

Trafford Core Strategy Examination

Regional Centre and Inner Area Boundaries

Peel's comments on TBC's Proposed Changes to Key Diagram and Chapter 2 Text in response to the Point 1 of the Inspector's Note re Matters Arising from Hearing Session 1 (CD12.53.2)

This note sets out Peel's comments on the changes put forward in the Council's draft changes in CD12.53.2.

Figure 1 – we support the proposal to illustrate the boundaries of the Regional Centre (RC) and Inner Area (IA) on the Key Diagram

Figure 4 – we support the proposed deletion of Figure 4

Paragraph 2.11 – the additional wording proposed appears to suggest that it accurately reflects what RSS says about what the Regional Centre comprises but it does not do so. We object to the term "recognised" as, in our view, RSS as part of the development plan goes much further than this. We also consider that the text to be included in paragraph 2.11 should use the same wording as is used in RSS Paragraph 10. 6 which states that the Regional Centre "**comprisesTrafford Wharfside and Pomona**" Island (note that RSS uses the term Pomona Docks but this would not be consistent with all the other references to Pomona in the Core Strategy and we therefore consider that "Pomona Island" is to be preferred).

Paragraph 2.13 – again the additional wording appears to suggest that it accurately reflects the wording of RSS but here the change from the actual text is more marked and of more concern. Again we object to the use of the word "recognised" for the same reasons set out above and consider that there is no basis in RSS for the Council to adopt the words "would include land in north Trafford and Trafford Park". Again we would propose that the wording adopted should accurately reflect what paragraph 10.6 of RSS actually says which is that, within Trafford, the IA "**comprises of Trafford Park and North Trafford**"

Peel is content that the references in both 2.11 and 2.13 should record that RSS does not or did not define a precise boundary for either the RC or the IA.

General Comment

Peel considers that the careful choice of words for this additional text is important and goes beyond mere semantics. This is because of the position that has been reached in the discussions of these matters at the Examination Hearing which we consider is as follows:

1. The Council has acknowledged that it has not consulted upon any other options for the RC and IA boundaries nor published any evidence base to justify any of the options that might have been considered.
2. There is no published evidence base to support the proposed boundary of the IA that is set out in Figure 4 of the draft RSS
3. It is established that the only statutory document within which the RC and IA boundaries are currently defined in words is in the adopted RSS and that this was subject to full consultation and examination before it was adopted.
4. That it is agreed that it is not appropriate for the council to rely upon the housing figures and other matters within RSS but to ignore or vary other elements of the document as it sees fit.

CD12.53.2 indicates, under the heading “The Council’s Response”, that the Council accepts that the detailed boundaries shown in Figure 4 should be deleted from the Core Strategy and that the detailing of these boundaries should be deferred to be dealt with via the Allocations DPD. The proposed text changes are then introduced as providing a “sufficiently developed framework” within which to produce possible options through the Allocations DPD. Peel contends that there is already a “sufficiently developed framework” in place in the form of RSS and that there is no need for the Council to create its own.

N.B. These comments are related only to the suggested changes as set out in CD12.53.2. Should the Council choose to progress with a new stage of consultation on options for the RC and IA boundaries as discussed in the Hearing Session held on the 7th March, Peel reserves the right to comment both on the scope and substance of that exercise and to make further representations at the appropriate time.