
A 'Critical Friend' Analysis of Warwick District Council's Draft Green Belt Assessment

Consultation Report

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River Avon

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Introduction

The purpose of this report is to provide a ‘critical friend’ analysis of Warwick District Council’s Draft Green Belt Assessment. This is a partial Green Belt boundary review, which has considered NPPF Green Belt issues around the main settlements within Warwick District as part of their Core Strategy evidence base. The analysis will consider whether the methodology is robust, with particular reference to:

1. The Evaluation Methodology
2. Green Belt Assessment Pro-forma(s) for selective land parcels

Recent Green Belt Planning Policy Background

The new National Planning Policy Framework came into effect on 27th March 2012 for the purposes of plan making and planning decisions. The NPPF replaced over 1,000 pages across 44 documents, with around 50 pages. Its aim is to make the planning system less complex and more accessible to people and communities, to protect the environment and to promote sustainable growth. The main part of the document is sub-divided into 13 sections concerned with ‘delivering sustainable development’ including: supporting a prosperous rural economy; **protecting Green Belt land**; and conserving and enhancing the natural environment. The Ministerial Foreword to the Framework states:

*“Our natural environment is essential to our wellbeing, and can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. **Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.**”*

The NPPF includes a ‘*presumption in favour of sustainable development*’ that seeks to embrace economic, social and environmental objectives in a balanced way and refers to the ‘*guiding principles*’ in the UK Sustainability Strategy – *Securing the Future*.

It recognises the ‘*intrinsic character and beauty of the countryside*’ and encourages the reuse of land that has been previously developed (brownfield land), provided that it is not of high environmental value. The diversification of agriculture and other land-based rural businesses is supported and the value of the ‘best and most versatile

agricultural land' (grades 1, 2 and 3a of the Agricultural Land Classification) is acknowledged.

The Government reaffirms that it attaches great importance to Green Belts and its fundamental aim to **prevent urban sprawl** by keeping land permanently open, with the essential characteristics being their **openness and their permanence**. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. It should consider the **consequences for sustainable development** "of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary" (paragraph 84). The five purposes of Green Belt remain unchanged from the previous Planning Policy Guidance on Green Belts (PPG2). As with the previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It highlights that within Green Belts, Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife.

Valued landscapes should be protected and enhanced; looking for net gains in biodiversity and establishing coherent ecological networks that are more resilient to current and future pressures, including wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation. For example, the Warwickshire, Coventry and Solihull Habitat Biodiversity Audit Partnership (HBA) and the on-going research into habitat connectivity, opportunity mapping and Nature Improvement Areas, will be particularly important in this context. The Framework is also seeking to prevent the loss or deterioration of irreplaceable habitats, including Ancient Woodlands and aged or veteran trees. **Areas of Tranquillity**, which have remained relatively undisturbed by noise and are prized for their recreational and amenity value, should also be identified and protected.

The Sub-regional Warwickshire, Coventry and Solihull Green Infrastructure Study, will be an important document in helping to ensure that the natural environment is fully integrated into the plan making process. Today's scale and pace of change requires a different approach to the traditional ways of providing Green Infrastructure. Previously, it has often been developed at a local level and in an opportunistic way. At times, this has led to schemes failing as insufficient resources have been committed to aftercare. In order to achieve sustainable communities, Green Infrastructure must be planned strategically and delivered in an integrated way across the whole of the Warwickshire area and at all spatial planning levels. The principles of Green Infrastructure should also be integrated into Local Development Frameworks, including Green Belt sustainability appraisals and management plans.

Paragraph 179 of the NPPF emphasises that the **duty to co-operate** plays a critical role in the planning process. It is the mechanism for ensuring that **“...strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans.”**

Department for Communities and Local Government Housing and Growth Statement (6th September 2012)

In the Statement, the Rt Hon Mr Eric Pickles, MP Secretary of State for Communities and Local Government, writes: “The Coalition Government’s number one priority is to get the economy growing. We must create the conditions that support local economic growth and remove barriers that stop local businesses creating jobs and getting Britain building again...”

The Green Belt is an important protection against urban sprawl, providing a ‘green lung’ around towns and cities. The Coalition Agreement commits the Government to safeguarding Green Belt and other environmental designations, which they have been in the new National Planning Policy Framework. The Localism Act allows for the abolition of Labour’s Regional Spatial Strategies which sought to bulldoze the Green Belt around thirty towns and cities across the country, subject to the **Strategic Environmental Assessment** process, as outlined in my Statement of 3 September 2012, Official Report, Column 5WS.

As has always been the case, councils can review local designations to promote growth. We encourage councils to use the flexibilities set out in the National Planning Policy Framework **to tailor the extent of Green Belt land in their areas to reflect local circumstances.** Where Green Belt is considered in reviewing or drawing up Local Plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations... **There is considerable previously developed land in many Green Belt areas, which could be put to more productive use.** We encourage Councils to make best use of this land, whilst protecting the openness of the Green Belt in line with the requirements in the National Planning Policy Framework...”

With reference to the examination of Rushcliffe Borough Council’s Core Strategy exploratory meeting on 31st January 2013, the Inspector gave further thought to the examination and how it should be progressed. The Inspector’s letter states:

“As you know, my principal concern is that the submitted Core Strategy is not consistent with the National Planning Policy Framework’s (NPPF) aim to boost significantly the supply of housing, and meet the full, objectively assessed need for market and affordable housing... It has been suggested that, once the Regional Plan is revoked, and having regard for the importance of localism, the lower housing

target for Rushcliffe will be acceptable. I consider that to be too simplistic; soundness requires the housing numbers to be justified i.e. *"the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence"* (NPPF)...

The Core Strategy has significantly reduced the planned sustainable urban extensions which were put forward in the Regional Plan to contribute to the growth of this major city... However, Rushcliffe has not undertaken a strategic review of the Green Belt in its area, to consider whether all parts of it meet national policy aims and purposes, or to check whether the Regional Plan's proposed urban extensions or alternatives would provide most appropriately for sustainable growth. This is a potential weakness because earlier studies had indicated that Green Belt land south and east of Nottingham was the least sensitive to new development." (Warwick District Council will need to be mindful of this reference, in the light of any recommendations in the earlier Joint Green Belt Study 2009, which may conflict with their Green Belt review.)

In a letter to Mr Crispin Blunt MP dated 19th March 2013 (copy attached), the Rt Hon Mr David Cameron, MP the Prime Minister, writes:

"My support for Green Belt is a matter of public record. A Green Belt boundary can be altered only in exceptional circumstances, through the Local Plan process, with local consultation and robust examination of any proposed changes. The National Planning Policy Framework also asks local authorities to plan to meet assessed local housing needs in full where ever possible. Evidence of housing need (and any evidence about windfall sites) should be gathered locally, and put forward for consideration at examination... while we all want to see more on brownfield sites – it may be necessary to build some on greenfield sites. That is for local authorities and communities to decide and highlights the importance of having an up-to-date Local Plan in place... A local authority must ensure it considers all options when preparing its Plan, especially where there is large housing need that, as matters stand, will not be met. It is up to the authority to decide what course to take, but it will be expected to balance all relevant considerations, including any compelling case for Green Belt review. It will also need to demonstrate at examination that the Local Plan has been positively prepared, is justified and consistent with national policy."

The letter goes on to say that "if no up-to-date- Plan is in place, the presumption in favour of sustainable development would apply. However, the Framework makes clear that the presumption would not apply if specific policies – such as those protecting Green Belt – indicate that development should be restricted. The presumption therefore does not 'trump' Green Belt policy."

**TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 78
APPEALS BY THE RONALD WILSON TRUST
SITE AT HAWKESBURY GOLF COURSE, BLACKHORSE ROAD, EXHALL,
COVENTRY
APPLICATION REFS: 031405 & 031950**

The above response from the Prime Minister to Mr Blunt MP is consistent with paragraph 14 of the NPPF and recent appeals that have been recovered by the Secretary of State's determination, involving significant development in the Green Belt on the edge of Coventry. This included a marina and proposals for residential development. The Secretary of State's decision letter dated 14th November 2013 stressed the importance of the development plan and concluded that:

"The Secretary of State has carefully considered the Inspector's conclusions at IR 11.73 – 11.78 and the balance of considerations in this case. He agrees that there would be substantial harm to the Green Belt through inappropriateness and other harm - particularly reduction in openness, the failure of the proposals to comply with the Green Belt's purposes of checking unrestricted sprawl, and safeguarding the countryside from encroachment. He has therefore gone on to consider whether there are other considerations which clearly outweigh the potential harm to the Green Belt which provide the very special circumstances needed to approve development in the Green Belt.

The Secretary of State agrees with the Inspector that harm of some weight would result from an increase in reliance on journeys made by private car. He also agrees with the Inspector regarding the degree of positive weight to ascribe to provision of a marina at this location, the agreed absence of a 5 year housing land supply, the provision of affordable housing, the ecological benefits and the conclusions of recent studies. However, for the reasons given above the Secretary of State places less weight than the Inspector on the new open space, foot and cycle paths, and the provision of allotments and a community building. Whilst the Secretary of State considers that the decisions are very finely balanced, in both cases he considers that the benefits would not clearly outweigh the harm to the Green Belt and other identified harm."

"Green Belt considerations apart, the Secretary of State sees considerable merit in both the appeal proposals. Whilst he considers that the decisions on both appeal proposals are very finely balanced, he considers that in both cases the benefits do not clearly outweigh the harm to the Green Belt and other harm, as set out at paragraphs 31-32 above, and therefore that there are no very special circumstances that would justify the inappropriate development in the Green Belt. He therefore concludes that there are no material considerations of sufficient weight which require him to determine the application other than in accordance with the development plan."

Re: Strategic Environmental Assessment of the Revocation of the West Midlands Regional Strategy

On 24th April 2013 the Secretary of State laid in Parliament a Statutory Instrument to revoke the Regional Strategy for the West Midlands, which came into force on 20th May 2013.

See the written Ministerial Statement at:

<http://www.publications.parliament.uk/pa/ld201213/ldhansrd/text/130327-wms0001.htm#13032734000011>.

The Ministerial Statement also mentions the Government are revoking the remaining, outdated county-level structure plan policies in the region.

The Regional Strategy for the West Midlands (Revocation) Order 2013 (S.I. 2013/933) is available at:

<http://www.legislation.gov.uk/all?title=regional%20strategy%20revocation%20order>

The 'Strategic Environmental Assessment of the Revocation of the West Midlands Regional Strategy: post adoption statement' and associated Environmental Reports are available from:

<https://www.gov.uk/government/consultations/strategic-environmental-assessment-about-revoking-the-west-midlands-regional-strategy-environmental-report>.

Examination of the Coventry Local Development Plan – Core Strategy Preliminary Hearing Session concerning the Duty to Co-operate

With reference to co-operation within Warwickshire, paragraphs 15-17 explain that “the Coventry, Solihull, Warwickshire Association of Planning Officers has produced a Draft Statement of Common Ground and Co-operation for the Coventry, Solihull and Warwickshire Sub-region (SOCG). This has been signed by the Chief Executive Officers of the Warwickshire Council and endorsed by members of the Council and of North Warwickshire District Council. The intention is that it will also be endorsed by members of other Warwickshire Councils. Solihull Metropolitan Borough Council did not participate in drawing up this statement and will not sign it... However, as with the representations from Birmingham City Council, it does send a message that co-operation in this matter has not been entirely constructive. Indeed Nuneaton and Bedworth are of the opinion that while the SOCG identifies matters of cross boundary interest it does not resolve them.” This view is shared by the Inspector in his conclusions (paragraph 50).

Paragraph 28 goes on to explain that “Warwick District Council, which now shares Group Manager of Planning and Building Control/Head of Development Services with the Council, prepared a SHMA using the same consultant as the Council. The housing figures which emerged from this were derived from population projections and not from the West Midlands Integrated Policy Model, although that model was the basis for one of the projections in the SHMA. Since then further work has been commissioned in connection with a major planning application proposing up to 14,000 jobs and this work does make use of the West Midlands Integrated Policy Model. Warwick District Council is now looking at the evidence base for its plan with a view to incorporating this evidence.”

In his conclusions (paragraph 46), the Inspector emphasises that “The duty to co-operate plays a critical role in the planning process. It is the mechanism for ensuring that, to use the words of paragraph 179 of the Framework “...*strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans.*” The importance of this role is emphasised by the severity of the sanctions which apply if this duty is not discharged – in other words the Plan would be found unlawful and there would be no remedy for this.”

In paragraph 54, the inspector concludes that the Plan does not meet the legal requirements of the 2004 Act in that the Council has not engaged constructively with neighbouring local planning authorities on the strategic matter of the number of houses proposed in the Plan and consequently it has not sought to maximise the effectiveness of the plan making process.”

Paragraph 4.1.1 of Warwick District Council’s Revised Development Strategy 2013, explains that the Planning Inspector appointed to examine Coventry City Council’s Core Strategy has recommended that the City carry out a Joint Strategic Housing Market Assessment (Joint SHMA) with its neighbouring authorities, specifically Warwick District, Rugby Borough and Nuneaton & Bedworth Borough Councils. This will help to ensure that housing growth in the sub-region is considered strategically and all needs are met. The first stage of the study will report in August 2013. For the purposes of this consultation exercise, therefore, the Council is adopting an interim level of growth of 12,300 homes between 2011 and 2029. This may be revised pending the findings of the Joint SHMA and the resulting co-operation between the authorities.

National Planning Practice Guidance (August 2013)

The Government has recently launched its National Planning Practice Guidance in response to Lord Taylor’s review of planning guidance. His report concluded that the current system, comprising more than 7,000 pages of guidance, is “no longer fit for purpose”. At this stage, it is an online preview of the new streamlined planning guidance set to be rolled out later this year, and is intended as a ‘user friendly’ web-

based tool, to help boost community involvement and bring more clarity to the planning system.

The Guidance supports the National Planning Policy Framework and is currently in [Beta](#) for testing and comment. The draft planning practice guidance has not yet been finalised and it is not yet clear whether the Government will consult on future amendments to sections of the online guidance. Existing guidance will not be cancelled until the new planning practice guidance is published in its final form. The site and draft guidance site is currently available for comment and [feedback](#) during Beta, which lasts until **9th October 2013**. The draft guidance includes a section on **Protecting Green Belt Land** and restates the wording in Section 9 of the NPPF on Protecting Green Belt Land (paragraphs 79 - 92) without providing any further guidance. The online guidance resource is available at:

<http://planningguidance.planningportal.gov.uk/>

Forest Heath Strategic Environmental Assessment (SEA) Test

In March 2011 there was a legal case involving Forest Heath District Council which emphasised the importance of the **Sustainability Appraisal** in the decision making process: The outcome was that parts of the Forest Heath Core Strategy were quashed following a High Court Challenge:

<http://www.bailii.org/ew/cases/EWHC/Admin/2011/606.html>.

This judgement ruled that the plan had not been prepared in compliance with the European SEA Directive with implication that may extend beyond the Sustainability Appraisal process, raising wider issues for the steps that need to be followed to successfully adopt a plan. The key points appear to be:

- The Sustainability Appraisal must present an accurate picture of **what realistic alternatives exist and why they were not chosen**.
- The Sustainability Appraisal must refer to, summarise or repeat the reasons for rejecting alternatives earlier in the process.
- The reasons for selecting and rejecting alternatives must still be valid.

Selective relevant quotations from the Forest Heath Judgement:

“In order to form an identifiable report, the relevant information must be brought together; **it should not be necessary to embark on a paper-chase in order to understand the environmental effects of a proposal**. Depending on the case it might be appropriate to summarise earlier material, refer to it or repeat it... it cannot be assumed that all those potentially affected would have read previous reports.” (Paragraph15).

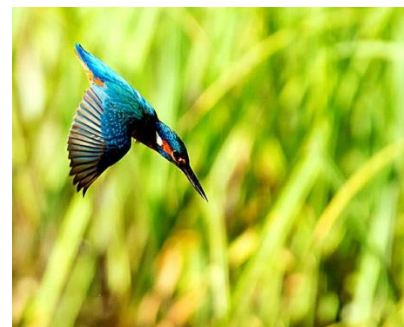
“It is open to an authority to reject alternatives at an early stage of the process and assuming that there is no change of circumstances, to decide that is unnecessary to revisit them. That is what the Council did in this case. But the claimants submit that it has not in any of the SEAs which it produced, given its reasons for deciding to reject the alternatives and that in any event it has failed properly to refer to the necessary information so as to enable the person affected to find it.” (Paragraph 16)

“public consulted must be presented with an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option (See Commission Guidance Paragraphs 5.11 to 5.14). Equally, the environmental assessment and the draft plan must operate together so that consultees can consider each in the light of the other... that does not mean that when the draft plan finally decided upon the authority and the accompanying environmental assessment are put out to consultation... there cannot have been during the iterative process a prior ruling out of alternatives. But this is subject to the important proviso that reasons have been given for the rejection of alternatives, that those reasons are still valid if there has been any change in proposals in the draft plan or any other material change of circumstances and that the consultees are able... to know from the assessment... what those reasons are.” (Paragraph 17).

"The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as:

- (a) biodiversity;
- (b) population;
- (c) human health;
- (d) fauna;
- (e) flora;
- (f) soil;
- (g) water;
- (h) air;
- (i) climatic factors;
- (j) material assets;
- (k) cultural heritage, including architectural and archaeological heritage;
- (l) landscape; and
- (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l)."

(Paragraph 14)



Warwicksire Kingfisher

CPRE & Natural England Green Belts: a greener future'

In a joint report published by the CPRE and Natural England in 2010, the following public aspirations for the West Midlands Green Belt were identified.

Asked what Green Belt activities they would like to undertake in the next twelve month, the public in the West Midlands most commonly chose:

- visiting Green Belt land on a day out with family and friends;
- visiting Green Belt land to get peace and quiet; and
- jointly, visiting Green Belt land to keep fit and visiting Green Belt for another leisure activity or purpose.

When asked what they would like to see more of in the Green Belt, the public in the West Midlands were keen to see:

- nature reserves
- woodland walks
- new parks

71% of the public in the West Midlands agreed that they would buy food known to have been grown or produced by farmers in the Green Belt local to them, rather than buy food produced elsewhere.



Green Belt winter landscape

1. The Evaluation Methodology

It is clear from the new National Planning Policy Framework and the preview of the National Planning Practice Guidance, that the Government attaches considerable importance to simplifying and clarifying the planning system and making it more accessible and understandable to people and communities. In this context, one of the criticisms of some Green Belt boundary reviews in the past is that the technical process may have become unduly complex and often difficult for the public and members to comprehend. This is particularly true when extensive matrix scoring systems are introduced, often involving a plethora of factors and constraints, and including subjective value judgements, which may not always be supported by the local community. The public then need to be presented with an appropriate strategy, considered against reasonable alternatives, with explanation as to why they were not considered to be the best option, based on proportionate and robust evidence.

Clearly change is part of a 'living' Green Belt countryside and rural diversity, but that change needs to be managed sensitively if we are to conserve what is best in our landscape, wildlife and cultural heritage for future generations. This approach is not based on polarisation - natural landscape good; development bad - but far too much development in the countryside is still insensitive to its location in terms of siting, materials and design, and is apart, rather than part of the countryside.

In carrying out a partial Green Belt boundary review, Warwick District Council will need to clearly justify why certain parcels have been chosen, particularly where the recommendations may differ from the 2009 Joint Green Belt Study. In this context, it is important to emphasise that the fundamental aim of Green Belt is to **prevent urban sprawl** by keeping land permanently open; the essential characteristics are **openness and permanence**, and it has **five main purposes** as set out in paragraph 80 of the NPPF. Its designation, review or continued protection is not concerned factors such as the quality of the landscape, biodiversity and nature conservation, the grade of agricultural land, flood risk, archaeological interests, or promoting public access. These may all be very important attributes of the Green Belt and of sustainability, but they are not necessarily relevant to its designation, review or continued protection. However, once a Green Belt has been defined, local planning authorities should plan positively to enhance the many beneficial uses of the Green Belt. These attributes will also be important considerations when assessing whether an area is suitable for an urban or village extension, in order to plan for sustainable patterns of long-term development, as expounded in the NPPF.

Green Belt boundaries should only be altered in 'exceptional circumstances' through the preparation or review of the Local Plan. When reviewing Green Belt boundaries:

- Local planning authority should take account of the need to promote sustainable patterns of development;

- They should consider the consequences for sustainable development of channelling development towards urban areas **inside** the Green Belt boundary, towards towns and villages **inset** within the Green Belt, or towards locations **beyond** the outer Green Belt boundary;
- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep **permanently open**;
- Where necessary, identify areas of **'safeguarded land'**;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;
- Define boundaries clearly using **physical features** that are readily recognisable and likely to be permanent, such as roads, railways, watercourses (canals, rivers and streams) mature natural field boundaries, woodland edges and topographical features such as ridgelines; and
- Only include a village in the Green Belt if it makes an important contribution to the **'openness'** of the Green Belt.

The Government encourages councils to tailor the extent of Green Belt land in their area to reflect 'local circumstances' and emphasise that there is considerable previously developed land in many Green Belt areas, which could be put to more productive use, while protecting 'openness'. **Openness is not defined, but it is commonly taken to be the absence of built development.** There is also a duty for adjoining local authorities to co-operate in the planning process, to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans.

Warwick District Council is currently preparing its Core Strategy in accordance with Government requirements and co-operating with its neighbouring authorities in the preparation of a Joint Strategic Housing Market Assessment (SHMA), which will help to inform the Core Strategy. Government guidance and the enduring status of Warwickshire's Green Belt indicate that adjustment of Green Belt boundaries should only be altered in 'exceptional circumstances' in response to a long-term and strategic requirement. It is, therefore, important that in undertaking a review, all the strategic drivers for that review are covered so that the Green Belt boundary is capable of enduring beyond the plan period. The principal drivers are the sustainable land requirements for housing and employment. The Green Belt boundary review will also need to allow sufficient flexibility in the process, to consider the outcomes of the Joint SHMA particularly in relation to the potential long-term sustainable development needs of Coventry and the duty to cooperate.

The essential characteristics of Green Belt are their 'openness' and 'permanence'. The NPPF stresses that... "Local planning authorities with Green Belts in their area should establish Green Belt boundaries in the Local Plans, which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries

should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” (Paragraph 83). In practice, this means that, once Green Belt boundaries have been defined, they should only be reviewed if the development needs of an area, looking ahead over the long term, clearly cannot be met from within the urban area(s), principally through the recycling of previously developed land. Approximately 81% of Warwick District is currently Green Belt. Because of the period of time since the Green Belt was designated, combined with the forecast extent of housing and employment needs during and beyond plan periods, there is a significant likelihood that the boundaries will need to be revised. In this context, the NPPF makes it clear that revisions to Green Belts should only take place through the Local Plan process.

In undertaking a partial review of the Green Belt boundary within Warwick District, it is important to set out the essential context within which that review needs to take place. The NPPF emphasises that sustainable development principles should be used when reviewing Green Belt boundaries (paragraphs 84-86). Local planning authorities should consider the consequences for sustainable development of channelling development towards the urban areas inside the inner Green Belt boundary, towards towns and villages inset within the Green Belt, or towards locations beyond the outer Green Belt boundary.

They should not include land which it is unnecessary to keep permanently open and where necessary identify areas of ‘safeguarded land’ between the urban area and the Green Belt in order to meet longer-term development needs well beyond the plan period. Villages that make an important contribution to the ‘openness’ of the Green Belt, should be included within the Green Belt. However, if the character of a village needs to be protected for other reasons, then other means should be used, such as Conservation Area or normal development management policies, and the village excluded from the Green Belt. The existing methodology used by WDC states that “countryside is taken to mean open land. For the purpose of this review, only very small settlements (fewer than 50 residents) are considered as part of the open countryside.” This may not be a robust position to take, as each village should be assessed on whether the “open character” of the village, makes an important contribution to the openness of the Green Belt, rather than the number of residents living in the village. It may not be appropriate to have a blanket removal of all villages from the Green Belt, without carrying out an “open character” assessment. In certain circumstances, a proposed Green Belt village extension, or ‘safeguarded land’ approach, might be a more robust position to take.

From the information available, it appears that there may be a compelling case, demonstrated by exceptional circumstances, for Warwick District Council to undertake a strategic review of the Green Belt in its area; to consider whether all parts meet national policy aims and purposes; and whether urban and/or village extensions would provide most appropriately for sustainable growth to meeting long term development land supply needs, in a manner which would be least damaging to

the fundamental aim of Green Belt policy to prevent urban sprawl and the five purposes of Green Belt.

In principle, the Green Belt Evaluation Methodology appears to be a robust approach, looking specifically at the fundamental aim of the Green Belt to prevent urban sprawl; the essential characteristics of openness and permanence; and the five purposes of Green Belt. At this stage, it is important that this approach is not cluttered or confused with other attributes, which are not relevant in defining or reviewing boundaries. For this reason, it is recommended that the specific section on Green Belt Use be removed from the Evaluation Methodology and possibly considered under 'Sustainable Development Constraints and Opportunities' (see attached revised Evaluation Methodology template).

As this is a partial review of the Green Belt boundary, further consideration may need to be given to ensuring that only relevant criteria is used to review the boundary in the respective Green Belt parcels. This will help to establish whether all parts meet the national policy aim and purposes of the Green Belt, and can provide most appropriately for sustainable growth, in a manner which would be least damaging to the Green Belt. The criteria should reflect both national and local circumstances, and one or more of the criteria may determine the outcome of the boundary review. As part of this review, consideration should also be given to current proposals, which may impact on the Green Belt, in particular, the Coventry Gateway, HS2 and the exploration of underground coal gasification sites. The potential cumulative impact of major proposals and associated infrastructure on the Green Belt should also be considered.

However, in order to evaluate whether a particular parcel may help to promote sustainable patterns of development, as an urban or village extension, other non-Green Belt factors will need to be considered, including landscape quality, biodiversity and nature conservation (including *local* biodiversity offsetting), quality of agricultural land, flood zones, etc.

In the light of the earlier Joint Green Belt Study of January 2009, which may have different conclusions to this boundary review, the public will need to be presented with an accurate picture of what reasonable alternatives have been assessed and why they are not considered to be the best option(s)?

If land is removed from the Green Belt, then landscape and local biodiversity enhancement should be placed at the heart of any future development process. In this way, developers can profit, while businesses and communities reap the environmental, social and economic benefits. In particular, planning and implementing substantial landscape and biodiversity frameworks, well in advance of major developments and transport infrastructure proposals, can bring many benefits, including safeguarding and enhancing vital landscape and biodiversity assets, helping to create a sense of place for new development and retaining vital links with the past. This reflects the approach recommended in the emerging sub-regional

Green Infrastructure Strategy 2013, and is a philosophy that is also promoted by the Landscape Institute, the professional body for landscape architects, in its pamphlet titled '*Why Invest in Landscape?*' published in 2011. For example, this approach is being considered as part of the HS2 evaluation process (see Map 1) and the following draft comments were made by the consultants working on HS2 to the statutory Warwickshire, Solihull and Coventry Local Access Forum in September 2013:

Comments relating to landscape and green infrastructure, views from public rights of way, and use of the Warwickshire Landscape(s) Guidelines.

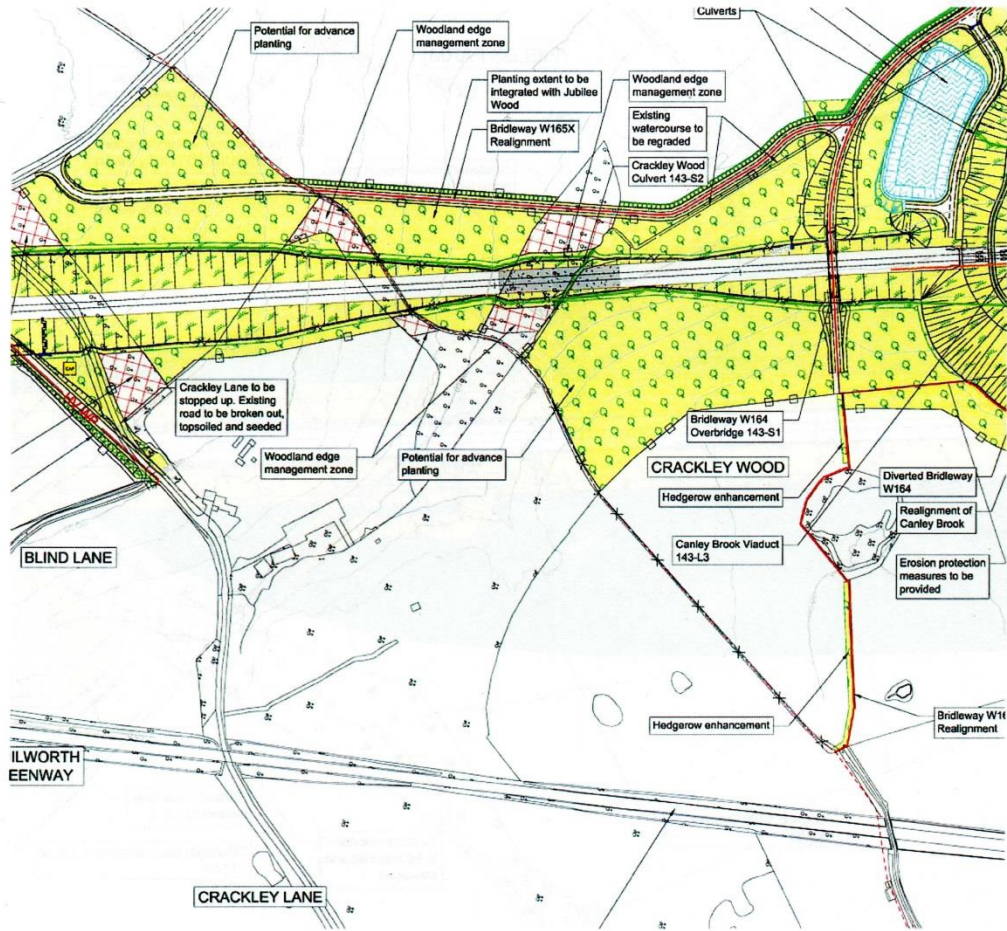
“The landscape and visual assessment methodology applied in the ES considers short medium and long distance views from representative receptor locations including PRoW. The landscape and visual assessment methodology applied in the ES makes use of the Warwickshire Landscape Guidelines and Warwickshire Coventry and Solihull Sub-Regional Green Infrastructure Study. The findings of this landscape and visual assessment as it has developed have been used to advise HS2 consultants in developing the landscape aspects of the emerging design.”

Comments relating to environmental, social and economic benefits.

“The landscape aspect of the scheme design aims to respect landscape character and local distinctiveness. The landscape scheme includes elements which are both in close proximity to the trace and, where appropriate in landscape terms, at a greater distance of up to 2km in order to better assimilate the Scheme into the local landscape and where required to provide replacement habitat. Maintaining and creating linkages between these landscape (and habitat) elements is an important consideration of the emerging design.”

Comments relating to mitigation and enhancement of Landscape Character, improvements including hedgerows and field boundaries, woodlands, grasslands, wetlands, and rural character.

“The landscape aspect of the scheme design aims to respect landscape character and local distinctiveness. The landscape scheme includes elements which are both in close proximity to the trace and, where appropriate in landscape terms, at a greater distance of up to 2km in order to better assimilate the Scheme into the local landscape and where required to provide replacement habitat. The landscape aspect of the scheme design aims to respect landscape character and local distinctiveness. This will involve ‘repair’ to landscapes damaged by the HS2 works.



Map 1 HS2 Preliminary Design Example

Maintaining and creating linkages between these landscape (and habitat) elements is an important consideration in the design. Where hedgerows form part of the landscape scheme, these will incorporate species appropriate to the locality. These would include hedgerow oak trees where these are locally appropriate. HS2 has committed to large scale tree planting. The landscape and ecology assessment teams have identified new woodland planting locations, selected to respect landscape character and local distinctiveness.”

The landscape quality of the urban fringe countryside is a key influence on how the overall character of the Warwickshire landscapes are perceived and enjoyed. Rural urban fringe landscapes close to the main towns and villages are widely recognised as highly important to people’s experiences and quality of life. Opportunities should be sought to reinforce and enhance landscape character, by creating new and maintaining existing Green Infrastructure, linking urban areas with the wider countryside. For example, this could include establishing new Community Forests (as referenced in the NPPF, paragraph. 92) and community wildflower meadows.

New development on the edge of a settlement has the potential to be visually intrusive, particularly in the early years before landscape mitigation schemes mature. In responding to the planned expansion of settlements, particular attention will need to be given to the manner in which new developments can be sensitively accommodated into the rural-urban fringe landscape in terms of their siting, materials and design, including scale, layout and landscape mitigation measures.

Strategic transport routes are a primary means by which many people see and experience Warwick district, including visitors, tourists and investors. Many of these routes are major road and rail corridors, which although they may not prejudice the purposes of including land in Green Belts, might be visually detrimental to the open character of the Green Belt. Opportunities exist to enhance these corridors in order to minimise their adverse impact on the Green Belt and improve the overall visual experience, while strengthening landscape character and a sense of place. Such enhancements may include the ecological management of roadside verges for wild flowers and wildlife habitats, the extension of roadside verge tree and shrub planting, clearing litter, reducing unnecessary clutter and limiting standardised treatments, particularly during highway improvement schemes.

Clearly any review of Green Belt boundaries, is likely to encourage an element of speculative interest from developers and objections from the local community. For example, developers in advance of the Coventry Core Strategy have widely consulted the local community on a proposal to develop approximately 42 hectares of Green Belt land in Keresley to accommodate up to 800 new homes. The public consultation closed on 27th October 2013 and the developers have stated that following the public consultation *“a planning application will then be submitted to Coventry City Council”*:

<http://www.southkeresley.co.uk/>

<http://keresley-pc.gov.uk/>

Sustainable Development Constraints

In reviewing Green Belt boundaries, Warwick District Council will be considering the need to promote sustainable patterns of development by making suitable land available for development in line with economic, social and environmental objectives, while seeking to protect and enhance the natural and historic environment, the quality and character of the countryside and existing communities. The transparency of this process and its ability to involve the public will be critical to its success, with plans based on robust evidence and analysis.

The criteria used to assess the potential for Green Belt release in Warwick District need to relate to the fundamental aim of the Green Belt and its five purposes established in the NPPF. In this way, the extent of the contribution which each parcel

of Green Belt land makes to the aim and purposes can be properly assessed. Sustainability factors will also need to be taken into account when assessing potential urban or village extensions, including landscape and nature conservation, habitat biodiversity, flood zones, and linkages with existing built-up areas.

The Green Belt review will assess whether there are some areas of Green Belt, which could be released from designation, without undermining the fundamental aim and five purposes of Green Belt, as expressed in the NPPF. However, given that the detailed Green Belt boundaries in Warwick District were established many years ago, any release of land from the Green Belt for built development will almost certainly have some impact. The purpose of establishing robust criteria, given that exceptional circumstances require that a review takes place, is to ensure that the least damage is caused to the underlying aim and purposes of the Green Belt, while taking account of the need to promote sustainable patterns of development by such land being released. The identification of defensible, long-term Green Belt boundaries is critical in this process, as expounded in the NPPF and these boundaries should be determined by using permanent, physical features that are easily recognised, and considering short, medium and long distance views.

The identification of Sustainable Development Constraints will help to ensure that any land proposed for release from Green Belt status for potential development can be achieved in a way that:

- does not damage land with important landscape or nature conservation value;
- does not damage land which performs an important floodplain function; and
- is readily accessible to and from existing, or easily extended, facilities or services.

The sustainability criteria for the review may also include the following considerations:

- Areas of land for release from Green Belt designation will only be recommended if it will not damage the open character of the Green Belt in the surrounding area, or give the appearance of urban sprawl by reducing important gaps between urban areas and encroachment into the open countryside.
- Release of designated Green Belt will not significantly harm or detract from views of nearby historic towns.
- The release of Green Belt land will not damage sensitive areas of landscape, archaeological, geological, nature conservation or habitat biodiversity, including Sites of Special Scientific Interest (SSSI), Local Wildlife Sites (LWS), Local Geological Sites (LGS), Local Nature Reserves (LNR), Ancient Woodlands (AW), ancient hedgerows and TPO or veteran trees.

- The release of designated Green Belt land is not in a defined floodplain or flood zone.
- Land proposed for release from the Green Belt is capable of being developed in a sustainable way and readily integrated with the existing built-up area, so that existing and planned key services and facilities (including facilities for public transport, walking, cycling, social, community and leisure) can all be easily accessed and connected.

Other constraints may include:

- Habitat biodiversity
- Landscape character and condition (Warwickshire Landscape Guidelines)
- Topography
- Agricultural Land Classification (1, 2 & 3a)
- Cultural heritage (including architectural heritage such as statutory Conservation Areas, Listed Buildings and Registered (or historic) Parks and Gardens)
- The inter-relationship between sustainability constraints and potential cumulative impact.

Design Constraints and Opportunities

With the ‘standardisation’ across the country of many building designs, materials, layouts, road design, signage and even landscaping, there is an increasing threat to our regional and local diversity. Often such changes may be small and piecemeal, but cumulatively they can have an insidious effect on the distinctive difference between town and country. In the emerging sub-regional Green Infrastructure Strategy, it emphasises that *“as we increasingly appreciate our local distinctiveness and landscape character, we also realise how vulnerable that distinctiveness can be in an age of mass production and standardisation. There is a growing trend towards uniformity and it is becoming increasingly difficult to identify from our surrounding, which part of the countryside we are in. It is, therefore, essential that we understand what contributes to the character, quality and local distinctiveness of the Warwickshire landscapes, so that we can recognise the impact of the decisions that we take, both as individuals and as a society.”*

In this context, it will be particularly important that in providing the buildings and infrastructure that present day society – after measured reflection – decides it needs in the villages of Warwick district, it is achieved in a way that still retains and possibly enhances ‘local distinctiveness’ and the essential visual harmony of the countryside. This will help to ensure that new buildings use the best of what modern materials

and techniques can offer, but in ways that respect and reinforce local tradition and a sense of place. Buildings and development should be ‘part’ of the landscape and nature, and not ‘apart’ from it. For example, old vernacular cottages, hamlets and villages can contribute just as much to landscape character as any natural feature. This is recognised in the Warwickshire Landscapes Guidelines: *“If the existing character is to be maintained, consideration must be given to retaining traditional style and features. New housing should also harmonise with the vernacular style, with particular attention being given to scale, building materials and the incorporation of traditional features.”* Local design guidelines may also be helpful (such as those prepared by Coventry City Council – *Design Guidelines for Development in Coventry’s Ancient Arden*) and/or Village Design Statements.



Arden Farmhouse

Revised Evaluation Methodology

A revised Evaluation Methodology template is attached to this report, which seeks to focus more specifically on the fundamental aim, essential characteristics and purposes of the Green Belt as part of a boundary review, rather than including positive uses and enhancements, which are not fundamental to its designation, review or continued protection. Such considerations, however, may form an important part of the additional sustainable development constraints. There also needs to be a clear distinction made in the evaluation process between an assessment of the parcels and the individual sub-sites reviewed within those parcels. In particular, on how the preferred options were chosen, and what reasonable alternatives were considered and why they were not chosen.

2. Pro Forma Analysis of Preferred Option Parcels

The purpose of this section is to provide an analysis of selective Green Belt land parcels, with reference to the Green Belt Evaluation Methodology, in order to assess robustness in making recommendations about whether parcels of land should be considered for release from the Green Belt to accommodate sustainable patterns of development. It does not consider non-Green Belt constraints, or the infrastructure capabilities of the parcels, which may significantly affect the suitability of a site for sustainable development. For example, floodplain, nature conservation or landscape considerations that can be made at a more detailed stage of an assessment. The same evaluation methodology has been used to review land surrounding non-Green Belt villages, as villages which are currently washed over with Green Belt.

The NPPF enables specific local Green Belt boundary adjustments to be made, in exceptional circumstances, including urban and village extensions, to meet long term needs and promote sustainable patterns of development through the Local Plan strategy. Boundaries should be defined clearly, **using physical features that are readily recognisable and likely to be permanent**, such as roads, railways, watercourses (canals, rivers and streams) mature natural field boundaries, woodland edges and topographical features such as ridgelines. In reviewing the Green Belt boundary, there will also be a duty to co-operate with adjoining authorities to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans.

In the methodology review, this report emphasises the need for a clear distinction to be made between an assessment of the parcels and the individual sites within those parcels. In particular, on how the Preferred Option Sites were chosen, and what reasonable alternative sites were considered and why *they* were not chosen. Also, a Green Belt 'parcel' may score 'high' in the Overall Value Assessment (OVA), but if the same methodology is then applied to an individual site (sub-parcel), that sub-parcel may only achieve a 'medium' or 'low' score, in terms of the contribution it makes to the fundamental aim, essential characteristics and purposes of the Green Belt, even though the OVA for the whole parcel remains high. This evidence-based process needs to be proportionate and transparent to ensure robustness. It is, therefore, recommended that a sub-parcel OVA also be included within the Green Belt Assessment, coupled with simplified, logical, clearly-labelled and consistent map cross-referencing to help ensure that it does not become necessary *"to embark on a paper-chase in order to understand the environmental effects of a proposal."* (Forest Heath SEA Test).

During the course of Warwick District Council's Green Belt Assessment, approximately XX% of the area's Green Belt has been systematically discarded as not being suitable for development, in order to maintain the fundamental integrity of the Green Belt. This has left a number of sites that may potentially be suitable for

accommodating sustainable patterns of development and growth, while still seeking to maintain and possibly improve the overall integrity of the Green Belt.

The Core Strategy will determine Warwick District's Council's Preferred Option. This will set out exactly how much land is needed and where the sites for development will be and the Green Belt Assessment will help the Council to make informed decisions about Warwick District Council's Green Belt.

This review recommends that a Green Belt Assessment should be carried out in four stages:

- Stage 1 sub-division of Warwick district's Green Belt into logical and clearly identified parcels for the purposes of the Assessment;
- Stage 2 assessment of every parcel against the fundamental aim, essential characteristics and five purposes of including land in the Green Belt (Parcel OVA);
- Stage 3 assessment of individual sites (sub-parcels), against the fundamental aim, essential characteristics and five purposes of including land in the Green Belt (Sub-parcel OVA); and
- Stage 4 assessment of the remaining sub-parcels against a range of sustainable development constraints and opportunities, including accessibility criteria, resulting in a list of Preferred Options.

The aim at each stage would be to rule out those parcels and sub-parcels of land in the Green Belt that need to be kept open in order to maintain the fundamental integrity of the Green Belt. There should not be a 'call for sites' exercise, as this could imply that the Assessment is 'developer-led', rather than being an appropriate assessment considered against strict Green Belt criteria and based on proportionate evidence. It could also encourage the clearance of important natural assets on land, such as mature trees, hedges and natural vegetation. As a result, the Assessment should not seek to make assumptions about any landowner intentions. Potentially, this could mean that some of the areas that are identified as having sustainable development potential, will not be taken forward to the Core Strategy 'Preferred Options' stage and Site Allocations DPD as they will not ultimately be available for development, even if they are located in potentially sustainable areas.

The selective parcels/sub-parcels (Preferred Options) considered in this report are:

Baginton Barford Bishops Tachbrook Burton Green Coventry (Baginton and Stoneleigh) Cubbington Hampton Magna Hatton Park	Hatton Station Hill Wootton Hockley Heath Kingswood Leek Wootton Radford Semele Shrewley Common
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Baginton BAG 4

Green Belt OVA (High) reflects the importance of Parcel BAG 4 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: North of Rosswood Farm (OVA Medium)

The Sub-parcel is a sensitive edge of village location and could accommodate a village extension as part of a sustainable pattern of development within the proposed village inset, with a modest impact on the fundamental aim and purposes of the Green Belt. However, there are non-Green Belt constraints that will need to be considered.

Barford BAR 1

Green Belt OVA (Low – Medium) is a reflection that the fundamental aim, essential characteristics and purposes of the Green Belt have been compromised in this parcel.

Sub-parcel: Sherbourne Nursery (OVA Low to Medium)

The plant nursery site is largely contained by the A429 and properties along Wellesbourne Road and Westham Lane. The site could accommodate a village extension, within the proposed village boundary, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Barford BAR 2

Green Belt OVA (Low to Medium) is a reflection that the fundamental aim, essential characteristics and purposes of the Green Belt have been compromised in this parcel, coupled with the gradual loss of an agricultural function.

Sub-parcel: Land off Bremridge Close (OVA Low)

Site contained by Bremridge Close and mature hedgerows, and could accommodate a village extension within the proposed village boundary, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land west of Wellesbourne Road (OVA Low)

A small triangular and largely brownfield site, with a low overall Green Belt value.

Bishop's Tachbrook BT 4

Green Belt OVA (Medium) reflects the importance, with some limitations, of Parcel BT 4 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: South of School (OVA Medium)

Site could accommodate a carefully designed village extension within the proposed village boundary, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, there would need to be significant enhancement to establish a sensitive transition between the edge of village and the adjoining countryside.

Burton Green BG 3

Green Belt OVA (High) reflects the importance of Parcel BG 3 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Burrow Hill Nursery (OVA Low to Medium)

The Sub-parcel is an existing nursery site on the edge of the village and contained by Hob Lane and Red Lane. The site has substantial areas of hardstanding and some built development. The review of the Green Belt boundary could be accommodated within the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Coventry (Baginton/Stoneleigh) BAG 6

Green Belt OVA (Low) - small triangular parcel which plays a minor Green Belt role and has a stronger function as part of the surrounding built-up landscape.

Sub-parcel: Land at Oak Lea, Howes Lane (OVA Low)

A relatively small site tightly contained by residential development off Howes Lane and by the A46. The site has limited value in meeting the fundamental aim, essential characteristics and purposes of the Green Belt. However, the site and its natural assets may need to be protected for other greenspace reasons, through normal development management policies.

Cubbington CU 1

Green Belt OVA (Medium to High) reflects the importance of Parcel CU 1 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Allotment Land, Rugby Road, Cubbington (OVA Medium)

The Sub-parcel partly contained by the Rugby Road and Coventry Road, could accommodate a limited village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration will need to be given to ensuring that the boundaries fronting the open countryside are defined clearly, using existing physical features that are readily recognisable and likely to be permanent.

Sub-parcel: Land opposite Willow Street Meadow (OVA Medium)

The Sub-parcel partly contained by the Coventry Road, could accommodate a limited village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration will need to be given to ensuring that the boundaries fronting the open countryside are defined clearly, using existing physical features that are readily recognisable and likely to be permanent.

Hampton Magna HM 1

Green Belt OVA (High) reflects the importance of Parcel HM 1 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land South of Arras Boulevard (OVA Medium)

The Sub-parcel could accommodate a sensitively designed village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration will need to be given to ensuring that the boundary fronting the open countryside is consistent with the proposed village inset boundary, and is clearly defined using permanent physical features that are readily recognisable.

Hatton Park HP 4

Green Belt OVA (Medium to High) reflects the importance of Parcel HP 4 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land North of Birmingham Road (OVA Medium)

The Sub-parcel is largely contained within the Birmingham Road (A4177) and Ugly Bridge Road and could accommodate a sensitively designed village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Hatton Station HS 7

Green Belt OVA (High) reflects the importance of Parcel HS 7 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Former Storage Depot, Oakdene Crescent (OVA Low)

The sub-parcel adjoins Hatton Park Station alongside the railway line and is in a potentially sustainable location. The site could accommodate a sensitively designed village extension, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, there may be habitat biodiversity constraints that would need to be considered, and any village inset boundary would need to be consistent with the Green Belt boundary.

Hatton Station HS 1

Green Belt OVA (Medium) reflects the importance, with some limitations, of Parcel HS 1 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land off Station Road (OVA Low)

The triangular sub-parcel of land adjoining the M40 and could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, the Green Belt boundary would need to be consistent with the village inset and there may be other sustainable development constraints.

Hill Wootton HW 1

Green Belt OVA (High) - Important Green Belt parcel which fulfils a very valuable role in maintaining the open space between larger settlements and preserving the setting of Hill Wootton and Blackdown villages.

Sub-parcel: Land south of Hill Wootton Road (OVA High)

The 'open character' of Hill Wootton currently makes an important contribution the openness of the Green Belt. The Sub-parcel could not easily accommodate a limited infill, without compromising this essential open character, and the fundamental aim and purposes of the Green Belt.

Hockley Heath HOCK 1

Green Belt OVA (High) - Strategically important Green Belt parcel which fulfils a very valuable role in maintaining the open space between Hockley Heath and Dorridge.

Sub-parcel: Former Aylesbury House Hotel and Surrounds (OVA Medium)

The former hotel site includes some substantial built development and hardstanding, within extensive open and wooded grounds. The Sub-parcel could accommodate a limited village extension, while accepting some compromise on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration would need to be given to any proposals for development, that would

be conspicuous from the Green Belt and which might be visually detrimental by reason of siting, materials and design. Clearly, important natural assets, including mature wooded areas, trees and hedgerows would also need to be safeguarded.

Kingswood KW 1

Green Belt OVA (Medium) reflects the importance, with some limitations, of Parcel KW 01 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land South of The Stables, Station Lane (OVA Low to Medium)

Green Belt parcel that could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, important natural assets should be protected and enhanced.

Sub-parcel: Land to the rear of Kingswood Cottages (OVA Medium)

A sensitive Green Belt parcel that is partially bounded by the Grand Union Canal, and helps to contain and naturally screen the adjoining built development of the village from the open countryside. The parcel could only accommodate a very limited extension to the village without significantly impacting on the fundamental aim, essential characteristics and purposes of the Green Belt. Important natural assets on the site, particularly the mature trees and hedges, and the rural Green Belt and wildlife corridor of the canal, would need to be protected.

Kingswood KW 4

Green Belt OVA (High) reflects the importance of Parcel KW4 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: East of Lensana, Old Warwick Road (OVA Medium)

The Green Belt parcel is partially bounded by the main railway line and Old Warwick Road. It could potentially accommodate a sensitively designed small scale development, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, important natural assets would need to be protected, particularly the mature trees.

Kingswood KW 9

Green Belt OVA (Low – Medium) is a reflection that the fundamental aim, essential characteristics and purposes of the Green Belt have been compromised in this parcel.

Sub-parcel: Meadow House (OVA Low to Medium)

Small Green Belt parcel that could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, important natural assets should be protected and enhanced.

Sub-parcel: Kingswood Farm, Old Warwick Road (OVA Low to Medium)

The Green Belt parcel could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. The Grand Union Canal would provide a permanent defensible boundary. However, important natural assets should be protected and enhanced, particularly in proximity to the canal; a provisional Local Wildlife Site (LWS).

Kingswood KW 10

Green Belt OVA (Low – Medium) is a reflection that the fundamental aim, essential characteristics and purposes of the Green Belt have been compromised in this parcel.

Sub-parcel: Land to the west of Mill Lane (OVA Low to Medium)

A small sub-parcel bounded by Mill Lane, Old Warwick Road and the Stratford-upon-Avon Canal that could accommodate a sensitively designed canal-side development, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Kingswood KW 14

Green Belt OVA (Low – Medium) is a reflection that the fundamental aim, essential characteristics and purposes of the Green Belt have been compromised in this parcel.

Sub-parcel: Rear of Broom Hall Lane (OVA Low to Medium)

The Green Belt parcel could accommodate a limited village infill development, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. Important natural assets would need to be safeguarded, particularly the mature trees and hedgerows and sensitively designed boundary treatment would also be important, particularly along the access track fronting the open countryside.

Leek Wootton LW 4

Green Belt OVA (High) reflects the importance of Parcel LW4 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: The Paddock, Warwickshire Police HQ (OVA Medium)

The Green Belt parcel could accommodate a limited village extension as part of the proposed village inset, to help promote a sustainable pattern of development. However, this would need to be balanced against the potential impact that the development would clearly have on the fundamental aim, essential characteristics and purposes of the Green Belt. Important natural assets would also need to be protected and enhanced.

**Sub-parcel: Land North of Main Entrance, Warwickshire Police HQ
(OVA Medium)**

The Green Belt parcel could accommodate a limited village extension as part of the proposed village inset, to help promote a sustainable pattern of development. However, this would need to be balanced against the potential impact that the development would clearly have on the fundamental aim, essential characteristics and purposes of the Green Belt. Important natural assets would also need to be protected and enhanced.

**Sub-parcel: Former Tennis Courts, Warwickshire Police HQ
(OVA Low to Medium)**

Green Belt parcel that could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

**Sub-parcel: Care Home Site, Warwickshire Police HQ
(OVA Medium to High)**

Predominantly a brownfield site occupied by substantial buildings and hardstanding that are well screened by wooded areas, mature trees and natural vegetation. Any development that extends beyond the brownfield footprint of the site, may prejudice the fundamental aim, essential characteristics and purposes of the Green Belt.

**Sub-parcel: Informal Car Park, Warwickshire Golf & Country Club
(OVA Low to Medium)**

Green Belt parcel that could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Radford Semele RS 1

Green Belt OVA (Medium to High) reflects the importance of Parcel RS 1 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land to the east of Church Lane (OVA Medium)

The greenfield parcel could accommodate a limited village extension as part of the proposed village inset with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt. However, particular consideration would need to be given to protecting and enhancing the strategic gap between the village and the urban area of Leamington Spa. The natural assets, particularly in proximity to the Grand Union Canal, provisional Local Wildlife Site (LWS), will also need to be safeguarded.

Shrewley Common SC 1

Green Belt OVA (Medium to High) reflects the importance of Parcel SC 1 in meeting the fundamental aim, essential characteristics and purposes of the Green Belt.

Sub-parcel: Land at The Gatehouse (OVA Low to Medium)

Green Belt parcel that could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.

Shrewley Common HS 3

Green Belt OVA (High) - An important Green Belt parcel which fulfils a valuable role in maintaining the setting and open landscape of Shrewley Common, Rowington and Turners Green.

Sub-parcel: Land SE of Shrewley Common (OVA Low to Medium)

Green Belt parcel that could accommodate a limited village extension as part of the proposed village inset, with a modest impact on the fundamental aim, essential characteristics and purposes of the Green Belt.



Ancient Arden bluebell wood

3. Some lessons from Core Strategy Examinations

Earlier Stages of Core Strategy Preparation

- Pay particular attention to planning ahead to obtain and analyse relevant evidence.
- Relevant questions should be asked early on in the process to help prepare for Examination issues.
- Evidence-gathering needs to be well resourced.
- Allow sufficient time for checking and cross-checking and for thinking through the implications of any last-minute decisions.

Council Members

- Members need to fully own the process and decisions.
- There should be informal, cross-party member groups advising on the approach. This will help members to understand the process, as well as the need to make compromises, and the Officers become exposed to members' thinking.

Public Consultation

- There should be an emphasis on front-loading consultation.
- Members of the public affected by major proposals should be written to directly.
- The public needs to understand the process and procedures of the new system.
- The Council need to make it clear how it arrived at its decisions.
- Needs to be equity in terms of inviting all stakeholders to participate.
- Priority needs to be given to getting people involved before the 'line on a map' stage.
- Present the public with an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option.
- The transparency of the plan making system and its ability to involve the public in the policy making process, is critical to its success.
- Consider the use of a weekly newsletter to Members to keep them updated of issues and progress.

Hearings

- Ensure Council is well-represented.
- Share out presentations of the Council's case.
- Have specific administration support to take notes.
- Have a lap-top and printer in the Council's Inquiry preparation room and collective access to a library of documents.
- Make clear any changes to the Inquiry programme and that members of the Team know if they are supporting at the Table.
- A weekly Inquiry timetable may create problems in having to prepare, if officers still have to deal with response papers.

Layout of the Core Strategy

In view of the Green Belt implications for Warwick District, the Green Belt chapter should be given a prominent position early in the document, with the grouping of chapters helping to provide continuity. For example:

- Green Belt
- Green Infrastructure
- Built Environment
- Historic Environment.
- Climate Change
- Flooding & Water
- Housing
- Economy
- Retailing & Town Centres
- Culture & Tourism



Green Belt in winter 2013

GREEN BELT EVALUATION METHODOLOGY FOR PARCELS AND SUB-PARCELS OF LAND (MM)

Fundamental Aim of Green Belt	Essential Characteristics of Green Belt	Boundary Review Criteria	Boundary Review Analysis	Sustainable Development Constraints and Opportunities
<p>To prevent urban sprawl by keeping land permanently open.</p>	<p>Openness is an essential characteristic of Green Belt</p>	<p>There is an absence of existing built development, or current planning permissions for inappropriate development.</p> <p>The landscape is predominantly open and rural in character.</p> <p>The openness, character and condition of the Green Belt remain largely intact, with particular reference to the Warwickshire Landscapes Guidelines. Built development would have the potential to significantly affect the open character and visual amenities, whether or not it is visible from public footpaths, bridleways or viewpoints.</p>	<p>(Q1) Is it necessary to keep the parcel of land permanently open to protect the essential characteristic of Green Belt?</p> <p>(Q2) Would development in this parcel be harmful to the open character of the Green Belt, so as to give the appearance of urban sprawl?</p> <p>(Q3) If the character of the area needs to be protected for reasons other than Green Belt, could other means be used, including normal development management policies and the parcel removed from the Green Belt?</p>	<p>This may include:</p> <ul style="list-style-type: none"> Flood zones Nature conservation (including SSSI, LNR LWS, AW, ancient hedgerows, TPO and/or veteran trees) Habitat biodiversity Landscape character and condition (WLG) Topography Geology (including LGS) Agricultural land classification (1, 2 & 3a) Accessibility and connectivity Cultural heritage (including architectural and archaeological) The inter-relationship between sustainability constraints Potential cumulative impact Positive uses, enhancement and opportunities
	<p>Permanence is an essential characteristic of Green Belt</p>	<p>There are exceptional circumstances to justify changes to the Green Belt boundary.</p> <p>Green Belt is associated with readily recognisable physical features which are likely to be permanent e.g. roads, railways, watercourses (canals, rivers and streams), mature natural field boundaries, woodland edges, and topographical features such as ridgelines.</p> <p>The boundary is robust and capable of enduring well beyond the end of the plan period.</p> <p>Land which it is unnecessary to keep permanently open has not been included in the Green Belt.</p> <p>The boundary meets national policy aims and purposes, while urban and village extensions provide most appropriately for sustainable patterns of development and growth.</p>	<p>(Q4) Is this parcel of Green Belt associated with recognisable and permanent physical features?</p> <p>(Q5) Is it possible that the Green Belt boundary may need to be altered at the end of the development plan period?</p> <p>(Q6) Are there any existing or potential threats that may weaken the ability of the Green Belt to endure beyond the plan period, including the potential cumulative impact of major proposals and associated infrastructure?</p>	

Green Belt Purpose	Consideration of Green Belt Purpose	Boundary Review Criteria	Boundary Review Analysis	Sustainable Development Constraints and Opportunities
<p>To check the unrestricted sprawl of large built-up areas.</p>	<p>Protects urban fringe and open countryside from unplanned built development connected to large built up areas, thus maintaining a clear distinction between urban and rural.</p>	<p>The 'green lung' around the towns and villages will be protected and enhanced.</p> <p>A detailed Green Belt boundary will not be altered merely because the land has become derelict. Consideration will be given to alternative positive Green Belt uses.</p>	<p>(Q7) Would the loss of this Green Belt parcel lead to or constitute ribbon development?</p> <p>(Q8) Would the loss of this Green Belt parcel result in an isolated development site not connected to existing boundaries?</p> <p>(Q9) Would the loss of this Green Belt parcel effectively 'round off' the settlement pattern?</p> <p>(Q10) Is this Green Belt parcel connected by several boundaries to the built-up area?</p> <p>Large built-up areas are defined as: Warwick, Royal Leamington Spa, Kenilworth, Solihull Rural South and East (integrating Knowle, Dorridge, Bentley Heath, Balsall Common, Dickens Heath, Cheswick Green, Meriden, Hampton-in-Arden, Hockley Heath, Tidbury Green, Catherine-de-Barnes), Coventry Urban Area and Stratford Upon Avon. Solihull Settlement Study defines Rural South and East settlements as stand alone. However, there appears to be a degree of continuation between settlements (Knowle, Dorridge and Bentley Heath).</p>	<p>This may include:</p> <ul style="list-style-type: none"> • Flood zones • Nature conservation (including SSSI, LNR LWS, AW, ancient hedgerows, TPO and/or veteran trees) • Habitat biodiversity • Landscape character and condition (WLG) • Topography • Geology (including LGS) • Agricultural land classification (1, 2 & 3a) • Accessibility and connectivity • Cultural heritage (including architectural and archaeological) • The inter-relationship between sustainability constraints • Potential cumulative impact • Positive uses, enhancement and opportunities
	<p>Prevents sprawl where development would not otherwise be restricted by a permanent physical barrier (e.g. roads, railways, watercourses, woodland edge or topographical feature).</p>	<p>Development would be contained by strong physical and visual features, and would not lead to subsequent encroachment.</p>	<p>(Q11) Do recognisable and permanent physical features provide a good barrier between the existing urban area and undeveloped land, which if breached may set a precedent for unrestricted sprawl?</p>	
	<p>Prevents development that would result in another settlement being absorbed into a large built up area.</p>	<p>Development is capable of being contained by an existing settlement and strong physical boundaries, and would not lead to 'unrestricted sprawl' into adjoining parcels.</p>	<p>(Q12) Would the loss of this Green Belt parcel result in a small settlement being absorbed into a large built-up area?</p>	
	<p>Protects open land contiguous to, or within close proximity to, a large built up area.</p>	<p>The release of Green Belt land would not damage the open character of the Green Belt.</p>	<p>(Q13) Would the loss of this Green Belt parcel reduce the open land contiguous to, or with close proximity to, the large built up area?</p>	

Prevent neighbouring towns merging into one another.	Prevents the merger of towns within the Green Belt.	The release of Green Belt land will not damage the substantial open character of the Green Belt separating towns and villages. Any gaps that have to be kept open in order to ensure that adjacent settlements do not merge, are identified as essential gaps, regardless of their size or quality.	(Q14) Would the loss of this Green Belt parcel increase the potential merging of towns? (Towns are defined as: Warwick, Royal Leamington Spa, Kenilworth, Solihull Major Urban Area and Stratford Upon Avon.)
	Prevents development that would result in a reduction in the distance between towns.	The perception of settlements merging will vary depending on factors such as the size of the settlements that are to be kept separate, and whether there are visual factors (e.g. motorway or railway embankments, woodlands, groups of trees or buildings) that might break up a gap or help to define it.	(Q15) Would the loss of this Green Belt parcel lead to a significant reduction in the distance between towns?
	Prevents continuous ribbon development along transport routes that link towns.	Land proposed for release from the Green Belt is capable of being developed in a sustainable way and readily integrated with the existing built-up area.	(Q16) Would the loss of this Green Belt parcel lead to or constitute ribbon development between towns (?)
Safeguarding the countryside from encroachment.	Prevents encroachment through having a strong defensible boundary (and/or topography) between the existing urban area and open countryside.	The parcel has a strong defensible boundary that helps to preserve the openness of the Green Belt and facilitate appropriate uses.	(Q17) Would the loss of this Green Belt parcel reduce the defensible boundary between the existing urban area and open countryside?
	Prevents encroachment through the appropriate use of the Green Belt countryside, including agriculture and forestry, outdoor sport and recreation, cemeteries and other uses which preserve openness.	The parcel has predominant land uses that are appropriate in the Green Belt; help to preserve its openness; and do not conflict with the purposes of including land in Green Belt. However, the use of land is not as important as the purposes of including land in the Green Belt.	(Q18) Would the loss of this Green Belt parcel lead to encroachment due to a loss of an appropriate use? (The NPPF defines appropriate uses.)
	Prevents encroachment due to its open character, which is not compromised by existing development that would normally be considered inappropriate in the Green Belt, or where there is damaged or derelict land.	The parcel has a strong defensible boundary that helps to preserve the openness of the Green Belt and facilitate appropriate uses.	(Q19) Does the parcel contain development that is not appropriate in the Green Belt and would normally be classed as previously developed land (brownfield site)?

<p>To preserve the special character of historic towns.</p>	<p>Green Belt makes a positive contribution to the setting of an historic town, including strategic views of the town from the open countryside.</p>	<p>Release of designated Green Belt will not significantly harm or detract from views of nearby historic towns, or the surrounding in which an historic town is experienced.</p>	<p>(Q20) Would the loss of this Green Belt parcel adversely affect the special character and setting of an historic town?</p> <p>(Q21) Would the loss of this Green Belt parcel reduce the significance of an historic town?</p> <p>‘Historic towns’ are defined as: Warwick, Royal Leamington Spa, Kenilworth and Stratford Upon Avon for the purposes of this study.</p>	
<p>To assist in urban regeneration by encouraging the recycling of derelict and other urban land.</p>	<p>Green Belt in Warwick District is considered to play an important role in encouraging the recycling of derelict and other urban land, by restricting the availability of greenfield sites.</p>	<p>Development is channelled towards urban areas inside the Green Belt boundary, and towards towns and villages inset within the Green Belt, in order to promote a sustainable pattern of development.</p> <p>The extent of Green Belt land is tailored to reflect local circumstances.</p> <p>Consideration is given to whether previously development land in the Green Belt could be put to a more productive use, while protecting openness.</p> <p>Strategic priorities across local boundaries are properly co-ordinated and clearly reflected in the Local Plan.</p> <p>Where appropriate, consider the use of ‘safeguarded land’ between the urban area and the Green Belt.</p>	<p>(Q22) Would the loss of this Green Belt parcel, discourage the reuse of brownfield and other land in the urban area?</p> <p>(Q23) Would the loss of this Green Belt parcel help to undermine the viability of the area to attract appropriate inward investment, including tourism?</p> <p>(Q24) Is there a need for ‘Safeguarded Land’ on the edge of an urban area, village or hamlet, in order to meet longer-term development needs well beyond the plan period?</p>	
<p>To preserve the contribution that the open character of a village or hamlet makes to the openness of the Green Belt. (local criteria).</p>	<p>The open character, identity and setting of the individual villages or hamlets, help to preserve the openness of the Green Belt.</p> <p>Green Belt prevents development that would result in a significant reduction in the distance between villages and hamlets.</p>	<p>The ‘open’ character of the village or hamlet makes an important contribution to the ‘openness’ of the Green Belt and should be included in the Green Belt.</p> <p>The general character of the village could be protected by normal development management policies and should be excluded from the Green Belt.</p> <p>The Green Belt land makes an important contribution to preserving the extent and quality of ‘openness’ between villages and hamlets.</p>	<p>(Q25) Does the open character of the village or hamlet make an important contribution to the ‘openness’ of the Green Belt?</p> <p>(Q26) If the character of the village or hamlet needs to be protected for reasons other than Green Belt, could other means be used, such as Conservation Area designation or normal development management policies and the village removed from the Green Belt?</p> <p>(Q27) Would the loss of this Green Belt parcel, significantly reduce the distance and quality of Green Belt land separating villages and hamlets in the locality?</p>	

