

# Proposed Submission Version Local Plan

## PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

**Name of person completing the form:** Robert Henry Sabberton

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	-
<b>Agent name (if applicable)</b>	-
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	[REDACTED]
<b>Postal Town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

GB1 Warrington's Green Belt

2. What does your comment relate to? Please select one option.

A specific paragraph number (s)

**If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).**

4.1.10 and 3.1.10

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Compliant with the Duty to Co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

My comments are related to the earmarking of green belt land to meet housing targets. The National Planning Policy Framework para 74 states that "Green Belt boundaries should only be altered in exceptional circumstances and be fully evidenced and justified" I believe the Plan does not achieve this with sufficient rigour.

Comment no.1

The treatment of "flexibility" is biased towards the development of Green Belt in para 4.1.10. Flexibility is argued to be required to cater for variability in land supply which can only refer to urban land. However, without explanation, flexibility is incorporated by inflating the housing demand number. A 10% reduction in urban land availability, would result in that land being allocated from our Green Belt so reducing green belt requirement to 4082. Also a 10% increase in urban availability would reduce the Greenbelt requirement to 1724. I consider this is a more logical treatment of Flexibility and in both scenarios would reduce the expectation and need to develop within the Green Belt. Therefore it is essential to keep the availability of brownfield land under constant review to ensure that Green Belt development is kept to an absolute minimum.

Comment no.2

The plan is focussed towards the housing requirements related to the development of Warrington. However it is well known that a significant proportion of housing in Green field areas such as Lymm is bought by purchasers whose jobs are outside the Borough. This effect has not been addressed in the plan other than in par 3.1.10 which highlights the problem but offers no solutions. The outcome is that the current residents of the Warrington will, in effect, lose Green Belt to accommodate the needs of neighbouring Boroughs. This highlights the need to more understand this effect otherwise it is not possible to "fully evidence and justify" the exceptional circumstances where Green Belt will be irrevocably lost.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

This fully explained in my response in Para 4

You have just completed a Representation Form for GB1 Warrington's Green Belt.

Please select what you would you like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**