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Dear Karen

**Bridgnorth District Local Development Framework
Core Strategy – Issues and Options Consultation.**

Thank you for your letter dated 18th October 2007 and the enclosed documents. I am pleased to have had the opportunity to look at the Core Strategy Issues and Options Paper. I have discussed the Paper with colleagues in the Government Office and have included these comments in the response. However, I have noted your acknowledgement that you may not proceed with the Core Strategy in the light of the Unitary Status for Shropshire. Consequently the comments included in this letter are at a general level.

From the "Introduction", you appear to appreciate the new approach to the preparation of the Local Development Framework and its role in "place making" and have set the scene well. However, I have concerns relating to the District profile and recommend that it is further developed away from the current format which appears to be a list of facts rather than a spatial portrait. You may wish to reconsider including a Vision at this stage as it should be developed drawing from the spatial portrait/issues that are highlighted at this stage in the process. The Vision should set out what the District will be like, setting the context for the strategy, drawing on the spatial portrait/issues highlighted. The current vision does not appear to include these and therefore is not locally distinct enough for a core strategy. When read it could relate to anywhere in the country.

It is difficult to see clearly what the Key Issues are. In some cases they appear to relate to mechanisms such as developing an approach so the delivery of affordable housing rather than the spatial issues facing the District. This also applies to the options that are highlighted in the report. They tend to be topic based and do not appear to form the basis for developing a spatial 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. 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.

It is also unclear as to what stake holder involvement there was in generating the issues and options, for example it is not clear whether the PPG17 assessment was undertaken to identify issues in the Open Space, Sport and Recreation chapter.

I am also concerned that some of the questions raised repeat national policy which is not necessary, for example protected species is a given and are suitably protected with National and European policies there is therefore no need for further policies in this area.

To finish on a positive note it is good to see design being considered with its relation to sustainability highlighted and to see affordable houses, gypsy and travellers provision mentioned as a strategic objective. It is also commendable that you have included the Gypsy and Travellers Accommodation Needs, although we would need to see the results of the GTAA to see where a need arises and then what suitable land can be made available.

These comments are intended to be helpful, however there are some critical issues which I would like you to consider in any future preparation of key documents. Depending on progress towards a unitary authority in Shropshire, it may be necessary to develop spatial options further and carry out additional consultations with key stakeholders and the public. I would be happy to discuss the matter with you.

Yours sincerely

Mike Price
Senior Planning Manager.