
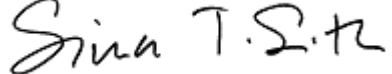


Coventry Joint Green Belt Review *Document Control Sheet*



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1.0 Introduction

1.1 Purpose of the Study

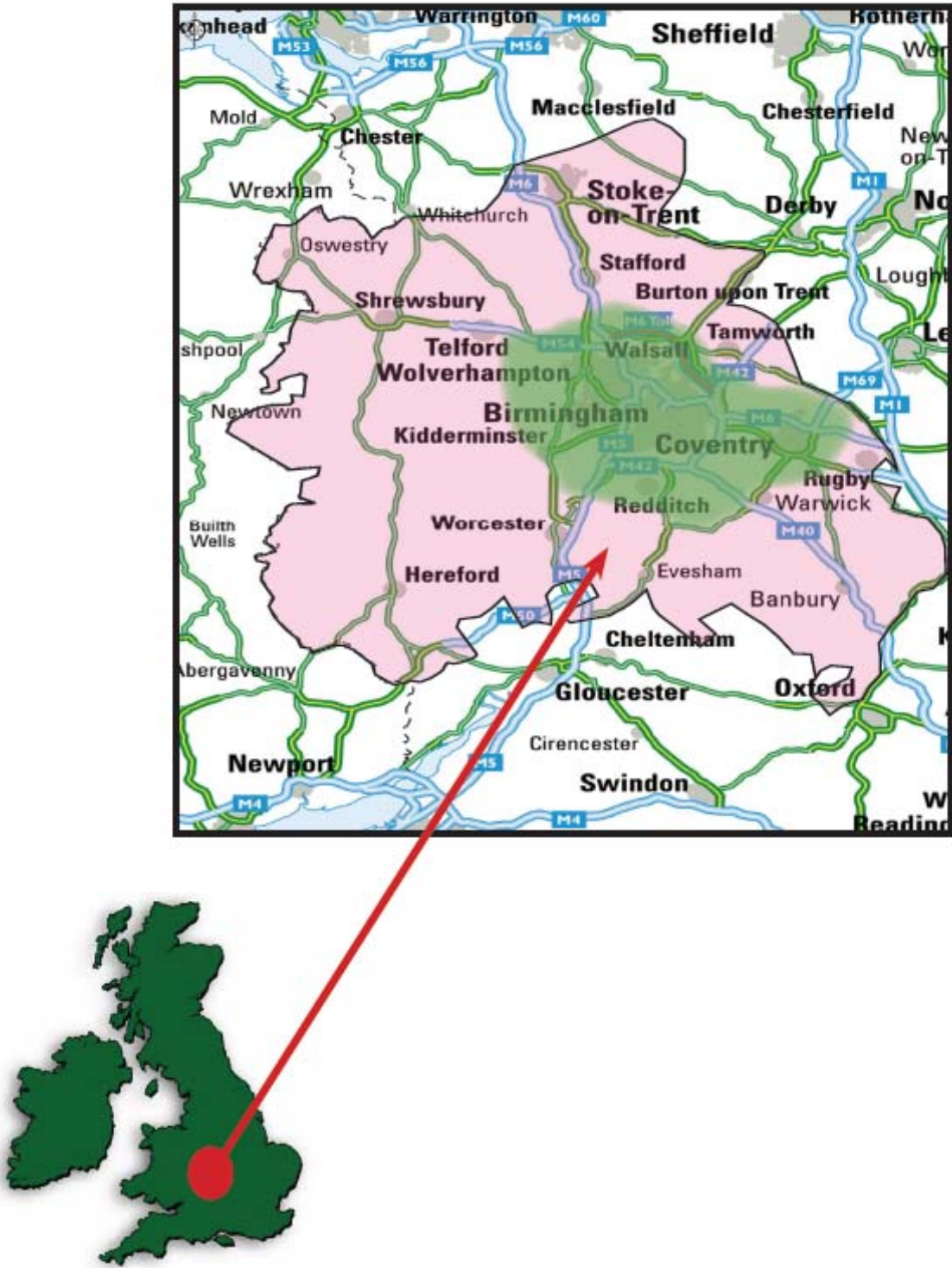
- 1.1.1 The purpose of this study is to review the Green Belt land that surrounds the main urban areas of Coventry City, Nuneaton and Bedworth Boroughs, land adjacent to Coventry within Rugby Borough and Warwick towns of Kenilworth, Warwick and Leamington Spa. This study has been commissioned recognising the RSS Preferred Strategies requirements for joint studies and will form part of the evidence base to inform the respective authorities Core Strategies. The study consists of a two stage process. The first stage identifies those parcels of land within the designated Green Belt around the urban areas that contribute the least towards the purposes of including land within the Green Belt. The second stage then assesses and scores those parcels of land against a range of environmental and physical constraints that might preclude future development.
- 1.1.2 The sites are then scored accordingly. However, it should be noted that it does not necessarily follow that those sites with the fewest constraints would then be identified for development within the respective Core Strategies as a number of other considerations and evidence will need to be taken into account, including the availability and capacity of land, infrastructure and land ownership constraints, as well as sustainability appraisals, etc.

1.2 Background

- 1.2.1 The Planning and Compulsory Purchase Act 2004 introduced a new system of planning. Local Plans are being progressively replaced by Local Development Frameworks which provide planning policies and proposals for their area and which local planning authorities are responsible for preparing and reviewing. Each Local Development Framework comprises a suite of documents individually known as Development Plan Documents.
- 1.2.2 The documents that must be included within the Framework include a Local Development Scheme, a Core Strategy and a Statement of Community Involvement. Other Local Development Documents (LDD's) including Site Allocations, Area Action Plans and Supplementary Planning Documents (SPD's) can make up the remainder of the Framework.
- 1.2.3 The four authorities of Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council have commenced preparation of their Local Development Framework which will supersede their individual existing Plans in accordance with the revised Town and Country Planning Act. The Plans to be superseded include City of Coventry Unitary Development Plan 1996-2011 (December 2001), Nuneaton and Bedworth Borough Local Plan (June 2006), Rugby Borough Local Plan (July 2006) and Warwick District Local Plan 1996-2011 (September 2007).

- 1.2.4 The four Authorities are all in the process of preparing Core Spatial Strategies to determine where and in what form future development should take place within their administrative area, and they are all at varying stages of the process. Having undertaken consultation upon the Core Strategy Issues and Options in May-June 2006, Coventry City Council is now in the process of preparing its Emerging Strategy – its latest pre-submission document.
- 1.2.5 Nuneaton and Bedworth Council propose to consult on the Issues and Options for their Core Strategy during 2009; Rugby Borough Council have completed consultation on their Issues and Options and Preferred Options, and Warwick District Council have published and consulted on Issues and Options.
- 1.2.6 In order to accommodate the level of growth identified for Coventry within the Emerging Regional Spatial Strategy, it has been recognised that some of the housing and employment allocations could be made adjacent to the Coventry urban area but within Nuneaton and Bedworth, Rugby or Warwick districts.
- 1.2.7 The Preferred Options for the Regional Spatial Strategy include a sub-regional section (in Chapter 3) on Coventry-Warwickshire. This sets out a development strategy for the sub-region which aims to focus development in the Major Urban Areas particularly Coventry; as well as within a wider north-south corridor running from Nuneaton to Warwick/Leamington Spa; and finally also within Rugby which is considered to act as a gateway to the Region.
- 1.2.8 Coventry City is surrounded by the West Midlands Green Belt, as detailed within Figure 1 below, and therefore the parcels identified through this study for detailed site identification for possible future growth, will require alterations to the Green Belt. The brief for this study indicates that there is a need to carry out a joint study to assess the areas of the Green Belt within and outside Coventry City which could be safeguarded for future site allocations. This will require a consistent and robust methodology of assessing different areas of the Green Belt.
- 1.2.9 In addition to the need to identify parcels for further detailed analysis adjacent to Coventry, both Nuneaton & Bedworth Borough Council and Warwick District Council are considering options which could result in sustainable urban extensions within their own administrative areas and within their existing Green Belts, to meet the housing and employment targets in the Regional Spatial Strategy Phase 2 Preferred Option.

Figure 1: Location of the West Midlands and the West Midlands Metropolitan Green Belt.



1.3 Scope of the Study

1.3.1 The scope and area of the study to be undertaken by consultants was initially set out in a Project Brief by the four Authorities and refined in discussion with the Council's Officers during the inception meeting on 28th August 2008. The project brief setting out the requirements is contained within Appendix 1, along with Figure 1.1 which identifies the study areas in context to each other.

1.3.2 The Project Brief states that within the WMRSS, the preferred option for the Coventry-Warwickshire sub-region is to focus development in the Major Urban Areas particularly Coventry but also within a wider north-south corridor running from Nuneaton to Warwick and Leamington Spa. The WMRSS also identifies Rugby as a focus for development as it is considered that Rugby acts as a gateway to the Region.

1.3.3 The West Midlands Strategy states that housing land should be phased to encourage regeneration in the Major Urban Areas by giving priority to:

- sustainable locations first and foremost, and within those locations, brownfield land before greenfield land;
- then if necessary – urban extensions within local authority areas;
- only as a last resort, cross boundary urban extensions in the North-South corridor (later in the plan period), if no more suitable alternative capacity is available.

1.2.4 Although not set out within the initial Project Brief, in relation to employment provision, the Draft Regional Strategy states that:

"The Major Urban Areas (MUAs) will be the primary focus for additional investment in sustainable economic growth with an emphasis on creating greater opportunities for development and support for existing economic activities. Sustainable economic growth will also be promoted in the rest of the Region including the Settlements of Significant Development to ensure an appropriate balance between new housing and new employment land provision".

1.2.5 The Regional Strategy further states that any employment development proposed on the edge of the MUAs or on other Greenfield sites should meet the following criteria:

- there are no suitable alternatives available on previously developed land and buildings within built up areas
- the development should be capable of being served by rail or high quality public transport within easy access of centres and facilities and
- the development respects the natural environment, built environment and historic heritage

- 1.2.6 The Regional Strategy also enables specific local Green Belt boundary adjustments for sustainable extensions to be made through LDFs when and where essential to meet long term needs.

1.4 The role of SSR Planning

- 1.4.1 SSR Planning has been appointed by the four Authorities to undertake a review of areas of Green Belt detailed within the Brief. This is to identify parcels of land that contribute the least towards the purposes of including land within the Green Belt and have fewer environmental or physical constraints within and around Coventry, as well as the towns of Nuneaton and Bedworth, Kenilworth, Warwick and Leamington Spa.

- 1.4.2 Working alongside SSR Planning, Richard Morrish Associates and David Brown Landscape Design will provide the landscape analysis of the areas of Green Belt under review.

1.5 Report Content

- 1.5.1 Section 1: Introduction - Sets out the relevant background and scope of the study as well as the role of SSR Planning.
- 1.5.2 Section 2: Planning Background - Provides an overview of the relevant national, regional and local policies in relation to the Green Belt surrounding Coventry, Kenilworth, Nuneaton, Bedworth, Warwick and Leamington Spa and the review to identify land for safeguarding.
- 1.5.3 Section 3: Background Documentation – Provides an overview of the relevant background documents in relation to the Green Belt surrounding Coventry, Nuneaton, Bedworth, Kenilworth, Warwick and Leamington Spa and the review to identify parcels of land for further consideration by the relevant authorities.
- 1.5.4 Section 4: Methodology – Provides details of the methodology used to identify parcels of land for further consideration by the relevant authorities within Coventry, Kenilworth, Nuneaton, Bedworth, Warwick and Leamington Spa.
- 1.5.5 Section 5: Report Findings – Sets out the findings of the study and identifies those parcels of land that score lower following the analysis.
- 1.5.6 Section 6: Recommendations – Sets out a brief recommendation for further investigation of the parcels of land.

2.0 Planning Background

2.1 Overview

2.1.1 The purpose of this section is to set out policy that is relevant to Green Belt land and the assessment of Green Belt land for safeguarding.

2.1.2 Safeguarding is the terminology used within National Guidance. However, at the request of the four commissioning Council's, for the purposes of this study the phrase "safeguarded" will not be used as it was considered that this terminology could mislead members of the public. Alternatively reference will be made to identifying parcels of land within the Green Belt for further consideration by the four Authorities as part of the work on their Core Strategies.

2.1.3 Documents reviewed that are considered to be relevant to the review of Green Belt land for consideration include:

National Policy

- Planning Policy Statement 1: Delivering Sustainable Development (2005);
- Planning Policy Guidance 2: Green Belts (2001);
- Planning Policy Statement 7: Sustainable Development in Rural Areas (2004);
- Planning Policy Statement 9: Biodiversity and Geological Conservation (2005);
- The Town and Country Planning (Green Belt) Direction 2005 (2005);

Regional Policy

- Regional Spatial Strategy for the West Midlands (2008);
- Regional Spatial Strategy for the West Midlands: Phase Two Revision Draft : Preferred Options (2007);

Local Policy

- The City of Coventry Unitary Development Plan 1996-2011 (December 2001);
- Nuneaton and Bedworth Borough Local Plan (June 2006);
- Rugby Borough Local Plan (July 2006);
- Warwick District Local Plan 1996-2011 (September 2007).

2.2 Planning Policy Statement 1 : Delivering Sustainable Development

2.2.1 PPS1: “Delivering Sustainable Development” states that at the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations.

2.2.2 In order to promote a strong, stable, and productive economy that brings jobs and prosperity for all, it is considered that there is a need to recognise that economic development can deliver environmental and social benefits and that the wider sub-regional, regional or national benefits of economic development should be considered alongside any adverse local impacts.

2.2.3 It is also considered within PPS1 that plans for future growth and development should be drawn up over appropriate timescales, and not focus on the short term or ignore longer term impacts and the needs of communities in the future.

2.2.4 Whilst recognising the need for future development, PPS1 identifies the need to also protect the wider countryside, and states that the Government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas.

2.2.5 In this respect, it is considered within PPS1 that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:

- Making suitable land available for development in line with economic, social and environmental objectives to improve people’s quality of life;
- Contributing to sustainable economic development;
- Protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- Ensuring high quality development through good and inclusive design, and the efficient use of resources; and,
- Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

2.2.6 PPS1 seeks to find the common ground between the need for growth and development and the need and desire to protect the wider countryside. PPS1 identifies a general approach to delivering sustainable development, which includes:

- Promoting urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities;
- Bringing forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing;

- Enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character.

2.3 Planning Policy Guidance 2 : Green Belts

2.3.1 PPG2 “Green Belts” provides advice in relation to Green Belts, specifically it:

- states the general intentions of Green Belt policy, including its contribution to sustainable development objectives;
- reaffirms the specific purposes of including land in Green Belts;
- specifies objectives for the use of land in Green Belts;
- confirms that Green Belts must be protected as far as can be seen ahead and advises on safeguarding land for longer-term development needs; and
- maintains the presumption against inappropriate development within Green Belts and refines the categories of appropriate development, including making provision for the future of major existing developed sites.

2.3.2 Whilst PPG2 recognises that Green Belt land can assist in moving towards more sustainable patterns of urban development, it also sets out the five purposes of Green Belts. The five purposes are all of equal importance and are considered to be the most important element of this national policy:

- to check unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

2.3.3 The extent to which these purposes apply to the Green Belt in and around Coventry as well as Nuneaton and Bedworth, Kenilworth, Warwick and Leamington Spa is considered further in Section 4.

2.3.4 As well as the five key purposes, PPG2 also sets out how the use of land within Green Belts has a positive role to play in achieving the following objectives:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses.

2.3.5 In relation to the uses of the land within Green Belts, PPG2 states that:

“the extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt, or in its continued protection. For example, although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection. The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives”.

2.3.6 There is a general presumption against altering the general extent or the detailed extent of the Green Belt boundaries. However the PPG states in paragraph 2.4 that:

“Up-to-date approved boundaries are essential, to provide certainty as to where Green Belt policies do and do not apply and to enable the proper consideration of future development options.”

2.3.7 Once land has been identified and allocated as Green Belt land, the boundary of the land should only be altered in exceptional circumstances and when all opportunities for development within urban areas contained by the Green Belt has been explored.

2.3.8 PPG2 states that when local authorities prepare new or revised plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. Furthermore, to protect land within a Green Belt for the long term, in some cases this will require the identification of land between the urban area and the Green Belt which may be required to meet longer-term development needs.

2.3.9 Annex B of PPG2 sets out the national policy in relation to identifying land for future development within Green Belts:

“...areas and sites which may be required to serve development needs in the longer term, i.e. well beyond the plan period. It should be genuinely capable of development when needed....land should be located where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development.....In identifying land local planning authorities should take account of the advice on housing and on transport. They should also have regard to environmental and landscape quality (so far as is consistent with paragraph 1.7 of PPG2 – as set out within paragraph 2.12 above); to the contribution which future redevelopment might make to remedying urban fringe problems, producing attractive, well-landscaped urban edges; and to the advice on protecting the best agricultural land”.

2.3.10 Once parcels have been identified and further analysis has been undertaken to identify specific sites, it does not constitute an allocation for development. Rather, it is recognition that the land is to be retained for the purpose of meeting possible longer-term development needs.

2.4 Planning Policy Statement 7: Sustainable Development in Rural Areas

2.4.1 PPS7 provides national policy in relation to development within the countries rural areas. It states that the Government's objectives for rural areas are:

- To raise the quality of life and the environment in rural areas;
- To promote more sustainable patterns of development;
- To promote the development of the English regions by improving their economic performance;
- To promote sustainable, diverse and adaptable agriculture sectors.

2.4.2 The Policy Statement identifies key principles that it considers should be applied in relation to the policies set out within the Statement. It is considered that decisions on development proposals should be based on sustainable development principles, ensuring an integrated approach to the consideration of:

- social inclusion, recognising the needs of everyone;
- effective protection and enhancement of the environment;
- prudent use of natural resources; and
- maintaining high and stable levels of economic growth and employment.

2.4.3 Whilst the principal objective of PPS7 is the protection and enhancement of the rural area, it also recognises that in some instances, the most sustainable option is to allow some growth into the rural areas.

2.4.4 PPS7 recognises that in relation to Green Belt land, national policies are set out within PPG2. However, it is considered that planning policies in Local Development Documents should address the particular land use issues and opportunities to be found in the countryside around all urban areas, should recognise its importance to those who live or work there, as well as its role in providing access to the countryside for urban residents.

2.5 Planning Policy Statement 9: Biodiversity and Geological Conservation

2.5.1 PPS9 sets out the Governments vision for conserving and enhancing biological diversity and states that planning, construction, development and regeneration should have minimal impacts on biodiversity and enhance it wherever possible.

2.5.2 In order to achieve the vision, PPS9 sets out the Governments objectives:

- to promote sustainable development by ensuring that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development;
- to conserve, enhance and restore the diversity of England's wildlife and geology;
- to contribute to rural renewal and urban renaissance by enhancing biodiversity in green spaces and among developments and ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment.

2.5.3 PPS9 also sets out key principles that should be adhered to in order to ensure that the potential impacts of planning decisions on biodiversity and geological conservation are fully considered. The key principles include:

- policies on the form and location of development should take a strategic approach to the conservation, enhancement and restoration of biodiversity and geology;
- where granting planning permission would result in significant harm to biodiversity and geological conservation interests, local planning authorities will need to be satisfied that the development cannot reasonably be located on any alternative sites that would result in less or no harm.

2.5.4 Whilst PPS9 does not provide specific guidance in relation to Green Belt land, it does relate to land uses and issues that may be associated with Green Belts. Furthermore, all PPS's and PPG's should be read in conjunction with other relevant national planning documents, as no one document overrides another.

2.6 The Town and Country Planning (Green Belt) Direction

2.6.1 Circular 11/2005 sets out a new free standing Green Belt Direction which came into force in January 2006.

2.6.2 The Circular states that the Government is committed to the principles of the Green Belt and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The Circular further states that the most important attribute of Green Belt is their openness and that the importance of Green Belts in maintaining open countryside around most of our largest and most heavily populated cities and urban conurbations remains undiminished.

2.6.3 The Direction which is contained within the Annex of the Circular requires planning applications for inappropriate development of certain types and scope in the Green Belt, which local authorities are minded to approve, to be referred to the Secretary of State. The Direction applies to all buildings with a floor

space of more than 1,000 square metres, or any other development which by reason of its scale or nature or location would have a significant impact on the openness of the Green Belt.

2.7 West Midlands Regional Spatial Strategy

2.7.1 The West Midlands Regional Spatial Strategy was initially published in June 2004. A subsequent review of the Regional Strategy is being undertaken in three phases. The first Phase related to the Black Country area only and having been completed has been incorporated within the current Regional Plan which was published in January 2008.

2.7.2 It is stated within the West Midlands Regional Spatial Strategy (WMRSS) that:

“the ultimate aim of the Spatial Strategy is a Region made up of a dynamic network of places, all important in their own right and with distinct characteristics, but with reinforcing economic, cultural and social functions. An important part of this is the development of a balanced network of town and city centres that will act as the focus for major investment in retail, leisure and office developments”.

2.7.3 In relation to Coventry it is considered that the above will be achieved through continuing to build upon Coventry's reputation as a forward-looking city which, along with Solihull and Warwickshire, can help create an important growth engine for the region.

2.7.4 The WMRSS sets out a number of Spatial Strategy Objectives to provide the context for the policies detailed within the document. These include:

- to make the Major Urban Areas (MUA's) of the West Midlands increasingly attractive places where people want to live, work and invest;
- to secure the regeneration of the rural areas of the Region;
- to retain the Green Belt, but to allow an adjustment of boundaries where this is necessary to support urban regeneration;
- to support the cities and towns of the Region to meet their local and sub-regional development needs;
- to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion;
- to ensure the quality of the environment is conserved and enhanced across all parts of the Region.

2.7.5 The WMRSS seeks to accommodate a substantial amount of the 240,000 dwelling (approx) housing requirement for the West Midlands within the MUA's. However, outside of the MUA's, progressively lower quantities of housing are proposed so as to meet local needs without providing for continued out-migration.

2.7.6 Policy CF2: "Housing Beyond the Major Urban Areas" states that beyond the MUA's, longer-term strategic housing development should be in those locations which are capable of balanced and sustainable growth and which act as sub-regional service centres. These locations include Worcester, Telford and Rugby. It also states that the function of other large settlements and the regions market towns should not generally be to accommodate migration from the MUA's, and new housing within the rural area should be restricted to meeting local housing need.

2.7.7 It is considered within the WMRSS, that to achieve the levels of housing identified for the metropolitan area, which includes Coventry, there will need to be a substantial commitment to large-scale housing renewal and redevelopment, a proactive approach to redevelopment with high replacement ratios for cleared housing stock and a willingness to support a significant increase in overall densities.

2.7.8 Policy CF3: "Levels and Distribution of Housing Development" details the minima housing rates that are to be applied in relation to the MUA's as well as the environmental safeguards that are to be applied in order to ensure the MUA's are attractive places to live in. Part C of Policy CF3 states:

"locations which extend the boundaries of the MUA's will not be acceptable as they would run counter to the approach taken throughout the Spatial Strategy".

2.7.9 In relation to managing housing land provision, Policy CF6 states:

"Development Plans should include policies that allow for the managed release of new housing land, so as to secure the development of previously developed land...."

2.7.10 The Policy further states that:

"...Development Plans should take account of potential housing land provision and the policy framework in adjoining local authority areas so as not to undermine urban renaissance in other districts".

2.8 Regional Spatial Strategy for the West Midlands: Phase Two Revision Draft : Preferred Options

2.8.1 The Phase Two Revision Draft: Preferred Options document sets out the amendments proposed to the existing West Midlands Regional Spatial Strategy (WMRSS) in relation to sustainable communities, climate change, housing provision, employment land, towns and city centres, transport and waste.

2.8.2 The key objectives for the Phase Two Revision include:

- To re-examine regional needs and sub-regional housing needs and requirements and how these can be best met for the period to 2026;
- To re-examine regional and sub-regional employment land needs and requirements; and
- To re-assess existing strategic land designations and identification of broad locations for additional provision.

2.8.3 Chapter three of the Phase Two Revision states that in relation to the West Midlands, the scale of projected housing need is now such that large parts of the West Midlands MUA's do not have the land capacity to accommodate the necessary building without making inroads into greenfield/Green Belt land. It is further stated that some settlements and local authorities within the surrounding shires are anticipated to provide housing beyond their own generated needs in order to meet this shortfall.

2.8.4 The Regional Objectives are set out within the current Regional Spatial Strategy for the West Midlands as detailed within paragraph 2.34 above. One of the objectives is:

"To retain the Green Belt, but to allow an adjustment of boundaries where this is necessary to support urban regeneration".

2.8.5 The Phase Two Revision expands this objective to state:

"To retain the Green Belt, but to allow an adjustment of boundaries, where exceptional circumstances can be demonstrated, either to support urban regeneration or to allow for the most sustainable form of development to deliver the specific housing proposals referred to within the sub-regional implications of the strategy".

2.8.6 The Phase Two Revision continues identifying that in the MUA's development opportunities will be created to retain and attract people and investment. It is considered that this will be primarily achieved through a number of aims, including:

"Generally resisting peripheral expansion but, in certain circumstances, allowing sustainable urban housing extensions and/or regionally important employment where this supports the urban renaissance of the MUA's where recognised in the sub-regional implications".

2.8.7 Sub-regional implications are set out within the Phase Two Revision, included within which is the sub-region of Coventry and Warwickshire. Within this sub-region it is identified that in order for Coventry to achieve the Governments expectations it will need to consider selective sustainable urban extensions into its surrounding Green Belt. It is also identified that with Coventry at the centre, the sub-region has strong structural and functional relationships

running in a north-south corridor from Nuneaton and Bedworth, through Coventry to Warwick and Leamington Spa.

- 2.8.8 The Coventry-Warwickshire sub-region is in close proximity to the Milton Keynes/South Midlands Growth Area, London and the wider south-east region, all of which are areas of significant economic potential. It is therefore considered that there is the opportunity to focus development and realise the growth potential of the sub-region within Coventry and the wider north-south corridor.
- 2.8.9 Rugby, which is to the east of Coventry, is considered to act as a “gateway” with the East Midlands and South-East Regions and has been identified as a Settlement of Significant Development.
- 2.8.10 The Phase Two Revision states that development will be planned and controlled to ensure that it phases housing land releases to encourage regeneration in the MUA’s by giving priority to:
- *sustainable locations first and foremost, and within those locations brownfield land before Greenfield land;*
 - *then, if necessary, urban extensions within local authority areas;*
 - *only as a last resort, cross-boundary urban extensions in the North-South corridor (later in the plan period), if no more suitable alternative capacity is available.*
- 2.8.11 In relation to cross-boundary urban extensions, the Strategy also states that development will be planned and controlled to ensure that it enables specific local Green Belt boundary adjustment for sustainable urban extensions to be made through LDF’s when and where essential to meet long term needs.
- 2.8.12 Within the document, Table 1 “Housing Proposals 2006-2026” identifies the revised level of housing required during the plan period for each local authority. The growth for Coventry is identified as 33,500 net additional dwellings but this is subject to a specific note (b) which states “dependent upon the capacity in Coventry and the outcome of further studies, some of the allocations could be made adjacent to Coventry within Nuneaton and Bedworth and Warwick districts”.
- 2.8.13 The proposed revision to Policy CF3 states
- “In certain circumstances, the most sustainable form of housing development may be adjacent to the settlement but cross local authority boundaries.....co-operation and joint working will be necessary to ensure that sites are released in a way that supports sustainable development”.*

2.8.14 The proposed revision to Policy CF3 continues, identifying that

“in the following locations, local authorities must jointly consider the most appropriate locations for development before producing or revising Local Development Documents (LDD’s)”.....

“.....Coventry, Nuneaton and Bedworth and Warwick in relation to Coventry”

2.8.15 Table 4 “Employment Land Provision” identifies employment land provision for each local authority within the West Midlands. Footnote “d” which accompany the table states:

“There is unlikely to be sufficient land within Coventry to meet employment land requirements over the plan period. Joint discussions will be required between Coventry CC, Rugby BC, Nuneaton and Bedworth DC and Warwick DC to ensure continuity of supply. Due to its size and strategic significance, Coventry’s employment land needs should be taken into full account when proposals for redevelopment of the site of the former Peugeot Assembly Plant are considered”.

2.8.16 Policy PA6A “Employment Land Provision” which accompanies Table 4, also makes reference to joint working:

“There are a small number of circumstances where employment land provision might need to be made in an adjoining authority’s area. Such circumstances are identified in the table and the relevant authorities will be required to hold cross boundary discussions throughout the preparation of Core Strategies to ensure that such requirements are satisfactorily met”.

2.8.17 Policy PA1 “Prosperity for All” states that the MUA’s will be the primary focus for additional investment in sustainable economic growth. However, where growth opportunities are provided outside the MUA’s, emphasis should be given to locating economic development where it can meet at least one of the identified criteria. The criteria include:

“locating economic development where it can help create more sustainable communities by generally providing a better balance between new housing and new employment and limit the need for commuting”.

2.8.18 Policy PA1 also sets out criteria which any development proposed on the edge of the MUA’s or on other greenfield sites should meet. The criteria are:

- There are no suitable alternatives available on previously developed land and buildings within built up areas;
- The development should be capable of being served by rail or high quality public transport within easy access of centres and facilities; and
- The development respects the natural environment, built environment and historic heritage.

2.9 The City of Coventry Unitary Development Plan 1996-2011

2.9.1 The Coventry Development Plan 2001 covers the period 1996 to 2011 and was adopted in December 2001. In 2004, the Government imposed a number of changes to the planning system in order to speed up the overall planning process and to make it more transparent.

2.9.2 In September 2007 the Secretary of State made a Direction stating that local policies that had not been superseded by national or regional policies would remain in force until they are replaced through the Local Development Framework (LDF) process. Due to the short period of time since the adoption of the Coventry Development Plan, the majority of planning policies were retained, including those outlined below.

2.9.3 Chapter 9 of the Plan covers the "Green Environment" and identifies the policy aim of the Green Environment Chapter is:

"to provide people with rich, accessible and diverse Green Spaces, linked to the surrounding countryside where possible, while ensuring effective conservation of wildlife, landscape and natural features, as important elements of a clean, healthy and sustainable green environment".

2.9.4 Policy GE 1: Green Environment Strategy states that in conjunction with other agencies and the local community, the City Council will:

- Protect green space;
- Enhance the provision and quality of green space;
- Make green space accessible to all sections of the community;
- Encourage the appropriate management of green space;
- Give protection to valuable wildlife, habitats and landscape features; and
- Maintain a Green Belt protecting the green wedges and the "Arden" countryside from inappropriate development.

2.9.5 The Plan identifies that Green Space comprises Green Belt land and Urban Green Space although they are considered to be mutually exclusive.

2.9.6 Extensive tracts of Green Space in and around the Coventry, both open countryside and green wedges, have already been designated as Green Belt, and thereby have strong protection against inappropriate development in order to maintain their existing open character.

2.9.7 Green Space corridors, which may also include Greenways, are identified as having particular value for people and for wildlife. Policy GE 3: Green Space Corridors states:

"a network of Green Space corridors will be protected, promoted and encouraged across the City for:

- *amenity;*
- *access to open countryside;*
- *outdoor sport and recreation;*
- *environmental education; and*
- *landscape and nature conservation.*

They include green wedges, wetlands and river corridors, linear open spaces and the Coventry Canal”.

2.9.8 In relation to development within the Green Belt, Policy GE6: Control Over Development in the Green Belt states:

“inappropriate development will not be allowed in the Green Belt unless justified by very special circumstances. Development within or conspicuous from the Green Belt must not harm the visual amenities of the Green Belt by reason of siting, materials or design”.

2.9.9 Whilst the Plan reiterates the purposes and land uses of Green Belts as detailed within PPG2 (detailed in paragraphs 2.2.2 and 2.2.4 above), it is considered that the essential characteristic of the Green Belt is its "permanence" and that its most important attribute is its "openness".

2.9.10 Coventry also has green wedge areas of Green Belt which are extensive tracts of open land which penetrate the built-up area from the countryside. It is stated with the Plan that they have a particular value in maintaining the openness and environmental quality of urban areas, assisting nature conservation, and providing people with access to the open countryside.

2.9.11 With the exception of the area of Coundon Wedge north of Pickford Way, the Green Wedges are less rural in character than other tracts of Green Belt and agriculture is often secondary to recreation. Given the overall deficiency in outdoor sports provision in the City, these areas of Green Wedge have a vital role in sustaining and expanding outdoor sport.

2.10 Emerging Coventry Local Development Framework

2.10.1 The City of Coventry Unitary Development Plan is currently under review in order to replace it with a new Local Development Framework.

2.10.2 The Issues and Options Report for the Core Spatial Strategy was published for consultation from 19th May 2006 until 30th June 2006. In relation to the Green Belt, the Issues and Options Report asked “Is there a case for reviewing the Green Belt boundaries (which could involve land swapping into and out the Green Belt)? The responses to the consultation were outlined within the “Response to Core Strategy Issues and Options” report, and included the following:

“about 70% of those responding to this question stated that the Green Belt boundaries should not be reviewed, as it could detrimentally affect valued green space and biodiversity and because development within the Green Belt should only be considered if strict sustainability criteria are met. Alternative views included: that areas no longer serving a Green Belt purpose should not be kept as such; that regular reviews of the Green Belt are needed to ensure that growth aspirations are met and to enable school development; and to ensure that development land is released in a planned manner in sustainable locations”.

- 2.10.3 The Council has recently published an "Emerging Core Strategy" and asked for comments by 19 December 2008. It is proposed that the Core Strategy be prepared alongside the production of the Regional Plan for the West Midlands. It is therefore anticipated that the Core Strategy will be submitted to the Planning Inspectorate for independent Examination in 2009 with the final adoption of the Core Strategy in 2009/2010.

2.11 Nuneaton and Bedworth Borough Local Plan 2006

- 2.11.1 The Nuneaton and Bedworth Borough Local Plan was adopted in 2006 and sets out the land use policies and proposals for the Borough to 2011.

- 2.11.2 The Plan sets out the key issues for the borough under the six headings of housing, employment, shopping, recreation, environment and transport. The key issues identified include:

- Using brownfield sites rather than greenfield;
- Smaller urban extensions rather than large allocations;
- Limited types of recreation within the Green Belt;
- Protect Green Belt.

- 2.11.3 Within the Plan, Green Belt is defined as:

“areas of land which are protected from development. Its purpose is to contain the sprawl of built up areas and prevent neighbouring towns from merging”.

- 2.11.4 There are various references to the Green Belt and its general protection within the Plan. However, Policy ENV1 "Green Belt" provides specific policy regarding development within the Green Belt. The Policy states:

“within the Green Belt development will not normally be permitted unless it is for:

- *Agriculture and forestry;*
- *Essential facilities for outdoor sport and outdoor recreation, for cemeteries and for other uses of land which preserve the openness of the Green Belt, and which do not conflict with the purposes of including land in it;*

- *Limited extension, alteration or replacement of existing dwellings;*
- *Limited infilling or redevelopment of major existing developed sites identified in adopted local plans”.*

2.11.5 It is considered that the Borough’s Green Belt is very sensitive as it helps maintain a significant area of open space between Nuneaton, Bedworth, Bulkington and Coventry, and that a key feature of Green Belt is its permanence and boundaries should only be changed in exceptional circumstances. There are four (two very minor and two major) changes proposed to the Green Belt as part of the Plan.

2.11.6 The Plan also identifies Areas of Restraint which are areas where the open character is protected because of the valuable contribution it makes to the character and structure of the urban area.

2.11.7 The overriding intention of Areas of Restraint is to protect their inherently open character. However, they do not have the permanence of the Green Belt and in the sequential approach to identifying land for future development, they come before Green Belt.

2.11.8 As there are no Areas of Restraint within the Green Belt study area, they are not a consideration during the identification of parcels to be taken forward for greater consideration and analysis.

2.12 Emerging Nuneaton and Bedworth Local Development Framework

2.12.1 Nuneaton and Bedworth Borough Council is currently in the process of reviewing the Local Plan in order to produce a Local Development Framework. The primary document, the Core Spatial Strategy is the initial document to be produced.

2.12.2 It is proposed that the Issues and Options for the Core Spatial Strategy will be published for consultation in 2009, and following publication of a Preferred Option, submission to the Secretary of State and a public Examination, it is expected that the Core Strategy will be adopted in 2012.

2.13 Rugby Borough Local Plan

2.13.1 The Rugby Local Plan provides the land use context for the future of Rugby Borough, and the identified strategy includes maintaining the Green Belt in the Borough.

2.13.2 Rugby has a substantial Green Belt lying to the west and north-west of the town which forms part of the strategic West Midlands Green Belt. Policy E2 “Green Belt” relates specifically to development within the Green Belt and states:

“Within the West Midlands Green Belt, there is a general presumption against inappropriate development. Such development will not be approved except in very special circumstances”.

2.13.3 The Plan states that the primary purpose of the policy is to protect the Green Belt from inappropriate development that would prejudice the open nature of the rural area and the character of the settlements within Rugby Borough. In considering proposals for development within the Green Belt, full regard is given to the extent to which the objectives defined in PPG2: Green Belts (1995) would be met by any development proposed.

2.13.4 It is emphasised within the Plan that Green Belt policy is in addition to other policies in the Plan, including the retention of employment land. In this instance, the identified major developed sites in the green belt are important to the local, sub-regional and regional economy and, therefore, any infill or redevelopment should be for employment purposes. Policy E3 “The use of existing buildings in the Green Belt” provides specific guidance within this context.

“proposals for the change of use, conversion or extension of existing buildings in the Green Belt will be permitted where all of the following criteria are met:

- *The buildings are of permanent and substantial construction, and are capable of conversion without major or complete reconstruction; and*
- *The proposed use and any associated use of land are in keeping with their surroundings and the proposed development does not have a materially greater impact than the existing on the openness of the Green Belt or on purposes of including land in it”.*

2.13.5 The Plan also recognises the benefits and contributions that land within the Green Belt can make to the delivery of growth in the future and already has a Policy within the Local Plan. Policy H5 “Safeguarded Housing Land” identifies parcels of land that may contribute to meeting the possible longer term needs of the area beyond 2016. In relation to employment, Policy ED4 “Major Developed Sites in the Green Belt” states that sites at Ryton-on-Dunsmore and Wolston are protected to ensure that any potential long term needs of these communities, particularly in their relationship to Coventry, would be met, if this should prove necessary. It is not envisaged however, that these sites would be developed in the longer term to meet the more general development requirements of Rugby Borough.

2.13.6 The sites at Ryton-on-Dunsmore and Wolston have been granted permission. The proposals, which were in accordance with Policies ED3 “Major Investment Sites” (MIS) and ED4 “Major Developed Sites in the Green Belt” included the Ansty MIS which 40 hectares to the north of the existing Rolls Royce employment area east of the A46, and which was approved for the construction of a High Technology Park; and the former Peugeot site north west of Ryton-

on-Dunsmore which is to be redeveloped for storage, distribution and general industry.

- 2.13.7 Whilst the purpose of a MIS is to help diversify and restructure the Regional economy, the Plan states that being in the Green Belt, the MIS development must be of good quality design, which incorporates sustainable development principles, and has a low visual impact on the surrounding area. Furthermore, to ensure the needs of people in accessing site, the new development should avoid encouraging dependence on car use, and must be well served by public transport and incorporate traffic management measures.

2.14 Emerging Rugby Local Development Framework

- 2.14.1 In October 2007, Rugby Borough Council published a Core Strategy Issues Paper for public consultation. This was the first phase of the production of a Local Development Framework.

- 2.14.2 Following on from the Issues Paper, the Council published the Options for the borough in January 2008 and Preferred Options in September 2008. The Preferred Option for the direction of growth of Rugby does not include urban extensions into the green belt. .

- 2.14.3 A Submission Version Core Strategy will be produced for public consultation in Spring 2009 and Public Examination is expected during Autumn 2009 with adoption of the Core Strategy in Spring 2010.

2.15 Warwick District Local Plan 1996-2011

- 2.15.1 The Warwick District Local Plan was adopted in December 2007 and covers the towns of Royal Leamington Spa, Warwick, Kenilworth and Whitnash.

- 2.15.2 The Plan sets out four main aims for the District which have been taken from the Government's definition of Sustainable Development. Each aim has specific objectives. These include:

- to maintain high levels of economic growth;
- to meet the housing needs of the whole community;
- to protect and enhance the natural environment;
- to maintain and enhance the quality of landscapes and townscapes; and
- to protect and improve the amenity of the local community.

- 2.15.3 Within the Plan, Green Belt is defined as:

"land allocated within the development plan for the district to prevent urban sprawl by keeping land permanently open. Guidance on Green Belt policy is contained in PPG2".

- 2.15.4 Throughout the Plan, particularly in relation to the rural areas, reference is made to the Green Belt and the consideration it must be given in relation to any planning proposals.
- 2.15.5 Specific policies relating to the Green Belt are detailed within the "Designated Area Policies" of the Plan. Policy DAP1: Protecting the Green Belt, states that

"within the Green Belt there will be a general presumption against inappropriate development and that some development would only be permitted in appropriate instances. This includes:

- *agriculture, forestry, and cemeteries;*
- *essential facilities for outdoor sport and recreation in accordance with policy RAP13;*
- *new dwellings in accordance with policy RAP1;*
- *limited extension, alteration or replacement of existing dwellings in accordance with policies RAP2 and RAP3;*
- *development within major developed sites in accordance with policy SSP2;*
- *conversion proposals for rural buildings in accordance with policy RAP7;*
- *proposals for Park and Ride facilities; or*
- *other uses of land which preserve the openness of the Green Belt and do not conflict with the purpose of including land within it".*

- 2.15.6 The Plan states that the Green Belt seeks to prevent urban sprawl that would prejudice the open nature and rural character of the area and that the primary purpose of Policy DAP1 is to protect the Green Belt from inappropriate development that would prejudice the open nature of the rural area and the setting of the settlements within the District. The Plan further states that the Council supports the role of the Green Belt in accordance with Government guidance as contained in PPG2.

- 2.15.7 The Plan also contains Site Specific Policies for the District. In line with PPG2, Policy SSP2 "Major Developed Sites in the Green Belt" allows for appropriate limited infilling and redevelopment for employment or other uses on specifically identified sites. Government policy recognises the presence of established developments and provides a framework for some development to take place within them where this would help secure jobs and prosperity and improve the environment of the Green Belt.

2.16 Emerging Warwick Local Development Framework

- 2.16.1 In November 2007 Warwick District Council published a Key Issues Document for public consultation. The responses to the Issues Document informed the Options Report which was published for consultation in May 2008.

- 2.16.2 The Options Report builds upon the objectives outlined within the Issues Paper and includes protecting and enhancing green spaces as well as the natural environment. The report states that this is considered to be one of the three top priorities for the district, and that 55% of people consider it would be acceptable to allocate some greenfield land on the edge of towns for development to meet growing needs.
- 2.16.3 It is outlined within the Options Report that of the 10,800 dwellings required within the district between 2006 and 2026, 2,650 dwellings are accounted for, resulting in the need to identify land for a further 8,150 dwellings.
- 2.16.4 It is assumed within the Options Report that there will be capacity within the towns to accommodate some of the growth but that some greenfield development will be inevitable. Green Belt land has not been excluded from consideration, but where it is considered, the aim will be to maintain proper separation between the towns and to avoid coalescence.
- 2.16.5 Within the report, five options for the distribution of the required housing have been identified. All five options identify that greenfield urban extensions would allow for new facilities and services and that they would make the best use of existing public transport and infrastructure where appropriate. At the same time, all five options also identify that development on greenfield sites will be inevitable and that there may be the need to amend the current Green Belt boundaries.
- 2.16.6 The Options Paper also identifies possible directions of growth to the towns. In relation to this study to identify locations for future development, the following directions of growth are relevant.
- Land north of Milverton, Leamington Spa
 - Land north of Lillington, Leamington Spa
 - Land east of Lillington, Leamington Spa
 - Land west and north west of Warwick
 - Land west and north west of Kenilworth
 - Land north east of Kenilworth
 - Land south east of Kenilworth
 - Land south of Kenilworth
 - Land south of Coventry – Kirby Corner
 - Land south of Coventry – Finham
 - Land south of Coventry – Baginton
- 2.16.7 Having undertaken consultation upon the Options, it is proposed to publish the Preferred Options for consultation in Spring 2009, with submission to the Secretary of State in January 2010 and adoption of the Core Strategy in autumn 2010.

3.0 Background Documentation

3.1 Overview

3.1.1 The purpose of this section is to identify background documents that are relevant to Green Belt land and the assessment of Green Belt land for safeguarding for future development.

3.1.2 Documents reviewed that are considered to be relevant to the review of Green Belt land for safeguarding include:

- Coventry City Council Level 1 Strategic Flood Risk Assessment (January 2008);
- Coventry Green Space Strategy (2008);
- Coventry Urban Fringe Assessment: Landscape Assessment and Guidance (March 2007);
- Coventry Green Belt Review (December 2007) ;
- Design Guidelines for the Development in Coventry's Ancient Arden – An Historic Landscape Area (May 1995);
- Landscape Assessment of the Borough of Nuneaton and Bedworth: Sensitivity and Condition Study (August 2008);
- Warwickshire County Council Level 1 Strategic Flood Risk Assessment (February 2008);
- Warwickshire, Coventry and Solihull Local Biodiversity Action Plan 2001-2007;
- Landscape Assessment of the Borough of Rugby: Sensitivity and Condition Study (April 2006)
- Warwickshire Landscape Guidelines (1994).

3.2 Coventry City Council Level 1 Strategic Flood Risk Assessment

3.2.1 In August 2007, Coventry City Council, Solihull Metropolitan Borough Council and the County, Districts and Boroughs of Warwickshire, commissioned Halcrow to produce a Level 1 Strategic Flood Risk Assessment (SFRA) in accordance with Planning Policy Statement 25 (PPS25) "Development and Flood Risk".

3.2.2 The purpose of the SFRA is to assess all forms of flood risk, including groundwater, surface water, sewer and river sources, and use this as an evidence base to locate development primarily in low flood risk areas. In accordance with PPS25, areas of low, medium and high flood risk have been identified.

3.2.3 The SFRA identifies therefore, that land within Flood Zone 1 has a low probability (less than 1 in 1000) of flooding in any year; land within Flood Zone 2 has a medium probability (between 1 and 100 and 1 in 1000) of flooding in any year; and land in Flood Zone 3a has a high probability (1 in 100) of

flooding. Land identified within Flood Zone 3b is considered to be a functional flood plain.

3.2.4 In addition and the probability of flood risk, the SFRA provides information regarding flood management and defences as well as a flood warning system and a flood response plan. It also provides guidance for developers in terms of what would be required in relation to development proposals within Zone 1.

3.2.5 Assuming development proposals falling within Flood Zone 1 include appropriate mitigation measures, the SFRA does not indicate any requirement for further flood risk assessment. However, proposals falling within Flood Zones 2 or 3a are recommended to include a Level 2 SFRA which is more site specific and detailed. It is indicated, however, within the SFRA, that development upon land within Flood Zones 2 and 3a would only be permitted in exceptional circumstances.

3.3 Coventry Green Space Strategy

3.3.1 The Coventry Green Space Strategy has been developed to provide a strategic framework for the future management of Coventry City's parks and green spaces whilst also addressing the requirements of Planning Policy Guidance (PPG 17). The document identifies the vision Coventry City Council has for green space. It is:

"To provide attractive, high quality accessible green spaces that are well maintained, safe, clean and are important to local people. This will be achieved through clear, open and robust planning policies that ensure that green space contributes to local character and plays an important role in everyday life of residents whilst supporting the regeneration of the city."

3.3.2 It is identified within the strategy that the aim of the document is to maintain the quality and high standards of Coventry's Green Spaces. The Green Spaces identified within the strategy range from parks and open space, outdoor sports, natural green space, provision for children and young people, allotments and churchyards. The document also sets out nine Action Plans which amongst others aim to:

- manage the green space network;
- work with the local community and other key stakeholders to meet the needs of the local people;
- protect and improve the green space network to ensure high quality standards;
- make green spaces accessible by all, ensuring that funds are available to maintain the future of Coventry's green spaces; and
- enjoy and safeguard the future of the wildlife resources Coventry has on offer.

3.3.3 Whilst the Green Space Strategy does not specifically provide guidance in relation to the Green Belt, it does identify that Coventry has a tightly bounded Urban Area constrained by the Warwickshire and West Midlands Green Belt. Furthermore, the Strategy highlights the importance of Policy GE1 Green Environment Strategy within the City of Coventry Unitary Development Plan (1996-2011) which as detailed within section 2.9.3 above, identifies Green Space Standards for the city and highlights the need to maintain the Green Belt whilst protecting the Green Wedges and the Arden Countryside from inappropriate development.

3.4 Coventry Urban Fringe Assessment: Landscape Assessment and Guidance

3.4.1 Completed in March 2007, the Coventry Landscape Assessment & Guidance was commissioned to review the cultural and physical character change that has taken place across the landscape of Ancient Arden which is located towards the north western fringe of Coventry. The aim of this study was to assess how the landscape of the different parts of Ancient Arden have changed and to assess which areas need to be conserved, restored or enhanced. The study has three main objectives:

- to review the character and condition of the landscape
- review recent management/conservation activity
- identify forces for change and management priorities

3.4.2 The study highlights four main themes which assesses how the landscape has changed in Ancient Arden. These are:

- Woodland & Trees
- Field boundaries
- Land Management
- Highways

3.4.3 It is highlighted within the Landscape Assessment the significant shift in farming methods over the past years and its effect on the landscape character. The study concludes that much has been achieved with regard to landscape and that Green Belt policies have protected the area from uncontrolled development and have contributed to maintaining the clear distinction between town and country, whilst avoiding sub urbanisation of the landscape which is often apparent along Green Belt fringes.

3.5 Coventry Green Belt Review

3.5.1 The Coventry Green Belt Review was undertaken in 2007. The aim was to review the whole of the Green Belt in order to establish if there is the potential to remove land from within the Green Belt in order to meet the shortfall in the development land supply for Coventry City. A key focus of the assessment was

to review the opportunities within the Green Belt that would have the least detrimental effect on the existing Coventry Green Belt.

3.5.2 The Coventry Green Belt Review 2007 identifies seven criteria for assessing which land would be most suitable for development to meet the shortfall in supply. The criteria identified include:

- Green Belt designations would result in modest visual impact on the open character of the Green Belt
- Green Belt designations would not harm or detract from views of the city centre or nearby historic towns
- Release of green wedge areas of Green Belt for development will result in continuation of the linear cohesion and openness of the green wedge
- Addition of designated Green Belt land (including in green wedges) would significantly enhance the purposes, character or cohesion of the Green Belt.
- Designated Green Belt land would not damage areas of significant nature conservation value i.e. SSSI's
- Designated Green Belt land will not be included within the floodplain
- Designated Green Belt land would be capable of being developed in a sustainable way whilst being readily integrating with the existing built up area.

3.5.3 The above criteria were applied to land within Green Belt locations which had been sub-divided into three categories. Firstly, an assessment was made of the two areas for potential urban extensions of Eastern Green and Keresley. Secondly, the criterion was used to assess the other areas of the peripheral Green Belt around the city and finally the green wedge areas of the Green Belt.

3.5.4 In conclusion, the review highlights the importance of Coventry in meeting its housing targets of 33,500 dwellings over the period 2006 – 2026. In accordance with the criteria set out within the review, the Review concludes by recommending nine sites to be removed from the Green Belt, four sites where further investigation is needed before removal from the Green Belt, and three sites which have been designated in previous development plans have been recommended for areas to be designated as Green Belt.

3.5.5 It is considered that the review highlights the importance of safeguarding the Green Belt land in accordance with PPG2 as well as the importance of phasing development where Green Belt land could be used in the future for housing development. It is further considered that the regeneration function of the Green Belt must be maintained and protected.

3.6 Design Guidelines for the Development in Coventry's Ancient Arden – An Historic Landscape Area

3.6.1 This study was undertaken in order to provide local design guidelines for developers, land managers and local residents who wish to develop within the

open countryside of Coventry's Ancient Arden. The objective was to encourage more sensitive proposals for development within Coventry's Ancient Arden and enable new buildings to integrate with this historic landscape based on the local vernacular tradition and materials.

3.6.2 The key aims of the design guidance is "to provide the buildings and infrastructure that present day society – after measured reflection – decides it needs, but in a way that retains local distinctiveness and the essential visual harmony of the countryside."

3.6.3 This guidance sets out the local design guidelines to the following:

- New Dwellings
- House Extensions
- Conversion of redundant farm buildings
- New farm buildings
- Other built developments and highways guidelines in the Arden landscape.

3.6.4 Whilst new development is permitted, the design guidelines highlight the importance of Green Belt policies to the Ancient Arden landscape and state that this is a substantial constraint to development.

3.7 Landscape Assessment of the Borough of Nuneaton and Bedworth: Sensitivity and Condition Study

3.7.1 The Landscape Assessment of the Borough of Nuneaton and Bedworth is a broad scale landscape assessment and sensitivity analysis of the Borough looking in detail at the countryside around the urban fringe of the two towns as well as the northern part of Coventry.

3.7.2 Adopted August 2008, the study area of the assessment includes:

- Arden, Ancient Arden
- Arden, Parklands Arden
- Arden, Industrial Arden
- Mease Lowlands, Estate Farmlands
- High Cross Plateau, Open Plateau
- High Cross Plateau, Village Farmlands

3.7.3 The overall sensitivity of the Arden Landscape Character is considered to be either or moderate or high. This is due to the high cultural sensitivity within the Ancient Arden and the Arden Parklands. However, the condition and quality of the Ancient Arden landscape in some areas is identified as declining, as is the Industrial Arden landscape. The decline, particularly in relation to the Ancient Arden landscape, is as a result of modern farming methods and the conversion from pasture to arable farming, and in the Industrial Arden Landscape due to the widespread hedgerow removal resulting in a landscape of poor condition.

- 3.7.4 The High Cross Plateau village farmlands are of significance within the Borough, due to the coherent and historic cultural pattern. However, the predominance of arable farmland has rendered the majority of hedgerows redundant and their condition is generally weak. Only where pockets of pasture exist does the condition fare slightly better. They are nevertheless still in decline.
- 3.7.5 Finally, the Mease Lowlands are considered to give rise to low overall sensitivity, and due to the dominance of arable farming, the redundant hedgerows have resulted in a weak or a landscape in decline.

3.8 Warwickshire County Council Level 1 Strategic Flood Risk Assessment

- 3.8.1 In August 2007, Coventry City Council, Solihull Metropolitan Borough Council and the County, Districts and Borough Councils of Warwickshire commissioned Halcrow to produce a Level 1 Strategic Flood Risk Assessment (SFRA).
- 3.8.2 The SFRA was commissioned in order to inform the location of minerals and waste sites and therefore, does not comment on other built forms of development such as housing and employment. However, reference is made to all water courses within Warwickshire and details are given in relation to any flood defences in place within the Boroughs and Districts.
- 3.8.3 The SFRA is a strategic document which refines information on the probability of flooding, taking sources of flooding (such as surface water, ground water, foul and combined sewers, canals and reservoirs) and the impacts of climate change into account.
- 3.8.4 The SFRA provides the basis for applying the sequential test, which is the process which seeks to locate development in appropriate flood zones, based on the development's vulnerability classification. In accordance with PPS25, the SFRA identifies areas of low, medium and high risk of flooding.
- 3.8.5 The SFRA states that the aim of PPS25 is to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.

3.9 Warwickshire, Coventry and Solihull Local Biodiversity Action Plan 2001-2007

- 3.9.1 Completed in 2006, the Warwickshire, Coventry and Solihull Local Biodiversity Action Plan (LBAP) outlines how the characteristic wildlife and landscapes of the sub-region will be protected. Contributing to national biodiversity targets, as well as setting local targets, the LBAP consists of a series of habitat and species Action Plans which provide measurable targets as well as outlining the mechanisms for achieving them.

- 3.9.2 As part of the LBAP, Warwickshire County Council has produced a Biodiversity Strategy which is currently out for consultation. Within the Strategy, Biodiversity is defined as:

"Biodiversity encompasses the whole variety of life on Earth. It includes all species of plants and animals, but also their genetic variation, and the complex ecosystems of which they are a part. It covers the whole of the natural world, from the commonplace to the critically endangered."

- 3.9.3 In 2007, the first progress report was produced outlining the impacts that the LBAP has upon the sub-region. Whilst in some instances little progress had been made, the report details successes such as new habitat creation schemes, new wetlands & woodlands and increases in some priority species.

3.10 Landscape Assessment of the Borough of Rugby: Sensitivity and Condition Study

- 3.10.1 The Landscape Assessment of the Borough of Rugby is a broad scale landscape assessment and sensitivity analysis of Rugby, looking also in detail at the countryside around the urban fringe of the Borough.

- 3.10.2 Adopted April 2006, the aim of the study was to examine the character of the landscape around the town, its sensitivity to change, the condition of the countryside abutting Rugby's urban fringe and beyond, and to demonstrate how the outcomes could be used as a decision tool in the planning process.

- 3.10.3 It is considered that the Landscape Assessment would enable practitioners to both understand and interpret the character and sensitivity of the landscapes within Rugby Borough and to make more informed judgements when considering the capacity of the urban fringe to accommodate change.

- 3.10.4 The Landscape and its analysis of sensitivity were looked at separately. The key areas were:

- Its fragility of inherent character (both cultural sensitivity and ecological sensitivity)
- Its Visual sensitivity
- Its Overall sensitivity

- 3.10.5 The study concluded that the overall sensitivity of the rural landscape on the outer edge of Rugby is considered to be high, although there are pockets, such as the Dunsmore Parklands landscape character which are located adjacent to the Coventry boundary, where ecological, cultural and visual sensitivity is considered to be either of low or a moderate sensitivity and generally considered to be in decline.

3.11 Warwickshire Landscape Guidelines

- 3.11.1 The Warwickshire Landscape Guidelines is a series of documents which collectively aims to identify and understand what makes the area distinctive. The Guidelines comprise five documents, however only four are relevant to this particular study. In addition to the Landscape Assessment of the Borough of Rugby: Sensitivity and Condition Study as outlined above, the Warwickshire Landscape Guidelines include:
- Arden Landscape Guidelines;
 - Avon Landscape Guidelines; and
 - Dunsmore Landscape Guidelines.
- 3.11.2 The Arden, Avon and Dunsmore Landscape Guidelines documents provide a comprehensive assessment of the Warwickshire Landscape, based upon a detailed study of existing written and mapped information as well as a valuation of recent changes which have affected the landscape as well as current issues which are likely to influence change in the future.
- 3.11.3 They provide landscape management information as well as guidance on how development and modern land management practices can best be integrated into the landscape. Whilst they also identify areas of strong landscape character and those areas where enhancement is require, the overall aim of the Landscape Guidelines is to ensure the diversity of the landscapes are conserved for present and future generations to enjoy.

4.0 Methodology

4.1 Overview

4.1.1 The purpose of this section is to outline the methodology used to assess the parcels within the Green Belt study area for further consideration. The methodology has been implemented in four key phases.

- Phase 1: Sub-division of the study area
- Phase 2: Assessment against the purposes of Green Belt
- Phase 3: Further analysis
- Phase 4: Scoring

4.2 Phase 1: Sub-division of the study area

4.2.1 The outer boundaries of the study areas for the assessment were provided by Coventry, Nuneaton and Bedworth, Rugby and Warwick Councils and set out within the initial Project Brief (Appendix 1). The boundaries supplied by the Council's were plotted upon electronic copies of Ordnance Survey maps.

4.2.2 The initial study areas were identified based around the four specific urban areas of the study - Coventry, Kenilworth, Nuneaton and Bedworth and Warwick and Leamington Spa. Therefore, whilst the individual authorities provided the outer boundaries, the subsequent sub-areas created cross administrative boundaries (as detailed below). For example, some parcels that are within the administrative area of Nuneaton and Bedworth also relate to Coventry City and are therefore included within the analysis for both Coventry and Nuneaton and Bedworth. This is also the case for parcels that are within Warwick District which relate both to Kenilworth and Coventry City.

4.2.3 In order for the review to be manageable and to ensure that all the land is assessed in a fair and transparent way, the study area has been sub-divided into smaller parcels of land. The division of the study area was based upon advice contained within PPG2 that boundaries should be clear and based upon strong physical features.

4.2.4 In the first instance, radial lines were identified that emanated from the urban edge of Coventry, Kenilworth, Nuneaton, Bedworth, Warwick and Leamington Spa and progressed into the Green Belt to the edge of the outer boundaries. The radial lines were identified based upon physical features including:

- Roads;
- Railway tracks;
- Watercourses; (Rivers; Canals; Brooks) and
- Main footpaths.

4.2.5 Overall, the process resulted in a number of large sub-areas being created within the study area as detailed in Table 1 below.

Table 1: Number of Sub-Areas Created

Study Area	Number of Sub-Areas
Coventry	22
Kenilworth	9
Nuneaton and Bedworth	8
Warwick and Leamington Spa	11

4.2.6 It was determined that the sub-areas created at Kenilworth were of a suitable size for the review and that the parcels could be assessed in a fair and transparent manner. In relation to Coventry, Nuneaton and Bedworth, Warwick and Leamington Spa, the sub-areas were considered to be too substantial in size to result in a meaningful analysis. Therefore, each sub-area was further divided internally into smaller parcels, using the criteria included at 4.2.4 above as well as field boundaries and bridleways.

4.2.7 At this point, the Steering Group consisting of representatives from each of the four Authorities were consulted on the parcels that had been identified. The parcels were agreed with Coventry, Rugby and Nuneaton and Bedworth Councils. However, Warwick District Council requested that Parcel WL5 in relation to Warwick and Leamington Spa be sub-divided into two parcels, WL5a and WL5b due to the natural boundaries as a result of the A429. In order to be consistent, parcel WL6 was also split into WL6a and WL6b along the A452.

4.2.8 This resulted in a large quantity of parcels being identified. Table 2 below outlines the number of parcels created and Figures 2.1 to 2.4 in Appendix 2 detail the boundaries of the parcels identified for analysis within the four study areas.

Table 2: Number of Sub-Areas Created

Study Area	Number of Sub-Areas	Number of Parcels
Coventry	22	73
Kenilworth	9	9
Nuneaton and Bedworth	8	22
Warwick and Leamington Spa	11	13

4.3 Phase 2: Assessment against the purposes of Green Belt

4.3.1 Having sub-divided the study areas into manageable parcels, an initial sieve of parcels was undertaken. Each parcel was assessed against the five purposes of the Green Belt as detailed within PPG2. This was undertaken in order to

establish the extent to which each individual parcel on its own merits, contributed to achieving the five purposes.

4.3.2 As detailed in 2.3.2 above, the five purposes of the Green Belt are identified as being of equal importance and are considered to be the most important element of the national policy. The five purposes of the Green Belt are:

1. to check unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns from merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4.3.3 In order to assess the parcels of land within the study area against the five purposes, a view was taken on how the purposes would be applied, particularly in relation to the parcels of land that are disconnected from the urban areas. The following were therefore determined:

- In relation to Purpose 1 “large built up areas” was considered to include any built area, including villages;
- In relation to Purpose 2 “neighbouring towns” was considered to include neighbouring built areas, including villages;
- In relation to Purpose 3 “safeguarding the countryside from encroachment” was considered to mean the wider countryside i.e. unrestricted, not inhibited by built areas or infrastructure;
- In relation to Purpose 4 this sought to reflect the setting and character of the towns and villages. In the case of Coventry the Meriden Gap was acknowledged as part of the character;
- In relation to Purpose 5 it was considered that all parcels of land within the green belt contributed by their nature and designation, to encouraging the recycling of derelict and other urban land.

4.3.4 Each parcel of land was assessed against the five purposes and the outcomes recorded. In order to eliminate from more detailed study those parcels that, based upon their own individual merits, contributed the most to achieving the purposes of the Green Belt, it was determined that for each purpose the individual parcel achieved, a point would be awarded.

4.3.5 Those individual parcels that achieved four or five of the purposes, as identified within National Guidance which determines the inclusion of land within a Green Belt, were considered to contribute the most to the purposes of Green Belt and were therefore identified to be retained within the Green Belt and eliminated from further analysis. It was considered that if the parcel achieved four or five of the criterion on their own merit they were valuable to the Green Belt.

4.3.6 Parcels that based upon their own individual merits achieved three or less of the purposes, were taken forward for more detailed study. It was considered that each of these parcels although contribute to the Green Belt in some way, do not contribute as significantly as those that achieved four or five of the identified purposes.

4.3.7 The extent to which each parcel achieved the five purposes is detailed within schedules 1 to 4 in Appendix 3. Figures 3.1 to 3.4 in Appendix 4 provide a visual representation of those parcels eliminated and those parcels taken forward for more detailed study. Table 3 below identifies the number of parcels identified to be retained in the Green Belt and the number taken forward for more detailed study.

Table 3: Number of Parcels Eliminated and Taken Forward

Study Area	Total Number of Parcels	Number of Parcels Eliminated	Number of Parcels taken forward
Coventry	73	25	48
Kenilworth	9	6	3
Nuneaton and Bedworth	22	6	16
Warwick and Leamington Spa	13	7	6

4.4 Phase 3: Further analysis

4.4.1 Having identified and eliminating those parcels which contributed the most significantly to the purposes of Green Belt, the third phase of the assessment involved subjecting the remaining seventy three parcels to a more detailed analysis in order to identify those parcels that could be analysed in greater detail and considered by the four Authorities within their Core Strategies for future development.

4.4.2 There are five elements to this phase of the assessment that have been used to assess the parcels:

- Primary Constraints
- Secondary Constraints
- Existing or Proposed Development
- Landscape Assessment
- Connectivity to the urban area

Primary Constraints

4.4.3 Primary constraints were considered to be those aspects that are immovable such physical matters and national designations. The primary constraints that were identified within each of the study areas are visually represented on Figures 4.1 to 4.4 in Appendix 5 and include:

- **Ancient Woodlands**
Planning Policy Statement 9 “Biodiversity and Geological Conservation” states that “Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. They should not grant planning permission for any development that would result in its loss of deterioration unless the need for, and benefits of, the development in that location outweigh the loss of the woodland habitat”.
- **Registered Parks and Gardens**
The National Record of the Historic Parks and Gardens identifies those which are considered to make a rich and varied contribution to our landscape. Although inclusion of a Historic Park or Garden on the Register in itself brings no additional statutory controls, local authorities are required by central government to make provision for the protection of the historic environment in their policies and their allocation of resources. Inclusion on the Register is a material consideration in planning terms.
- **Sites of Special Scientific Interest (SSSI’s)**
Sites of Special Scientific Interest are designated by English Nature and are given protection against destruction and activities which are considered to be damaging. They are considered to be the country’s very best wildlife and geological sites and are important as they support plants and animals that find it more difficult to survive in the wider countryside. The Natural Environment and Rural Communities Act 2006 (‘the Wildlife and Countryside Act’) gives English Nature the power to ensure SSSI’s are protected and managed effectively now and in the future.
- **Scheduled Ancient Monuments (SAM’s)**
Scheduled Ancient Monuments are designated with the aim of preserving significant examples of the archaeological resource for the educational and cultural benefit of future generations. Once a site is scheduled, consent must be obtained from the Secretary of State for any works that affect it. It is a criminal offence to carry out unauthorised ‘works’ on a scheduled site. It is also an offence to cause either intentionally or through recklessness, damage to a scheduled monument.
- **Flood Zones**
Planning Policy Statement 25 “Development and Flood Risk” states that flooding threatens life and causes substantial damage to property. It further states that the aims of planning policy on development and flood risk are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. The Flood Zones have been considered taking into account the effects of

climate change in accordance with the four Authorities Joint SFRA and Planning Policy Statement 1: Delivering Sustainable Development.

Secondary Constraints

4.4.4 Secondary constraints were considered to be those aspects that are of local importance and those that are considered to have an impact on development. Whilst they were still identified as constraints, they are generally considered less significant than a primary constraint. The secondary constraints that were identified within each of the study areas are visually represented on Figures 5.1 to 5.4 in Appendix 6 and include:

- **Local Nature Reserves (LNR's)**

Local Nature Reserves are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 and are places with wildlife or geological features that are of special interest locally. As they support habitats and species that are important at a local (and often national) level.

- **Conservation Areas**

Conservation Areas are locally designated based upon special characteristics and features. They give broader protection than listing individual buildings as all characteristics and features are recognised as part of its character. Within a conservation area the local authority has extra planning controls over any type or size of development and protection against development affecting the setting of a Conservation Area.

- **Green Wedges**

Green Wedges applies only to the Coventry study area as it relates specifically to designations within the Coventry Development Plan (CDP) 2001. The CDP states that Green Wedges are areas of Green Belt which form extensive tracts of open land penetrating the built-up area of Coventry from the countryside beyond and include remnants of the Arden landscape. They are considered to have a particular value in maintaining the openness and environmental quality of urban areas, assisting nature conservation, and providing people with access to the open countryside. Attention is given to the protection, conservation and enhancement of Green Wedges.

- **Sites of Important Nature Conservation (SINC's)**

Sites of Important Nature Conservation are designations applied to important non-statutory designated sites of substantive ecological or geological/geomorphologic value. While identified sites do not receive statutory protection they are offered protection through Development Plans as they are considered to be of substantive nature conservation importance.

- **Regionally Important Geological Sites (RIGS)**

Regionally Important Geological Sites are similar to SINC's in that designations are applied to important non-statutory designated sites of substantive ecological or geological/geomorphologic value. While identified sites do not receive statutory protection they are offered protection through Development Plans as they are considered to be of substantive nature conservation/geological importance.

- **Rail Tracks**

The presence of rail tracks can be a constraint to development by providing a physical boundary and form of separation and also through noise pollution. Planning Policy Guidance 24 "Planning and Noise" states that noise can have a significant effect on the quality of life enjoyed by individuals and communities and that the impact of noise can be a material consideration in the determination of planning applications. It is considered that noise-sensitive developments should be separated from major sources of noise such as rail transport.

- **Main Roads**

The presence of main roads can be a constraint to development by providing a physical boundary and form of separation and also through noise pollution. As stated above, PPG24 considers that noise-sensitive developments should be separated from major sources of noise. Road noise is included within this.

- **Main Footpaths**

Main Footpaths relates to two specific trails within the study areas. Coventry Way was established in the 1970's and now consists of a number of routes through the Warwickshire countryside along areas of landscape, wildlife, historic and architectural interest. Centenary Way was proposed by the County Council to celebrate its centenary in 1989, and was opened in 1991. Running roughly north to south through the county, Centenary Way includes quiet and low-lying countryside, numerous country parks and canals.

- **Canals**

The presence of the canal can be a constraint to development by providing a physical boundary and form of separation. Being 38 miles long with 13 locks, the Coventry Canal forms part of the Warwickshire Ring and the Leicestershire Ring and forms an important link between the northern and southern canal networks.

Existing or proposed developments

- 4.4.5 Existing or proposed developments were identified within the study areas as locations where there are currently existing built developments or developments that have been granted planning permission. As existing or permitted developments can have a significant impact upon a locality, it was

determined that they should be taken into consideration as part of the further detailed analysis.

4.4.6 It was identified however, that some of the parcels contain existing development that was already well established and which in itself, contributed significantly to the landscape and setting within the study areas. Therefore, it was determined that existing or proposed development would not include villages, farms or established farm buildings. Existing or proposed development does therefore include:

- Inter war and post war residential development;
- The Warwick University expansion;
- Existing employment areas;
- Existing employment permissions (e.g. the Ansty Area & Peugeot);
- Major junction improvements; and
- Commercial uses.

Landscape Value

4.4.7 The landscape value element of the assessment has been undertaken by Richard Morrish Associates and David Brown Landscape Design.

4.4.8 Whilst landscape and visual matters are not directly cited in the five purposes of PPG2, they do have a particular bearing on the 'preservation of the setting and special character of historic towns' and 'safeguarding the countryside from encroachment'.

4.4.9 It is considered that all land included within the present Green Belt should contribute to the planning purposes. However, some areas may make a lesser contribution than others and be less essential to Green Belt purposes and objectives. The value of the landscape within each of the parcels was therefore considered in relation to the contribution it makes to the Green Belt.

4.4.10 The methodology for assessing the value of the landscape in relation to the Green Belt was undertaken in line with "Guidelines for Landscape and Visual Impact Assessment" (2nd Edition 2002).

4.4.11 During the assessment of the value of the landscape to the Green Belt reference has been made to previous landscape studies of the area, including:

- Design Guidelines for Coventry's Ancient Arden (1995)
- The Countryside Agency Landscape Character Map of Britain (1999)
- The Warwickshire Landscapes Guidelines (1993)
- The Borough of Rugby Landscape Assessment (2006)
- Coventry Urban Fringe Landscape Assessment (2007)
- Nuneaton and Bedworth Borough Landscape Assessment (2008)

- 4.4.12 Information has also been gained from reviewing information on geology, ecology, archaeology and national planning designations. A topographical analysis has helped to identify some principle viewsheds within the study areas. These are visually represented on Figures 6.1 to 6.3 in Appendix 7.
- 4.4.13 Figure 7.1 in Appendix 8 details the Landscape Character Areas relevant to the Study areas based upon the Countryside Agency's Landscape Classifications. Figure 8.1 to 8.3 in Appendix 9 further identify the Landscape Character Types based upon the Warwickshire Landscape Guidelines.
- 4.4.14 Each parcel within the study areas has been visited on at least two occasions in order to assess its landscape value and visual attributes. Photomontages within Appendix 10 provide visual representation of the views from the study areas. The information gathered has confirmed and refined the outcomes of the desktop study. Important views to historic cores have been noted and the potential for landscape improvements have also been assessed. The results of the landscape value assessment contribute to identifying parcels where there may be potential for the release of land for future development and where further, more detailed examination would be appropriate.
- 4.4.15 Following the desk study and field analysis of the value that the landscape within the parcels contributes to the Green Belt, each parcel was determined as being either of higher, medium or lower landscape value to the Green Belt. The three categories used to determine the higher, medium or lower value are:
- **Higher Value**
The parcel is considered to have high value for Green Belt function and for the objectives of land defined by Green Belt policy. Removing these areas from the Green Belt or allowing major development within them would diminish the setting and character of existing settlement. Minor landscape enhancements such as new hedge and tree planting or improvements to footpath networks might further enhance the value of the landscape to the Green Belt function.
 - **Medium Value**
The parcel is considered to have medium value for Green Belt function due to degraded landscape characteristics (e.g. loss of field pattern, woodland degradation and urban fringe activities). These parcels could benefit from specific enhancement works including the creation of new multi-use corridors for conservation and public recreation.
 - **Lower Value**
These parcels are considered to make a less valuable contribution to the Green Belt in comparison to other parcels. Further studies should be undertaken to examine whether there are opportunities for urban expansion in these areas.

- 4.4.16 Schedules 5 to 8 within Appendix 11 provide summaries of the landscape value assessment for the parcels.

Connectivity to the Urban Area

- 4.4.17 Connectivity of the individual parcels to the urban area was the final element of the further analysis. Whilst the purpose of this study is not to identify specific sites to be removed from the Green Belt for future development, rather to identify more specific parcels of land for the four Local Authorities to consider in greater detail through their Core Strategies, it is considered that in order for a site to come forward for development in the future, it must be in some way connected to the urban area. It would not be considered appropriate for a parcel to be taken forward for detailed site identification if it is not connected to an urban area.
- 4.4.18 Three categories were therefore established and each parcel assessed in relation to these. The three categories are:
- The parcel physically connects to an urban area
 - The parcel is connected to the urban area through another parcel which is directly connected to the urban area
 - The parcel does not connect with the urban area.

4.4 Phase 4: Scoring

- 4.5.1 In order to establish which parcels of lands should be taken forward for site identification for future development, and in order to identify a hierarchy that parcels should be considered and further analysed to identify specific sites for development, a scoring system was established to assess the five elements of the analysis. Table 4 sets out the structure of the scoring system.

Table 4: Scoring System for Detailed Study

Primary Constraints	Primary Constraints.	2 points
	Additional Points:	
	– Contains Flood Zone 2.	2 points
	– Contains Flood Zone 3a.	3 points
	– Contains Flood Zone 3b	4 points
– Multiple constraints (i.e. 2 or more of the same constraint).	1 point	
– Parcel borders a Primary Constraint.	1 point	
Secondary Constraints	Secondary Constraints.	1 or 0.5 points each
	Additional Points:	
	– Parcel borders a secondary constraint.	0.5 points
– Multiple constraints (i.e. 2 or more of the same constraint).	0.5 points	
Existing Developments and Permissions	The parcel contains no development and there are no current permissions.	3 points
	The parcel contains development or there is a current permission.	2 points
	The parcel contains development and there are current permissions.	1 point
Landscape Value Assessment	The landscape of the parcel is considered to be of higher value.	3 points
	The landscape of the parcel is considered to be of medium value.	2 points
	The landscape of the parcel is considered to be of lower value.	1 points
Connectivity	The Parcel is connected to an urban area.	0 points
	The parcel is connected to the urban area through an adjoining parcel.	1 point
	The parcel is not connected to the urban area.	2 points

4.5.2 As the primary constraints are those aspects that are immovable such as physical matters and national designations, it was considered that for each constraint identified within a parcel 2 points would be awarded. However, it was also identified that within some parcels there may be instances where additional points should be awarded.

- 4.5.3 Such instances include when there were multiples of the same constraints within an individual parcel in which instance an extra point was added per multiple constraint. For example, if a parcel contained two Ancient Woodlands, it would score 2 points for the constraint and an additional 1 point for a multiple constraint.
- 4.5.4 Additional points were also awarded where a parcel bordered a primary constraint which may impact upon any development that took place within the parcel. In this instance an additional point was also added.
- 4.5.5 Flood Zones were also awarded additional points. PPS25 categorises Flood Zones into four levels.
- Zone 1 – Little or no annual probability of flooding from rivers of <0.1%.
 - Zone 2 – Low to medium annual probability of flooding of 0.1-1.0% from rivers.
 - Zone 3a – High annual probability of flooding of 1% or greater from rivers.
 - Zone 3b – The Functional Flood Plain, annual probability of greater than 5% from rivers.
- 4.5.6 Flood Zones 2, 3a and 3b are those which would have an impact upon the future use of a parcel for development and therefore each level of Flood Zone resulted in additional points being awarded to a parcel. It is recognised however, that these Flood Zones represent varying degrees of constraint and therefore parcels that contained Flood Zone 2 were awarded 2 points, and parcels containing Flood Zones 3a or 3b were awarded 3 and 4 points respectively. In the instance where a parcel contained two Flood Zones, the higher level point was awarded as this would be more restrictive to development. PPS25 identifies that Flood Zone 1 is all the land falling outside Zones 2 and 3. Flood Zone 1 was therefore not a consideration for this study.
- 4.5.7 The scoring for the secondary constraints is similar to that of the primary constraints, but as they are considered less significant than a primary constraint, each constraint was awarded 1 point. Within the secondary constraints however, there are two tiers of constraints to recognise the difference between statutory designations (i.e. Local Nature Reserves (LNR's)) and local designations (i.e. Sites of Important Nature Conservation (SINC's)). Therefore SINC's and Regionally Important Geological Sites (RIGS) were only awarded 0.5 points per constraint.
- 4.5.8 Where multiples of the same secondary constraints were identified within an individual parcel, an additional 0.5 points were added per multiple. For example, if a parcel contained two LNR's, it would score 1 point for the constraint and an additional 0.5 point for the multiple constraint.

- 4.5.9 Additional points were also awarded where a parcel bordered a secondary constraint which may impact upon any development that took place within the parcel. In this instance an additional 0.5 points were also added.
- 4.5.10 In the instance that a parcel contains a statutory secondary constraint and a locally designated secondary constraint for example, a LNR and a SINC, the LNR would be awarded the point as this designation is more restrictive to development.
- 4.5.10 The scoring for existing developments and Permissions was based upon a tiered approach. As existing development or permissions within a parcel may result in the parcel, or an area of land within a parcel, being more acceptable or suitable for development, points were awarded. However, if a parcel contained no development or permissions, it was considered that this was a potential constraint and resulted in the parcel being less suitable for future development.
- 4.5.11 Parcels therefore that contained existing development (as defined at 4.4.5 above) and permissions were only awarded 1 point, whereas parcels that contained no development and no permissions were awarded 3 points. In the instance that a parcel contained either development or a permission, 2 points were awarded.
- 4.5.12 The landscape value assessment was undertaken on the basis of establishing the value that the landscape within each parcel contributed to the Green Belt. Therefore those parcels that were identified to provide higher value to the Green Belt were awarded 3 points.
- 4.5.13 Those parcels that were considered to provide medium value to the Green Belt were awarded 2 points, and those parcels where the landscape was identified as being of lower value to the Green Belt were awarded 1 point.
- 4.5.14 The connectivity element of the assessment was undertaken to eliminate those parcels that are not in some way connected to the urban forms in the study areas. As stated above at 4.4.17, three categories have been established to assess the criteria.
- 4.5.15 Those parcels that are directly connected to an urban area were not awarded any points as if it is connected, it does not constitute a constraint to development. Parcels connected to the urban area through an adjoining parcel which is directly connected to the urban area were awarded 1 point as it was considered that that not being directly connected may be a constraint but the connectivity through a parcel directly connected contributed to alleviating this constraint. Parcels that do not connect to an urban area either directly or indirectly were awarded 2 points as this is considered to be a constraint to future development.

- 4.5.16 Schedules 9 to 12 provide summaries of the further analysis of the parcels and are contained within Appendix 12, whilst Appendix 13 details the scoring matrices for the four study area.
- 4.5.17 The maximum score that the parcels within the Coventry study area could achieve was 33, whilst for Kenilworth, Nuneaton, Bedworth, Warwick and Leamington Spa study areas, the maximum score achievable was 32. The maximum for Coventry was higher due to the inclusion of Green Wedges within the analysis.
- 4.5.18 Having scored all the constraints to future development and identified final scores for each individual parcel, it is possible to identify those parcels which are less constrained in terms of their potential development.
- 4.5.19 For illustrative purposes only, those parcels that achieved 35% or less of their respective maximum score have been separately identified in this report as the least constrained parcels. The 35% requirement was determined by analysing the range of scores achieved and identifying an appropriate level which would potentially provide an adequate number of parcels that could potentially be studied in much greater detail in the first instance and could meet the RSS requirement.
- 4.5.20 However, this does not imply that only the least constrained parcels (35% or less) should be considered further or that those that scored above 35% should not be considered further. The four local authorities may wish to undertake more detailed analysis of the parcels through their individual Core Strategies, taking on board other issues such as localised criteria.
- 4.5.21 In relation to the Coventry study area the 35% achievement equated to scores of 11.5 and below and resulted in twenty eight parcels being identified.
- 4.5.22 In relation to Kenilworth, Nuneaton, Bedworth, Warwick and Leamington Spa study areas, the 35% equated to scores of 11 and below and resulted in fourteen parcels being identified; three parcels at Kenilworth, six parcels at Nuneaton and Bedworth, and five parcels at Warwick and Leamington Spa.

5.0 Report Findings

5.1 Overview

5.1.1 The purpose of this section is to outline the findings of the study and detail the parcels within the study area that have been identified as the least constrained and which the four Local Authorities can analyse further through their individual Core Strategies for the potential provision of future development.

5.2 Coventry

5.2.1 As detailed above in 4.5.21 within the Coventry study area, twenty seven parcels have been established as the least constrained and identified for more detailed analysis by the four Local Authorities. However, one parcel which has been identified, parcel C21b, scored low but is being discounted from further analysis and site identification. The study has not taken into account existing land uses as it is considered that this is a site specific issue that should be considered on a site by site basis by the individual Authorities through their Core Strategies. However, it is clearly indicated within the Coventry Development Plan that the parcel is the Coventry War Memorial Park. It is therefore not considered appropriate to progress with this parcel and it is recommended to be eliminated from future studies and analysis.

5.2.2 The twenty six parcels relating to Coventry that have been identified as the least constrained within the study area are visually represented in Figure 9.1 in Appendix 14. Figure 9.5 shows the Coventry parcels in relation to those identified within the remainder of the study area as well as within a regional context.

5.2.3 The original Project Brief requested that a hierarchy be provided as a result of the study, outlining the order that the identified parcels be brought forward for greater analysis and consideration by the four Authorities. However, upon reflection, the four Authorities have identified that a hierarchy would not be beneficial as it may restrict sites coming forward for development not only within the 35% and below parcels, but also within those sites that scored above 35%.

5.2.4 Table 5 below sets out those parcels relating to Coventry that scored 35% or below.

Table 5: Coventry Parcels 35% or Below

Parcel Reference	Score
C9b	5
C15b	5.5
C19d	6
C2d, C2g, C4b, C10a, C12c, C15a,	7.5
C1b	8
C4c, C12a, C12b, C14c, C19b, C20a	8.5
C19a, C19c	9.5
C2e, C2f, C4d, C12e, C20b	10.5
C2c, C8d, C13b	11.5

5.3 Nuneaton and Bedworth, Kenilworth and Warwick and Leamington Spa

5.3.1 As detailed above in 4.5.22 within the remainder of the study area, fourteen parcels have been established as the least constrained and identified for more detailed analysis by the four Local Authorities.

5.3.2 The fourteen parcels are visually represented in Figure2 9.2 to 9.4 in Appendix 14. Figure 9.5 also identifies the parcels in relation to those identified in relation to Coventry as well as within a regional context.

5.3.3 Table 6 below sets out those parcels relating to Nuneaton and Bedworth, Kenilworth and Warwick and Leamington Spa that scored 35% or below

Table 6: Ranked Kenilworth Parcels Based upon Scores

Parcel Reference	Score
WL6b	4
WL10	6
K3,	7.5
NB5a	8
NB1a, NB1b, , NB4c, K4, K5, WL5a, WL6a	8.5
NB4d, WL2	10.5
NB8a	11

5.4 Summary

5.4.1 Of the one hundred and seventeen parcels initially identified within the study areas, forty one have been identified as the least constrained in environmental and physical terms.

5.4.2 Having undergone the detailed analysis, there will be a range of other factors that will need to be considered at the local level, which may contribute to identifying sites within the above parcels for possible allocation within the respective Core Strategies.

5.4.3 In order to provide a finer grained, more detailed analysis of the parcels to identify specific sites for future development factors for consideration should include:

- Provisional Local Wildlife Sites;
- Ecological issues;
- Sustainability Issues;
- Infrastructure availability and constraints;
- Land availability;
- deliverability;
- Relationship with the Green Belt;
- Agricultural land Classification;
- Archaeological Constraints;
- Character & setting; and
- Historic Landscape Character Analysis.

6.0 Recommendations

6.1 Overview

6.1.1 The purpose of this section is to set out the recommendations in relation to the parcels that have been analysed within the study areas and in regard to other factors that should be taken into consideration in relation to the detailed analysis of the parcels to identify specific sites for development.

6.2 Recommendations

6.2.1 The purpose of this study was to identify parcels of land that the individual Local Authorities could examine in greater detail through their Core Strategies in order to identify sites to accommodate residential and employment development in line with the Regional Spatial Strategy for the West Midlands.

6.2.2 It is recommended that the parcels detailed within Tables 5 and 6, and represented within Figures 9.1 to 9.5 within Appendix 14, be investigated further in order to identify specific sites for future development.

6.2.3 It is further recommended that the four Authorities consider sites that may come forward within those parcels outside of the top 35%.

6.2.3 It is recommended that the issues identified at 5.4.3 above be taken into consideration by the four Authorities in relation to the finer grained analysis of all parcels.



Appendices

