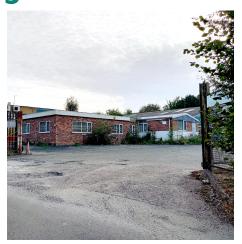
An introduction to the purposes of Green Belt, and choosing sustainable locations for growth.







# The Green Belt in South Warwickshire











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Cover photos show a range of land uses in Green Belt in South Warwickshire. Top row: A 20th Century housing estate in Bubbenhall; The canal at Kingswood; An industrial estate near Studley. Middle row: Fields near Wootton Wawen. Bottom row: Bubbenhall church; The M42 motorway; Tanworth in Arden.

#### **Green Belt: What it is**

First, we need to be clear what some of the key terms mean.

**Green Belts** are belts of land surrounding some of our largest cities, where new development is restricted. They were introduced in England during the middle and late 20th Century in response to the unplanned growth of large cities, sometimes referred to as 'sprawl'. The intention was that Green Belt land would be kept permanently open and free of development<sup>1</sup>.

This is different from **greenfield** land. Greenfield is a term used in planning to refer to any land which has not been previously built on. This includes open countryside, parks, and residential gardens.

In contrast, **brownfield** land is land which has previously been built on. Brownfield land is sometimes known as **previously developed land**.

Green Belts will typically contain a mixture of greenfield and brownfield land – a mixture of open countryside and existing development. Not all Green Belt is open countryside; and not all open countryside is Green Belt.

The government attaches great importance to Green Belts. National policy sets out **five purposes** of Green Belt<sup>2</sup>:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns 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.

When Councils draw up Local Plans, policies regarding development in the Green Belt must align with national policy. National policy on Green Belts can be found in Chapter 13 of the "National Planning Policy Framework" (NPPF), paragraphs 137 to 151:

www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land

<sup>&</sup>lt;sup>1</sup> NPPF paragraph 137

<sup>&</sup>lt;sup>2</sup> NPPF paragraph 138

#### Green Belt: What it isn't

Green Belt is not an environmental or landscape designation. Land in the Green Belt might well be valuable for wildlife, or have a particularly beautiful landscape; but equally, so might land that it outside of the Green Belt. Naturally we want to protect land which has these qualities, wherever it is located. These environmental considerations are not the reason that Green Belt was designated, and there are other methods for protecting land with these qualities, whether it is inside or outside of the Green Belt.

However, there is an environmental element to Green Belt. Because Green Belt surrounds large cities, this means that it is often well used for leisure activities. Councils are encouraged to plan for enhancing access to Green Belt land for sport and recreation, as well as enhancing landscapes and wildlife, and improving damaged or derelict land<sup>3</sup>.

In South Warwickshire, the Green Belt is often used for recreation. Top row: Allotments at Cubbington; Golf course near Stratford-upon-Avon. Bottom row: Bike trails at Newbold Comyn; Earlswood Lake.





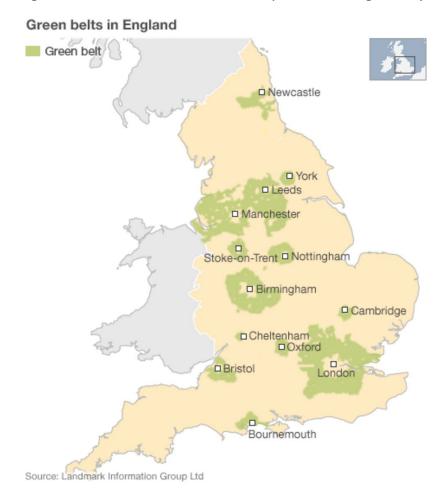




<sup>&</sup>lt;sup>3</sup> NPPF paragraph 145

## **Green Belts in England**

Figure 1 Green Belts in England. Source: Landmark Information Group Ltd via Planning Advisory Service



Not every city in England has a Green Belt. They tend to be used in certain types of location.

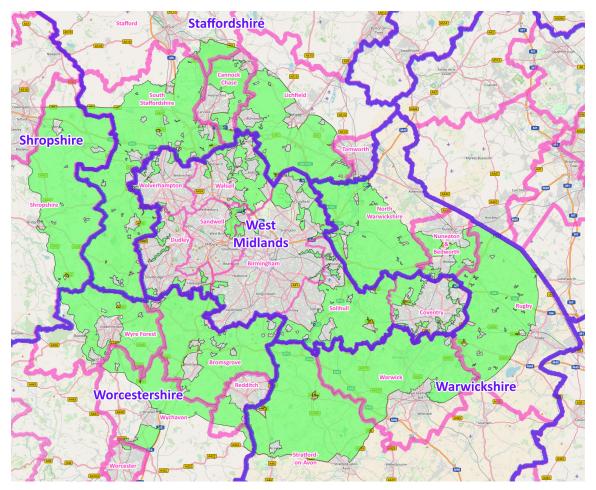
- London where one very large city had expanded significantly, engulfing neighbouring smaller towns
- Places where a network of cities and towns were growing and merging into one another. For example the North West Green Belt, which includes the large cities of Liverpool and Manchester, and numerous smaller settlements located in between.
- Smaller historic cities where excessive growth would impact on the character of the city. For example Cambridge.
- Places where two moderately sized towns or cities were particularly close together
  and so in greater danger of merging into each other. For example Gloucester and
  Cheltenham. In these cases, the Green Belt is often a smaller area of land in the gap
  between the settlements, rather than forming a belt on all sides.

Many of England's Green Belts contain aspects of more than one of these types.

## The West Midlands Green Belt

The West Midlands Green Belt surrounds the West Midlands conurbation (Birmingham, Solihull and the Black Country) and Coventry. Some large satellite towns are surrounded by Green Belt, including Redditch, Bromsgrove, Kidderminster and Bedworth. The Green Belt reaches the near edge of the towns of Leamington Spa, Warwick, Stratford-upon-Avon, Telford, Cannock, Lichfield, Tamworth, Nuneaton, Hinckley and Rugby.

Figure 2 The West Midlands Green Belt. Source: OpenMap and Department for Communities and Local Government via Wikipedia. District boundaries are shown in pink; county boundaries in blue<sup>4</sup>

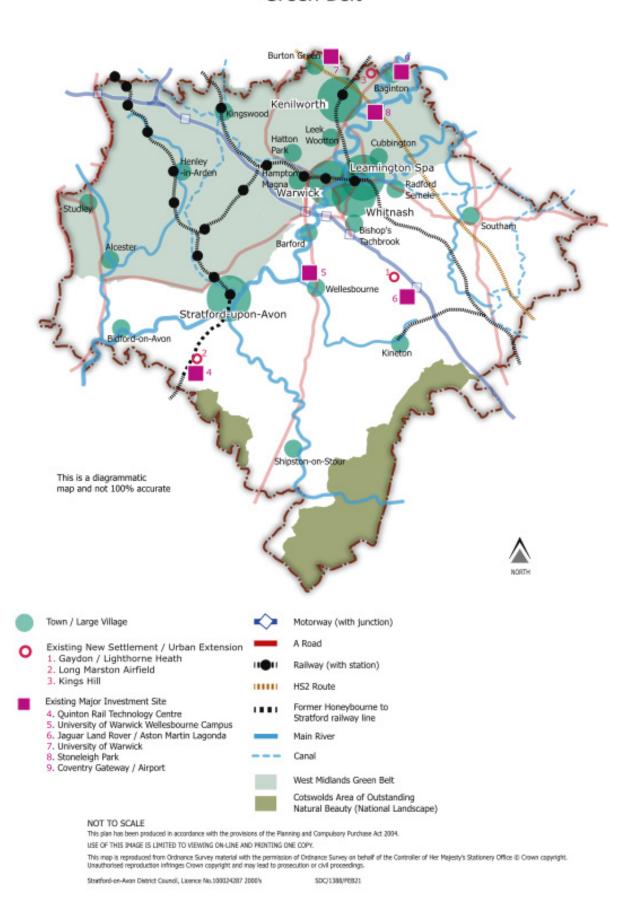


In South Warwickshire, the West Midlands Green Belt extends into the north western part of the districts, covering 34% of South Warwickshire's land area. This is 23% of Stratford-on-Avon District, and 71% of Warwick District.

The Green Belt reaches the northern edges of Leamington Spa, Warwick and Stratford-upon-Avon. At Kenilworth, Henley-in-Arden, Studley and Alcester, the Green Belt wraps around the settlement, but does not cover the built up area itself.

<sup>&</sup>lt;sup>4</sup> NB this map is inaccurate in the detail of Warwick District, as it doesn't show the insets for Kenilworth and other smaller settlements; or the changes south of Coventry at Kings Hill and Westwood Heath Road. However, the map is still considered helpful for indicating the broad extent of the West Midlands Green Belt.

#### Green Belt



## **Development in South Warwickshire**

The South Warwickshire Local Plan will determine a "growth strategy" up to 2050 – that is, a plan which determines where homes, jobs and other development are best located.

What about using brownfield land?

When looking for land that might be suitable for development, the South Warwickshire Local Plan will follow the national guidance<sup>5</sup> to make as much use as possible of **brownfield land**. Sites which are in well-connected places like our towns, and which have been developed before, will always be our first choice. This makes sense for many reasons:

- Close to existing facilities and jobs, so shorter journeys for the new residents or employees
- Close to public transport, so greater opportunity for sustainable travel
- Usually less impact on wildlife
- Usually less impact on landscape and natural beauty
- Less impact on agriculture.

We actively look for suitable brownfield sites that could be re-used, through an Urban Capacity Study<sup>6</sup>. However, this study found that there is not very much available in South Warwickshire, and certainly not enough for the number of homes and jobs we need to provide for. This means we also need to look at greenfield sites – sites which have not been developed before.

<sup>&</sup>lt;sup>5</sup> NPPF paraaraph 119

<sup>&</sup>lt;sup>6</sup> www.southwarwickshire.org.uk/doc/211522/name/Urban%20Capacity%20Study.pdf

## South Warwickshire has plenty of land which isn't in the Green Belt.

Why can't we use that?

When we are looking for greenfield sites to use, we want to be able to properly consider all options, so that we can make sure that we're choosing the most suitable and sustainable places. Whether a site is in Green Belt is one of the things that we need to think about, but it is not the only thing. We also need to balance a long list of other factors, which include things like:

- How close it is to facilities and public transport
- The impact on wildlife, landscape, natural beauty and agriculture
- Flooding
- Heritage

#### ...and many more!

If we had a "definitely no Green Belt" approach, this wouldn't reduce the amount of homes and jobs we need to provide for, but it would reduce our options about where they could go. There is a very real risk that we'd end up with homes and jobs having to go in places which aren't as suitable, or where the environmental consequences are worse. It would also mean that many villages outside of the Green Belt would have to grow out of proportion to their size and character.

Factoring all of this in, we think the most suitable places for future growth may include a mixture of Green Belt and non-Green Belt locations.

## Sustainability and the Green Belt

How can building on the Green Belt be best for the climate?

It sounds counter-intuitive, but in some cases, using some Green Belt land can be the best option, environmentally. It's all about location.

Planners work to promote "sustainable development" – this means development that meets the needs of the current generation, without compromising the ability of future generations to meet their own needs.

A key way to do this is to reduce people's need to travel, and to make sure that when they do travel, people have the option of going on foot, by bike, or by public transport. This is particularly important for regular journeys, for example those for work, education, shopping and leisure. This means having easy access to existing facilities, or ensuring that new facilities are provided as part of new development.

When we're all driving electric cars, will this still matter?

Electric cars are not a silver bullet for climate change. Switching to electric will help, but there are still a lot of emissions from their manufacture, and currently a large percentage of the electricity they run on is generated from fossil fuels. There are also health and community benefits associated with walkable neighbourhoods, where homes are not too spread out and people can easily reach the places they need to go.

#### Looking at South Warwickshire as a whole

In South Warwickshire, all of our train stations are in or close to the Green Belt. Many of our best-connected towns and large villages are in the Green Belt or next to it (see the map at Figure 3).

Since Covid, people don't need to commute as much

Hardly anyone uses the train

Not everyone commutes, but lots of people still do, and people still travel a lot for other reasons too. We are not trying to force people to travel in a certain way; we are trying to give people the option to use sustainable methods, and to make walking or cycling the easiest, safest and most appealing choice for short journeys.

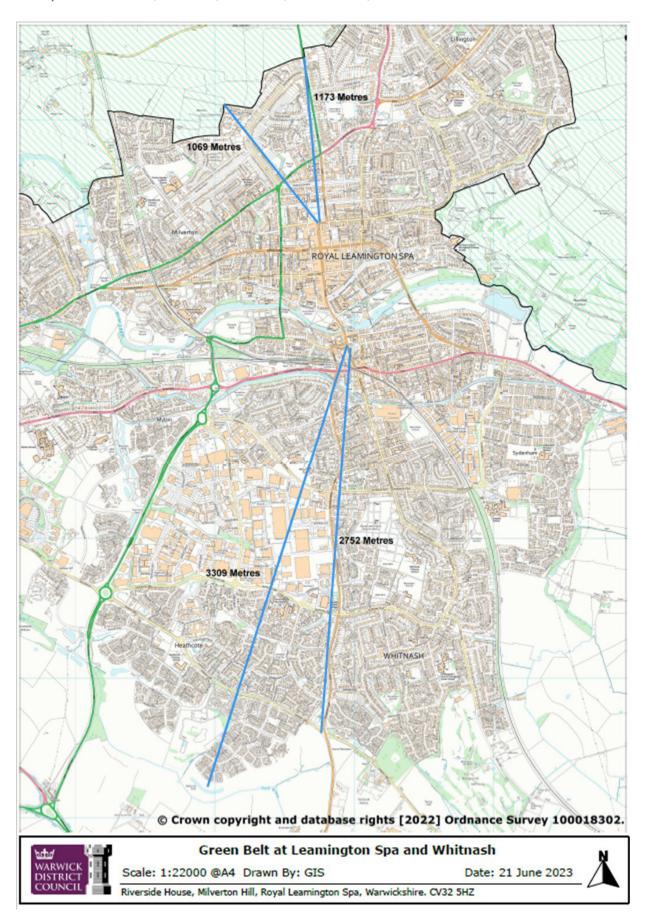


#### Looking at our larger towns

At Leamington Spa, Warwick and Stratford-upon-Avon, the Green Belt reaches the northern edge of the town, but does not wrap all the way around. This means that some recent development has been pushed to other directions, which can result in unbalanced growth.

For example, in Leamington Spa, to the north of the town centre, the closest area of open countryside is approximately 1km from the north end of the Parade – less than a mile. To the south of Whitnash, the closest area of open countryside is approximately 3km from the south end of the Parade (see Figure 4). People are much more likely to choose to walk or cycle a journey of 1km than one of 3km.

Figure 4 Green Belt at Leamington Spa and Whitnash. Blue lines show approximate distances from the town centre to open countryside to the north (Green Belt) and south (not Green Belt)



#### Looking at places surrounded by Green Belt

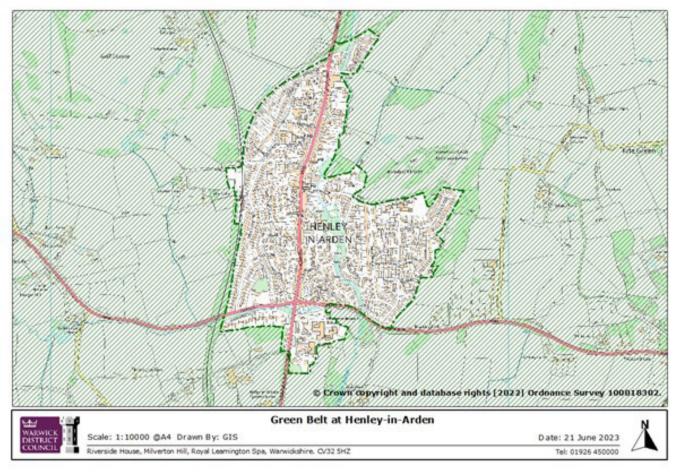
It is also important to consider the sustainability of a town or village as a whole. Normally you would expect small towns and large villages to grow and change naturally over time. Planned moderate growth is normally good for a number of reasons, including:

- A growing population helps keep the town centre vibrant particularly important since the rise of internet shopping;
- More children to keep rural schools viable;
- Development pays for new and enhanced facilities like GP surgeries and cycle paths;
- Providing affordable housing for those in need;
- Helps to keep house prices within reach of local people.

At Henley-in-Arden, Green Belt surrounds the town, but the built-up area is not in Green Belt.



Figure 5 Green Belt at Henley-in-Arden



As an example, Henley-in-Arden is surrounded on all sides by Green Belt. These boundaries were last amended in 2000. The positive consequence of the Green Belt around Henley is that it has encouraged the regeneration of urban brownfield land, for example the former cattle market on Warwick Road. However, the amount of available brownfield land in a settlement the size of Henley is limited, and the outer edges of the built up area have not changed significantly in many decades. This has artificially restricted the amount of development here. As a result, some of the benefits that development can bring, such as providing affordable housing, or upgrading local facilities, have perhaps been more limited.

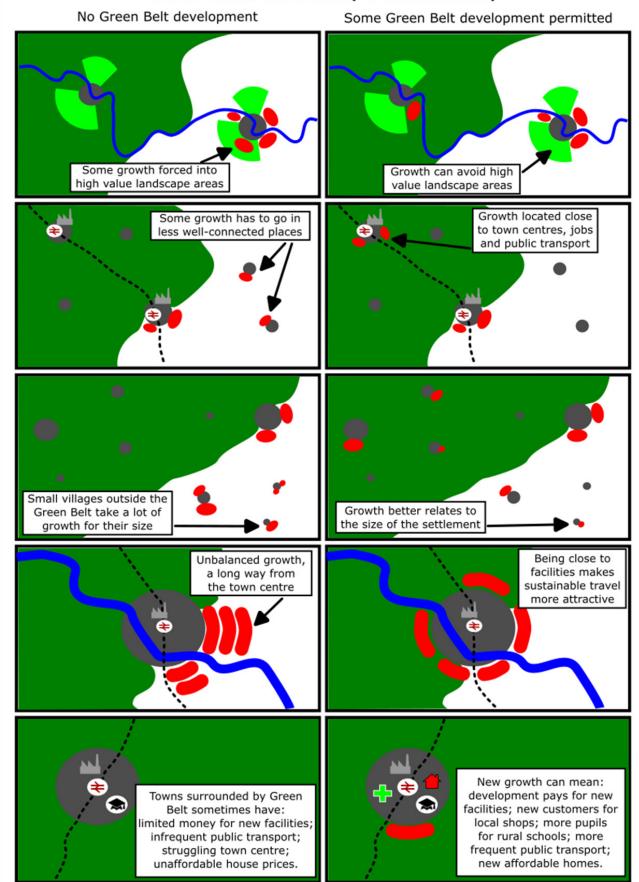
It is important to remember that these benefits can help the town as a whole – helping people who already live here, as well as the people who move into the new homes.

#### Sustainability summary

The main points made in the sections above are summarised in Figure 6. The left hand column shows the situation when no development is permitted in the Green Belt. The right hand column shows the alternative with some development permitted in the Green Belt.

Figure 6 Green Belt and Sustainability: a visual summary

#### Green Belt and sustainability: a visual summary



## **National policy**

If a Council wants to allocate Green Belt land for development, they would need to alter the boundaries so that the land is no longer in the Green Belt. National policy allows this to happen, when necessary, within Local Plans<sup>7</sup>. To be allowed to alter Green Belt boundaries, the Council have to demonstrate that there are "exceptional circumstances" which make this necessary<sup>8</sup>, and that they have explored all the other options<sup>9</sup>. If removing that land would allow for a sustainable pattern of development, then this can be used as an "exceptional circumstance"<sup>10</sup>.

Didn't the government say we don't have to build on the Green Belt?

A recent consultation on the National Planning Policy Framework (NPPF) indicated that the guidance is likely to change. The new wording is proposed to say that Councils don't have to build on Green Belt if that's the only way they can meet their housing targets<sup>11</sup>.

We don't think that this change will alter our approach in South Warwickshire. We could, in theory, place all our growth outside of the Green Belt if we wanted to. The issue isn't that we don't have space – it's that it may not be the most sustainable way to distribute growth. The proposed new NPPF still allows sustainability arguments to be used as an "exceptional circumstance" 12. This means that even with the proposed new wording, a Green Belt review is likely to be necessary in South Warwickshire.

<sup>&</sup>lt;sup>7</sup> NPPF paragraph 140

<sup>&</sup>lt;sup>8</sup> NPPF paragraph 140

<sup>&</sup>lt;sup>9</sup> NPPF paragraph 141

<sup>&</sup>lt;sup>10</sup> NPPF paragraph 142

<sup>&</sup>lt;sup>11</sup> Text proposed for insertion into paragraph 140 (renumbered 142): "Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period." <a href="https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy">www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy</a>

 $<sup>^{12}</sup>$  NPPF paragraph 142 (renumbered 144) is unchanged in the proposed new NPPF.

#### **A Green Belt Review**

A Green Belt Review is a piece of evidence which will help us make informed decisions. They are commonly undertaken as part of the evidence for drawing up Local Plans. For example, the Coventry and Warwickshire authorities conducted a joint Green Belt review, which informed the 2016 Stratford Core Strategy and the 2017 Warwick Local Plan<sup>13</sup>.

A Green Belt review looks at different pieces of land within the Green Belt, and assesses how well each piece of land performs against the **five purposes**. This is done using a clear and consistent methodology, to make sure that all areas are assessed fairly.

The Review itself will not make recommendations for what happens to the Green Belt boundaries. It doesn't pre-suppose that the boundaries will definitely change. Instead, it provides the information we need to make sure that any decisions are sensible and evidence-based.

That way, we can be sure that even if we need to change the boundaries in some places, the Green Belt as a whole will still continue to serve its purpose.

Do we really need a Green Belt Review?

If we don't carry out a Green Belt Review, then an Inspector may find our local plan to be "unsound". If we haven't properly considered all the options, then we couldn't be sure that we were directing development to the most sustainable locations. We would then be sent back to the drawing board.

<sup>&</sup>lt;sup>13</sup> Stage 1 Green Belt review (including Warwick): <a href="https://www.warwickdc.gov.uk/downloads/download/744/joint\_green\_belt\_study\_2015">www.warwickdc.gov.uk/downloads/downloads/download/744/joint\_green\_belt\_study\_2015</a>
Stage 2 Green Belt review (including Stratford): <a href="https://www.stratford.gov.uk/planning-building/green-belt.cfm">www.stratford.gov.uk/planning-building/green-belt.cfm</a>

## Strength of feeling

Local people don't want development in the Green Belt

Lots of people love the Green Belt – and rightly so. It does a valuable job in preventing the urban area of Birmingham and the Black Country, Solihull and Coventry from sprawling out into the countryside. Many people have told us how they use the Green Belt for leisure, and how they value its beauty and its wildlife.

Sometimes people are worried that we're just letting the developers do what they want, or even that we don't care what happens to the countryside.

We understand that suggesting a change to the Green Belt can be unsettling to our residents. The planners and the Councillors who are working on the South Warwickshire Local Plan are working to balance a lot of competing factors to find the best places for homes and jobs. We will always look for urban brownfield land first. We will always avoid harming land where the impact on the environment, wildlife and agriculture would be greatest – whether this land is in the Green Belt or outside of it. We will always look for the most sustainable places for growth, where the impact on climate change is the least.

As you might expect, finding the right balance is a challenge, but we are determined to find an outcome which works best for people, for nature, for the climate and for South Warwickshire.



