of house types applies too the rural as well as the urban areas. Links should be made with between the urban and rural economies and developing new businesses in the rural area. Also on rural issues, there needs to be a recognition of the importance of public transport to non-car uses and the potential need for alternatives to be considered.

On transport generally, I note that the schemes and issues you have referred to are in line with the Worcestershire LTP. Some of them require working with partners and may be over ambitious. In developing the Core strategy, you will need to show how the schemes relate to the Core Strategy and how they will be delivered.

These comments are intended to be helpful, however there are some critical issues which I would like to discuss with you. I would be grateful therefore if you would contact me to arrange a meeting to go through the major concerns.

Yours sincerely,

Mike Price
Senior Planning Manager.