

Coventry and Warwickshire Green Belt Review 2015 / 2016: Critique of the methodology

For the South Warwickshire Local Plan

September 2023

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Green Belt reviews

Chapter 13 of the NPPF is concerned with Protecting Green Belt land. The opening paragraphs of this chapter¹ set the context in which all consideration of Green Belt land must be made:

137. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

138. Green Belt serves 5 purposes:

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

The NPPF allows for alterations of existing Green Belt boundaries when exceptional circumstances can be demonstrated², and when all other reasonable options have been fully explored³.

When defining or reviewing boundaries, Councils should:

- promote sustainable patterns of development;
- first consider brownfield land, and/or land which is well-served by public transport⁴;
- not include land which it is unnecessary to keep permanently open;
- if necessary, safeguard land for longer-term development needs beyond the plan period;
- demonstrate that the revised boundaries will last beyond the plan period;
- use recognisable and permanent physical boundaries⁵;
- exclude villages, unless their open character contributes to the openness of the Green Belt⁶.

The NPPF does not give further detail as to how a review should be conducted. Existing Green Belt reviews tend to vary in their methodology, with some common features. At the core of reviews is an assessment of how land parcels perform against the 5 purposes of Green Belt.

Variety has been found in a number of aspects of Green Belt reviews, including the scope of reviews; criteria against which land parcels are judged; definition of key terms; exclusion of some purposes depending on the nature of the study area; the size and nature of land parcels assessed; and single-stage or multi-stage reviews.

¹ NPPF paras 137 and 138

² NPPF para 140

³ NPPF para 141

⁴ NPPF para 142

⁵ NPPF para 143

⁶ NPPF para 144

The Coventry and Warwickshire Green Belt Review

The most recent Green Belt review that included the South Warwickshire authorities, was a joint review commissioned by the authorities in the Coventry and Warwickshire (C&W) subregion. This was conducted by independent consultants in two stages in 2015 and 2016, using a consistent methodology across all authorities. The first and second stage related to coverage of different authority areas, rather than iterative stages.

Stage 1 report (including Warwick District):

https://www.warwickdc.gov.uk/downloads/download/744/joint_green_belt_study_2015

Stage 2 report (including Stratford-on-Avon District):

<https://www.stratford.gov.uk/planning-building/green-belt.cfm>

Two of the C&W authorities – Stratford-on-Avon District Council and Warwick District Council – are currently working together to produce a South Warwickshire Local Plan. As part of the exploration of sustainable patterns of development, it is considered necessary to conduct a new Green Belt review. This document critiques the methodology used in the 2015/2016 C&W review, in order to determine whether it is appropriate to utilise this methodology for the new review.

The C&W methodology was subject to consultation prior to its implementation, amongst 22 local authorities with a relationship to C&W and / or the West Midlands. Four authorities provided comments. These comments were addressed by the consultants, and in some cases resulted in modification of the proposed methodology to address concerns. Comments and responses can be found here:

https://www.warwickdc.gov.uk/downloads/file/2930/appendix_3_-_method_consultation_jointgreenbeltreviewstudy_stage1finalreport_appendices_20-6pdf

The C&W review has been scrutinised at examination and forms part of the evidence base for a number of adopted Local Plans in the sub region. Indeed, the study was cited as a strength in a Planning Advisory Service “What Good Looks Like” critique of Warwick DC’s 2017 Local Plan⁷.

Nonetheless it is considered that there is value in a further critique of the methodology at this stage, for the following reasons:

- The response to the methodology consultation was poor, with only four authorities providing comments.
- The consultation took place before the methodology was implemented. Following its implementation, it is possible to view the outputs, as well as the methodology itself. This makes it easier to identify implications which may not have been apparent when considering the methodology in isolation.
- There may have been developments in best practice since 2015.

⁷ <https://www.local.gov.uk/sites/default/files/documents/What%20Good%20Looks%20Like%20-%20Warwick.pdf>

Other reviews used for comparison purposes

As part of this critique, a number of other Green Belt reviews are used for comparison. These are all reviews of parts of the West Midlands Green Belt. Two are from the perspective of the conurbation looking out (Birmingham and the Black Country) and two are from the perspective of near neighbours of the conurbation looking in (Bromsgrove and Lichfield). It is considered that the C&W subregion has elements of each perspective, with Coventry itself one of the “large built-up areas” whose sprawl is prevented by the West Midlands Green Belt; and the other authorities (including the South Warwickshire authorities) being near neighbours.

Birmingham – 2013. It was used in the development of the Birmingham Development Plan which was adopted in 2017.

https://www.birmingham.gov.uk/directory_record/468/planning_for_growth

Black Country – 2019, for the four Black Country authorities Dudley, Sandwell, Walsall and Wolverhampton. The Black Country plan got as far as a Regulation 18 Draft Plan for consultation, but work then ceased. The Green Belt review has therefore not been subject to examination.

<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4i/>

Bromsgrove – 2019. This is forming part of the evidence base for the Bromsgrove District Plan Review, the next stage of which will be “Preferred Options”. The Green Belt review has therefore not been subject to examination.

<https://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies-and-other-planning-information/bromsgrove-district-plan-review/evidence-base/green-belt-purposes-assessment.aspx>

Lichfield – 2019 and 2021. These reviews form part of the evidence base for a local plan which was submitted for examination in June 2022. Since then, a new Council administration has sought to withdraw the plan from examination, in order to investigate the possibility of a new settlement to reduce the impact of growth on existing communities.

<https://www.lichfielddc.gov.uk/downloads/download/142/green-belt-review>

Independence

C&W approach

The C&W review was carried out by external consultants.

Comparison to other reviews

The Birmingham and Black Country reviews both used consultants. The Bromsgrove review was carried out in-house by Council officers. At Lichfield, the Stage 1 review was carried out in-house with consultants acting as a 'critical friend'; Stage 2 was carried out by consultants.

Critique

There are a number of benefits to using consultants, and perhaps the most important amongst these is the independence, and perceived independence, of the review. Any consideration of Green Belt boundaries has the potential to be contentious, and the establishment of independent professional evidence is an important step in reassuring the general public that decisions are taken based on robust and unbiased information.

A further key benefit is that consultants can be selected who have extensive experience in running reviews for local authorities. This experience can be crucial in establishing a robust methodology.

Reviews are also significant pieces of work, and planning policy teams may not always have the capacity to devote adequate time to conducting a review. Where many authorities are working together on a review, using consultants also helps avoid inconsistencies of approach when applying judgement in scoring land parcels.

The main benefit of conducting a review in-house is that officers would typically have greater local knowledge than external consultants, which would help at key stages such as defining land parcels. However, this knowledge can still be utilised with appropriate checking of the work of consultants.

It might also be expected that an in-house review could be conducted for a lesser cost, because there would be no profit margin added to the labour costs.

Suggested approach for South Warwickshire

To use external consultants.

Scope of the review

C&W approach

The C&W review assessed the performance of land parcels against the 5 purposes of Green Belt. The review did not consider whether settlements "washed over" by Green Belt were suitable for exclusion. No recommendations were made regarding removing land from the Green Belt. No consideration was made of designating new areas of Green Belt.

Comparison to other reviews

All the compared reviews assess the 5 purposes. In addition, three of the four also assessed other elements. In Birmingham, wider site assessments were made, looking at aspects such as landscape sensitivity and ecological constraints. In the Black Country, wider site constraints were overlaid to determine which parcels should be considered in a stage 2 assessment. Stage 2 then considered the potential harm if a parcel was removed from the Green Belt, including various different scenarios. At Lichfield, the stage 2 study assessed the potential harm to the Green Belt if sites were released. Separate assessments were also undertaken of villages "washed over" by the Green Belt to assess

whether any of these were suitable for exclusion from the Green Belt; and to consider the suitability of a potential new area of Green Belt, related to a strategic development allocation.

Birmingham's review was the only one to make recommendations for the release of particular parcels from the Green Belt. All the others are presented as part of the evidence base to inform decision making.

Critique

Assessment of the 5 purposes is a core requirement of a Green Belt review. It is considered that there is further benefit to also assessing the harm on the wider Green Belt if a parcel (or combination of parcels) is released. This differs from the assessment of the 5 purposes in that it takes a step back from the individual parcel and considers the wider picture. The release of a particular land parcel could impact the strength of adjacent Green Belt land, for example by leaving isolated parcels or narrow strips of Green Belt, reducing gaps between settlements, or diminishing the extent to which adjacent Green Belt could be considered countryside.

A benefit of combining a Green Belt review with wider site and landscape assessments is that it can give a rounded picture of the impacts of development in a particular location, and can avoid the perception that a particular constraint has been missed or deemed unimportant, simply because it is not referred to in a particular study. A counter view is that keeping different elements separate can help to avoid common misconceptions about the purposes of Green Belt. For example, Green Belt is commonly misunderstood to be a reflection of the beauty or environmental richness of a particular area of countryside. If a landscape sensitivity study is presented as part of a Green Belt review, this could reinforce this misconception.

The different approaches seen here tend to reflect the type of study area. Somewhere like Birmingham, where most or all of the potential development land is in the Green Belt, it makes sense to combine the various elements into a single study. In areas with a mixture of Green Belt and non-Green Belt land, other assessments will need to cover a much wider geographical area than a Green Belt review, so it makes sense to keep them separate.

The inclusion of recommendations regarding release of particular pieces of land is considered to undermine the perceived independence of a Green Belt review. Many reviews acknowledge that there may be good planning reasons for releasing land which performs well against the 5 purposes (for example land which is sustainably located close to public transport or other local facilities). The outcomes of a Green Belt review are one of many pieces of evidence to be considered, when deciding the most appropriate locations for growth.

Suggested approach for South Warwickshire

To assess the 5 purposes of Green Belt, and the potential harm if particular land parcels (or combinations of land parcels) are released.

To assess villages currently "washed over" by Green Belt to determine whether any of these are suitable for exclusion (this is considered in greater depth later in this report).

Not to include recommendations regarding release of particular pieces of land.

To consider whether patterns of proposed development may justify the designation of new Green Belt land.

Definition of land parcels

C&W approach

Land adjacent to towns and main rural villages was parcelled. Maps and aerial images were used to identify areas of the same or very similar land use or character, and with boundaries consisting of physical features that were considered to be readily recognisable and likely to be permanent and, therefore, potentially suitable for delineating Green Belt boundaries. The remaining areas of Green Belt – the largely open and undeveloped countryside between the large built-up areas and main rural villages – were then defined as ‘broad areas’.

Comparison to other reviews

Definition of land parcels is typically carried out using clear features such as roads and railways, aiming to include land of a broadly similar character within a parcel. The size and location of these parcels varied according to the nature of the study and study area. For example in Birmingham, parcels were defined which were large enough to potentially accommodate a sustainable urban extension including a range of community and other supporting infrastructure. In the Black Country where boundaries are often drawn close to the edge of the built up area, all Green Belt land was parcelled. In Bromsgrove, the Stage 1 study parcelled all Green Belt into moderately large parcels, with the intention that this will be followed by a Stage 2 study looking at smaller parcels at potential development sites. Lichfield used smaller parcels adjacent to existing settlements and ‘broad areas’ elsewhere, similar to the approach in the C&W study.

Critique

The C&W approach is considered sound. Focussing parcels around existing settlements reflects the areas most likely to be considered for development, and thus provides a detailed analysis in places where it is required. There is no benefit in such small-scale analysis in swathes of open countryside not being actively considered for development, so the use of ‘broad areas’ is appropriate. The definition of land parcels using permanent physical features is also considered appropriate – noting of course that this does not tie any future release to using these exact features or parcel boundaries. The methodology also does not preclude a future review redrawing parcels to reflect recent changes, or defining new parcels to study in more detail areas of potential development.

Suggested approach for South Warwickshire

To use the existing land parcels and broad areas as the basis, adjusting these only where necessary. To utilise the C&W criteria for defining new or adjusted parcels.

Reasons for new or adjusted parcel boundaries may include:

- Where Green Belt boundaries have altered since the C&W review took place
- Where recent or proposed development suggests different parcel boundaries
- To properly consider potential new development locations that were not parcelled in the C&W review (for example, around settlements not previously parcelled, or at potential new settlement locations)
- Washed-over villages where these are to be considered for inseting.

Washed-over villages

For some settlements within the wider Green Belt area, the Green Belt designation ends at the edge of the settlement, so that the built up area is excluded from the designation. These settlements are often referred to as being “inset” into the Green belt. For such settlements, Green Belt policy does not apply within the inset area.

For some settlements, the Green Belt designation includes the built-up area of the settlement. These settlements are often referred to as being “washed-over” by the Green Belt. For these settlements, Green Belt policy applies within the built-up area.

The NPPF indicates which villages should be excluded from the Green Belt⁸:

“If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

C&W approach

The C&W review did not include an assessment of villages washed-over by Green Belt.

Comparison to other reviews

Lichfield District Council’s review included a Green Belt Village Study. The 2019 study included a written description of the character of eight washed-over villages, and found that three of these had a character which was compact rather than open. These three villages were suggested for further detailed analysis.

The 2021 study included this more detailed assessment of the following:

- Does the village have an open character?
 - General pattern of development and density; and
 - Scale and form (dwelling type, building height, extent of gaps / open spaces).
- Does this make an important contribution to the openness of the Green Belt?
 - Definition of the village in terms of how clearly defined the boundary is;
 - Built form, topography and vegetation (focused on how these enable or obstruct views); and
 - Whether open areas within the village appear continuous with the surrounding Green Belt.

The review then made recommendations whether the assessed villages should be inset, or should remain washed-over. All three were recommended to remain washed-over.

Critique

Both the South Warwickshire authorities currently have some settlements inset into the Green Belt and some which are washed-over by Green Belt. The selection of which settlements to inset appears to relate to the categorisation of settlement types in each plan, rather than through an assessment of the openness of their character. Due to differences in how settlements were categorised in each

⁸ NPPF para 144

authority, there is currently some inconsistency across South Warwickshire. In general, smaller places tend to have been inset in Warwick District than in Stratford District.

Current status of settlements in Stratford-on-Avon District:

Inset or washed over – Stratford-on-Avon	Settlement categorisation	Settlements
Inset	Main Rural Centre	Alcester Henley-in-Arden Studley
Washed-over	Category 1 Local Service Village	None in the Green Belt area
Washed-over	Category 2 Local Service Village	Wilmcote Wootton Wawen
Washed-over	Category 3 Local Service Village	Claverdon Earlswood Great Alne Snitterfield
Washed-over	Category 4 Local Service Village	Aston Cantlow Bearley Mappleborough Green Tanworth in Arden Wood End
Washed-over	“All other settlements” of a size such that an assessment may be justified	Aspley Heath Haselor King’s Coughton Langley Norton Lindsey (village straddles SDC/WDC border) Oversley Green Peston Bagot Sambourne Ullenhall Wolverton

Current status of settlements in Warwick District:

Inset or washed over – Warwick	Settlement categorisation	Settlements
Inset	Urban areas	Kenilworth
Inset	Growth villages	Baginton Burton Green Cubbington Hampton Magna Hatton Park Kingswood Leek Wootton
Washed-over	Limited infill villages	Ashow Baddesley Clinton Beausale Bubbenhall Chessetts Wood Eathorpe Hampton-on-the-Hill Haseley Knob Hatton Green Hatton Station Hill Wootton Lapworth Little Shrewley Lowsonford Norton Lindsey (village straddles SDC/WDC border) Offchurch Old Milverton Rowington Rowington Green Shrewley Common Stoneleigh Weston-under-Wetherley

The villages categories were arrived at with reference to factors including the range of local services and facilities available, and travel connections to larger urban areas. It cannot be assumed that the openness of a village's character is necessarily related to this kind of factor. Consequently it is not considered appropriate to use village categories as a proxy to determine which settlements should be excluded from the Green Belt.

There is also a difference between the two authorities regarding Built Up Area Boundaries. In Warwick District, the 2017 Local Plan established these for all the settlements listed in the table above. In Stratford District, the 2016 Core Strategy established these for the Main Rural Centres, but not the Local Service Villages. Some adopted Neighbourhood Development Plans have superseded these boundaries, while others have established new boundaries for smaller villages. The emerging Site Allocations Plan includes proposed boundaries for the remaining Green Belt Local Service Villages, but it should be noted that at this stage these have not been adopted.

The SWLP Issues and Options consultation included a question regarding whether the number and extent of existing boundaries (including SAP boundaries) should be addressed in the Part 1 plan, or “saved” in the Part 1 plan and addressed in the Part 2 plan. Responses were sharply polarised, with individual respondents in favour of saving the existing boundaries, while landowners and developers were strongly in favour of addressing boundaries in Part 1. No decision has yet been taken.

Suggested approach for South Warwickshire

To ensure alignment with the NPPF, the following steps are recommended:

- For settlements currently washed-over by Green Belt, an assessment of the openness of their character, to determine whether they should be excluded from the Green Belt. For reasons of proportionality and efficient use of resources, it may be appropriate to establish a threshold population size above which settlements are assessed.
- For settlements suggested for exclusion, an assessment whether there is a need to establish or adjust Conservation Areas or other suitable methods to ensure the protection of the village’s character.
- For settlements currently inset – a sense-check that the established boundaries remain up to date

It is also suggested that a separate, parallel piece of work is carried out to establish consistent settlement categorisation across both districts, and an associated review and/or establishment of settlement boundaries.

Designation of new Green Belt land

In some situations, it may be appropriate to designate further land as Green Belt. The NPPF indicates the circumstances in which this may be considered⁹:

“The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:

- (a) demonstrate why normal planning and development management policies would not be adequate;*
- (b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- (c) show what the consequences of the proposal would be for sustainable development;*
- (d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and*
- (e) show how the Green Belt would meet the other objectives of the Framework.”*

C&W approach

The C&W review did not consider the designation of any new Green Belt land.

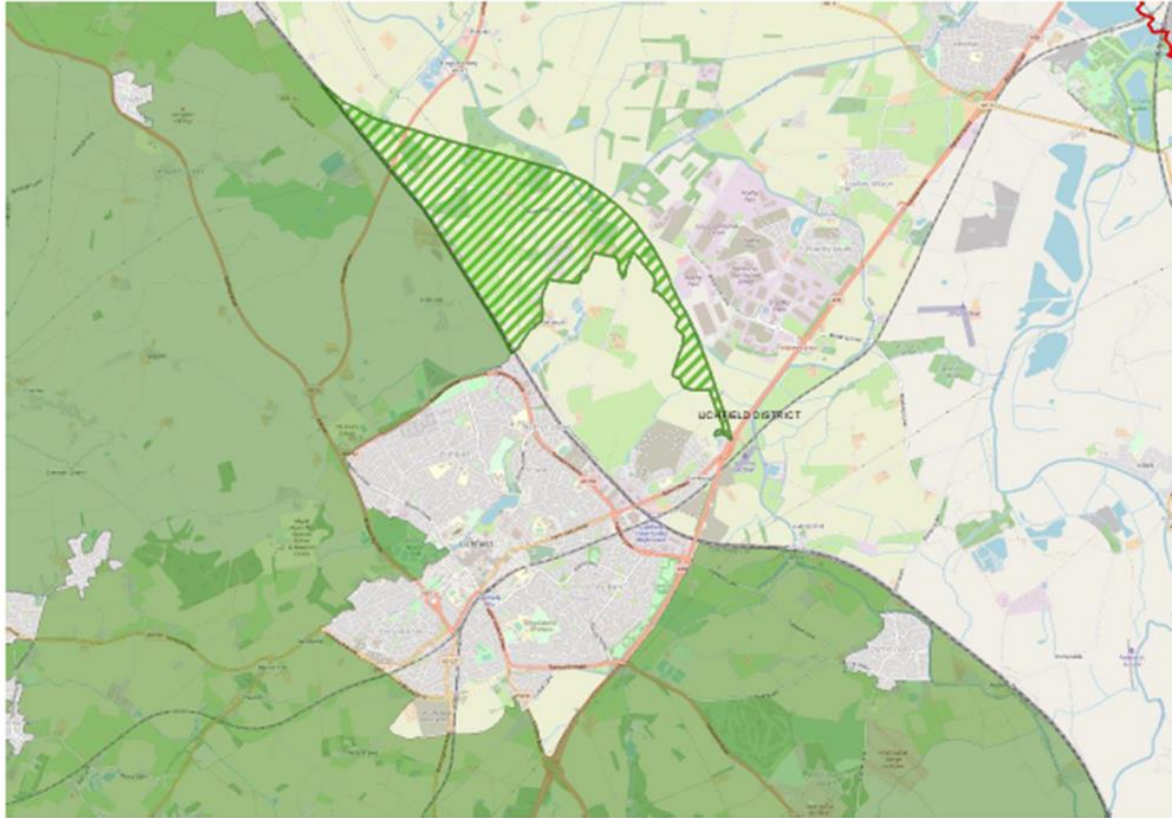
Comparison to other reviews

Lichfield District Council’s review included the consideration of a new area of Green Belt. Lichfield City is located on the edge of the Green Belt. To the North East, a significant urban extension was planned in non-Green Belt land, which would bring the city close to the smaller settlement of

⁹ NPPF para 139

Fradley. A new area of Green Belt was considered between Lichfield and Fradley to prevent their coalescence. The HS2 line was the proposed new outer boundary.

Figure 1. Proposed area of potential new Green Belt as shown on the Preferred Options policy map (area shown by the green stripes)



Ultimately the proposed extension to the Green Belt was not found to be justified. This conclusion was drawn because it was not possible to demonstrate that normal development management policies were inadequate. Further, the narrow width of the proposed new Green Belt meant that it was considered to have limited benefit in preventing coalescence, beyond what is already achieved in this regard by the HS2 line and its earthworks.

Critique

It is considered that the NPPF sets a high bar for designating new Green Belt. New designations must be justified in their own right, and consequently it would not be appropriate to attempt to designate new Green Belt simply to compensate for the loss of Green Belt elsewhere.

Aside from minor revisions to boundaries, it is likely that any new Green Belt could only be justified if significant new planned growth were to cause a substantial change to the existing situation, in areas close to the existing Green Belt boundary. For example if the position of a proposed new settlement or urban extension heightened the risk of two settlements merging.

It should be noted that there is precedent locally for using other mechanisms to achieve aims similar to Green Belt designations. Radford Semele is a village in Warwick District, located a short distance to the East of Leamington Spa. The Green Belt boundary stops just North of the village, along the River Leam (just visible on the Northern edge of the map below). This means that the gap between Radford Semele and Leamington is not protected by Green Belt, leaving a potential risk of

coalescence. To address this, Radford Semele's made Neighbourhood Development Plan includes the following policy:

"Policy RS12 – Area of Separation

To ensure that Radford Semele village remains a distinct, separate settlement and to prevent coalescence with Royal Leamington Spa, Sydenham and Whitnash the Area of Separation identified in Policies Map 8 will be maintained. This area lies to the west of Radford Semele and extends up to the Parish boundary. Any developments that would result in a significant reduction in the area of separation, or distance between settlements, or harm the landscape and openness of the environment within the area of separation, such that it threatens the village's physical separate and distinct identity will not be supported. Erosion of the area by multiple small developments will also not be supported."

Policy Map 8. Area of Separation



Suggested approach for South Warwickshire

To consider whether proposed locations for growth result in a potential justification for designation of new Green Belt land. If so, to identify and assess parcels for potential designation.

This would necessarily be a separate step to the rest of the Green Belt review, as it cannot take place until proposed locations for growth are known; and these proposed locations for growth will themselves be informed by the Green Belt review.

Purpose (a): to check the unrestricted sprawl of large built-up areas

C&W approach

The scoring criteria assessed the level to which a land parcel had existing development and a sense of openness. Parcels with less development, particularly if they did not have ribbon development, scored more highly (with a maximum score of 4). Less developed parcels were considered to have a stronger role in preventing sprawl. “Large built-up areas” was not defined. The detailed scoring criteria can be seen in the table below.

Criteria	Score / Value	Assessment method notes
Does the parcel play a role in preventing ribbon development and/or has the Green Belt within the parcel already been compromised by ribbon development?	If strong role (parcel inhibiting development along two or more sides of a road corridor), 2 If some role (parcel inhibiting development along one side of a road corridor), 1 If no role (parcel not inhibiting development along a road corridor), 0	Ribbon development is linear development along any route ways where direct access from a development to the road would be possible. Sprawl is the spread of urban areas into the neighbouring countryside, i.e. the outward expansion of settlements into the neighbouring countryside.
Is the parcel free from development? Does the parcel have a sense of openness?	If land parcel contains no development and has a strong sense of openness, 2 If land parcel contains limited development and has a relatively strong sense of openness, 1 If land parcel already contains development compromising the sense of openness, 0	Development means any built structure.

Comparison to other reviews

The Birmingham study assessed the parcel’s role in preventing sprawl and ribbon development, and whether existing development affects openness. In Birmingham it is implicit that the “large built-up area” is the West Midlands conurbation – the city’s boundaries are tightly drawn and there are no other significantly sized settlements which are not contiguous with the conurbation.

In the Black Country, assessment of this purposes considered the existing urban development in a parcel, and whether the land was sufficiently separated or distant from a large built-up area for there to be no significant potential for sprawl from the large built-up area. The “large built-up area” was defined as being the West Midlands conurbation, and in addition, certain named smaller settlements which were close enough related to the main area to be considered part of it; and also a

cluster of small settlements in the Cannock area which taken together were considered large enough to constitute a separate large built-up area.

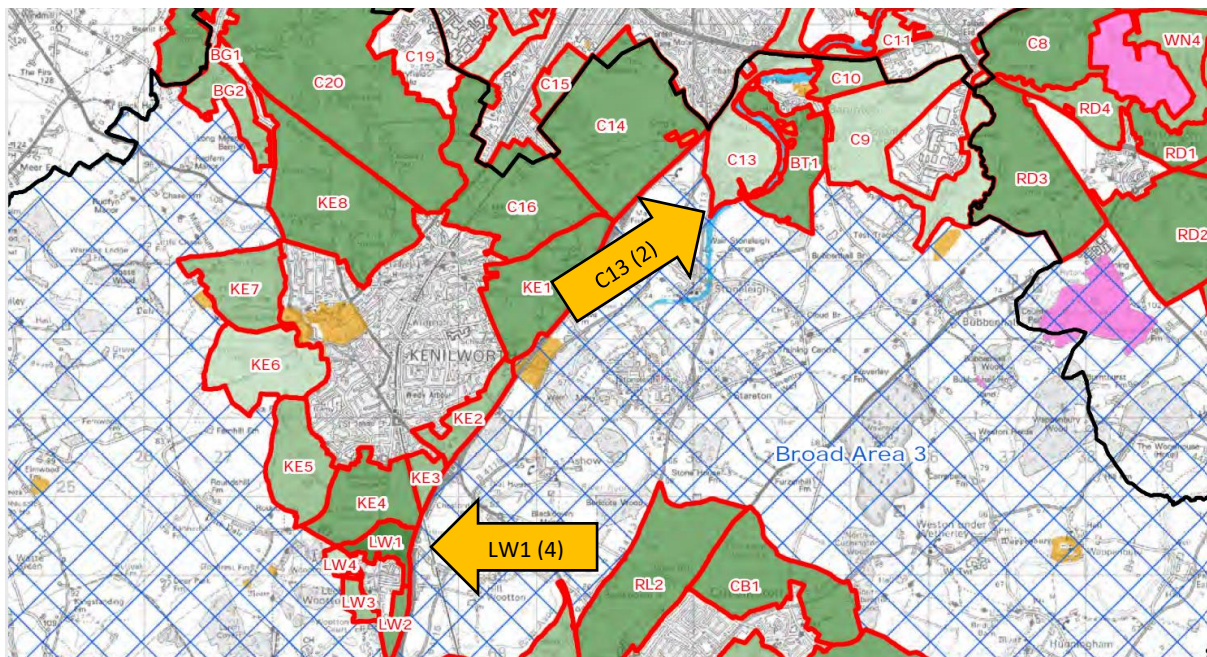
The Bromsgrove study considered whether a land parcel was adjacent to a large built-up area, whether it contained ribbon development and other urban features, and defensible boundaries. “Large built-up areas” were defined as parts of the West Midlands conurbation, Bromsgrove town and Redditch.

In Lichfield, the study considered proximity to a large built-up area, the potential for long-term boundaries to be established, existing development and sense of openness. “Large built-up areas” were defined as the West Midlands conurbation (including places physically separated but functionally part of the conurbation), Rugeley, Tamworth, Lichfield City and Burntwood. The inclusion of Lichfield and Burntwood was in recognition of the potential of sprawl from these into the Green Belt, as well as sprawl from the conurbation.

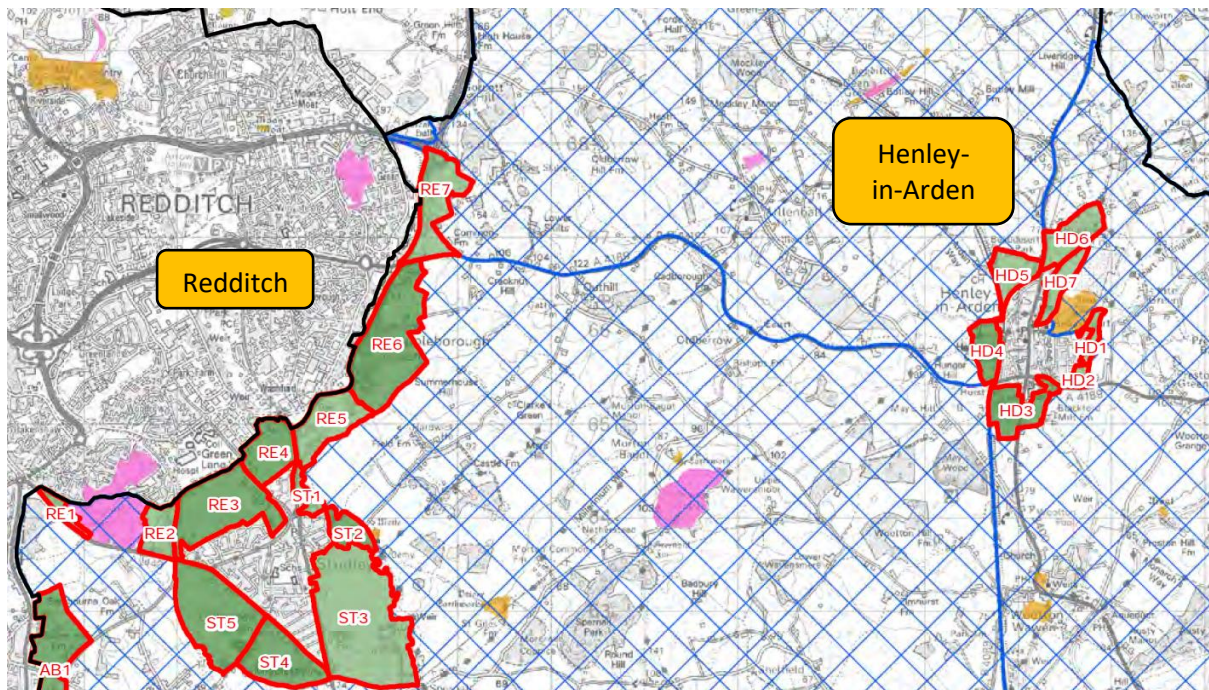
Critique

Insofar as it goes, the C&W method for determining whether a land parcel plays a role in containing sprawl is considered sound. Ribbon development is given prominence, because this kind of unplanned expansion along existing roads is widely recognised to be a common pattern seen when urban areas experience sprawl. A shortcoming of the methodology, however, is that “large built-up area” has not been defined, and thus a land parcel’s proximity to a large built-up area does not factor into the scoring criteria. The criteria have been applied to settlements of any size, many of which could not be considered large. The consequences of this are that land parcels on the edge of small villages have the potential to score as highly as parcels on the edge of Coventry.

For example: Parcel LW1 on the northern edge of the village of Leek Wootton has the highest possible score of 4, while parcel C13 on the southern edge of the city of Coventry scores 1.



Parcels surrounding Henley-in-Arden are scored on a par with parcels on the edge of Redditch.



The West Midlands Green Belt was established to check the unrestricted sprawl of the West Midlands conurbation (Birmingham, the Black Country, Solihull) and Coventry. It is considered that the C&W methodology results in an over-application of purpose (a), leading to an excessively conservative grading of land parcels around smaller settlements.

An alternative view could be put forward. The Green Belt has a depth of a few miles in each direction from the West Midland conurbation, in recognition that sprawl from a major city does not necessarily happen immediately adjacent to that city. It could therefore be argued that any settlement within the Green Belt is equally prone to sprawl arising from the housing needs of the main city. If this argument is accepted, then a land parcel's proximity to the main city need not factor into the scoring criteria.

A logical middle ground is to consider whether other Green Belt settlements should be considered "large built-up areas" in their own right, and / or a functional part of the main conurbation, based on factors such as their size, position, and connection to the main urban area.

Suggested approach for South Warwickshire

To define which settlements in or adjacent to South Warwickshire are “large built-up areas”. An initial suggestion is presented in the table below:

Type of settlement included	Settlement included	Notes
Parts of the West Midlands conurbation / Coventry adjacent to South Warwickshire	Coventry	
Settlements closely related to Coventry	Baginton Burton Green Kenilworth	Baginton and Burton Green are both connected to Coventry by existing development. Kenilworth is suggested for inclusion based on proximity, and its road, rail and bus links to Coventry.
Large settlements set into the Green Belt	Redditch	Redditch has a population of around 87,000 (2021 Census) and is wholly surrounded by Green Belt. It is therefore reasonable to assume that purpose (a) applies.
Settlements closely related to Redditch	Astwood Bank Mappleborough Green Studley	These settlements each have very close proximity to Redditch.

The rationale for excluding certain settlements from the definition of “large built-up area” is given in the table below:

Type of settlement excluded	Settlement excluded	Notes
Towns on the edge of the Green Belt	Leamington Spa Stratford-upon-Avon Warwick	While these towns are each of a fair size in their own right, they sit on the edge of the Green Belt rather than within it. It is inferred from this that the Green Belt was not intended to prevent their growth, and thus it does not seem appropriate to consider them as part of the “large built-up area” restricted by purpose (a).
Other market towns and villages set into the Green Belt, which had been “parcelled” in the C&W review	Alcester Cublington Hampton Magna Hatton Park Henley-in-Arden Kingswood Leek Wootton	Each of these settlements is considered to be too small to constitute a “large built-up area”, and not closely enough related to either Coventry or Redditch to be considered functionally part of either of those settlements.

After the definition of “large built-up area” is established, the scoring methodology should then be adjusted to reflect this. There are two options here:

Option 1: Apply the existing C&W criteria only to those land parcels which are adjacent to a large built-up area. These parcels could then score between 0 and 4 depending on their level of existing development. Parcels not adjacent to a large built-up area would all score 0.

Option 2: Adjust the C&W criteria so that a parcel's adjacency to a large built-up area is one of the scoring criteria. This would form 50% of the available score, with the remaining 50% coming from the existing development criteria, simplified into a single criterion. Parcels adjacent to a large built-up area could score between 2 and 4 depending on their level of existing development. Parcels not adjacent to a large built-up area could score between 0 and 2.

Option 2 is considered preferable, as it makes some allowance for sprawl occurring distant from the main urban area, but with additional prominence to the role of proximity.

A suggested scoring criteria for option 2 is presented in the table below:

Criteria	Score / Value	Assessment method notes
Is the parcel adjacent to a settlement defined as part of a "large built-up area"	If parcel is adjacent to a defined settlement, 2 If parcel is not adjacent, 0	The defined settlements are: Astwood Bank Baginton Burton Green Coventry Kenilworth Mappleborough Green Redditch Studley
Does the parcel play a role in preventing ribbon development and/or has the Green Belt within the parcel already been compromised by ribbon development?	If land parcel contains no ribbon or other development, and has a strong sense of openness, 2	Ribbon development is linear development along any route ways where direct access from a development to the road would be possible.
Is the parcel free from other development?	If land parcel contains ribbon development along one side of a road corridor, and / or contains limited other development and has a relatively strong sense of openness, 1	Sprawl is the spread of urban areas into the neighbouring countryside, i.e. the outward expansion of settlements into the neighbouring countryside.
Does the parcel have a sense of openness?	If land parcel contains ribbon development on both sides of a road, and / or contains other development compromising the sense of openness, 0	Development means any built structure.

Purpose (b): to prevent neighbouring towns merging into one another

C&W approach

The C&W review used an approach based solely on the physical distance between neighbouring settlements. “Towns” was not defined, and the criteria were applied to settlements of all sizes.

Criteria	Score / Value	Assessment method notes
Is the parcel located within an existing settlement?	If the parcel is within an existing settlement or more than 5 km away from a neighbouring settlement, 0	Merging is the joining or blurring of boundaries between two settlements.
If no, what is the width of the gap between the settlements at the point that the parcel is intersected?	If <1 km away from a neighbouring settlement, 4	A straight line is measured at the narrowest point between settlements. The line must pass through the parcel being assessed.
	If between 1 km and 5 km away from a neighbouring settlement, 2	

Comparison to other reviews

The Birmingham study assessed the width of the gap between urban areas. The study provided distances to “large” and “small” settlements, with Atherstone (population around 9,000 in 2021) being the smallest of the “large” settlements referred to.

In the Black Country, assessment considered whether land was in a gap between towns, the width of that gap, and the influence of other separating features between towns. “Towns” were defined as those recognised as “strategic centres” or “town centres” in the 2011 Black Country Core Strategy settlement hierarchy, and other towns in neighbouring authorities.

In Bromsgrove, the assessment considered gaps between settlements, and whether the loss of openness of land in this area would cause a significant visual or physical sense of merging. “Towns” were defined as all settlements currently excluded from Green Belt in the District, as well as similar sized settlements outside the district. The list of “towns” includes settlements that would in other contexts be considered villages.

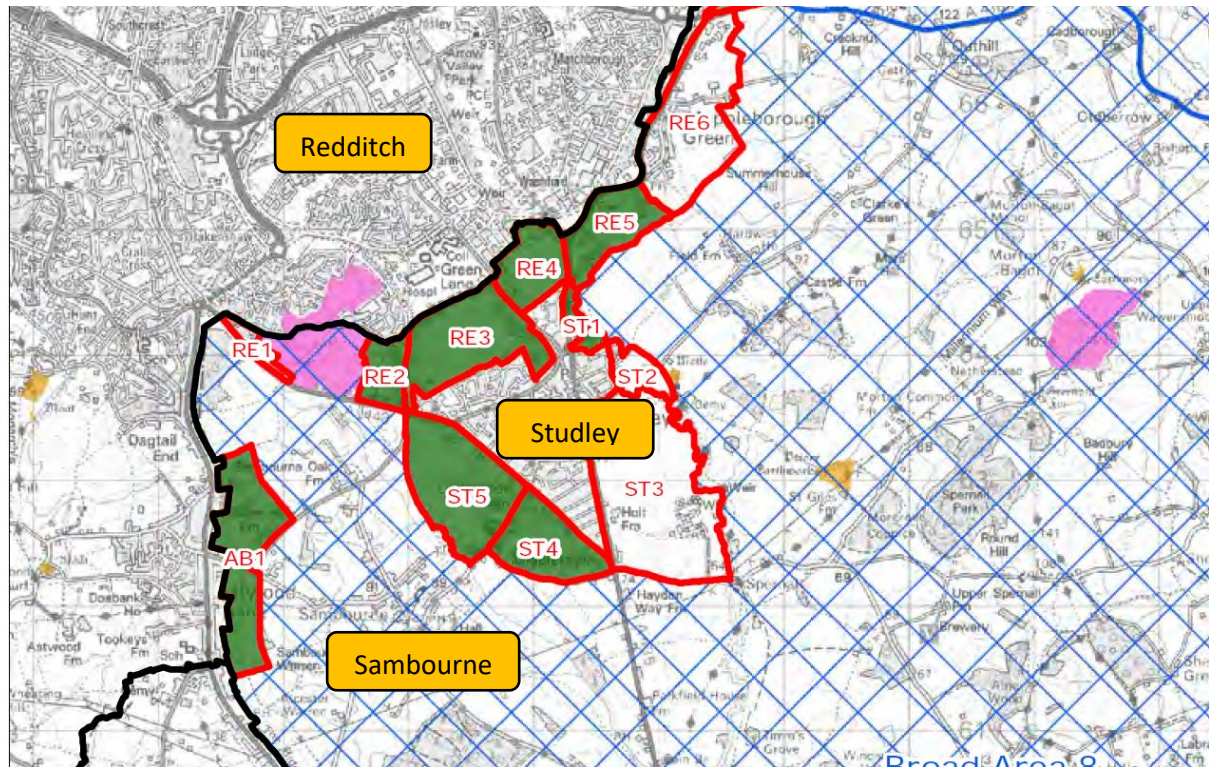
The Lichfield study considered the width of the gap between settlements, whether there were intervening settlements or other development, and whether the parcel would close the gap or allow a settlement to be absorbed into the large built-up area. “Towns” was taken to mean all settlements within the study area and adjacent authorities.

Critique

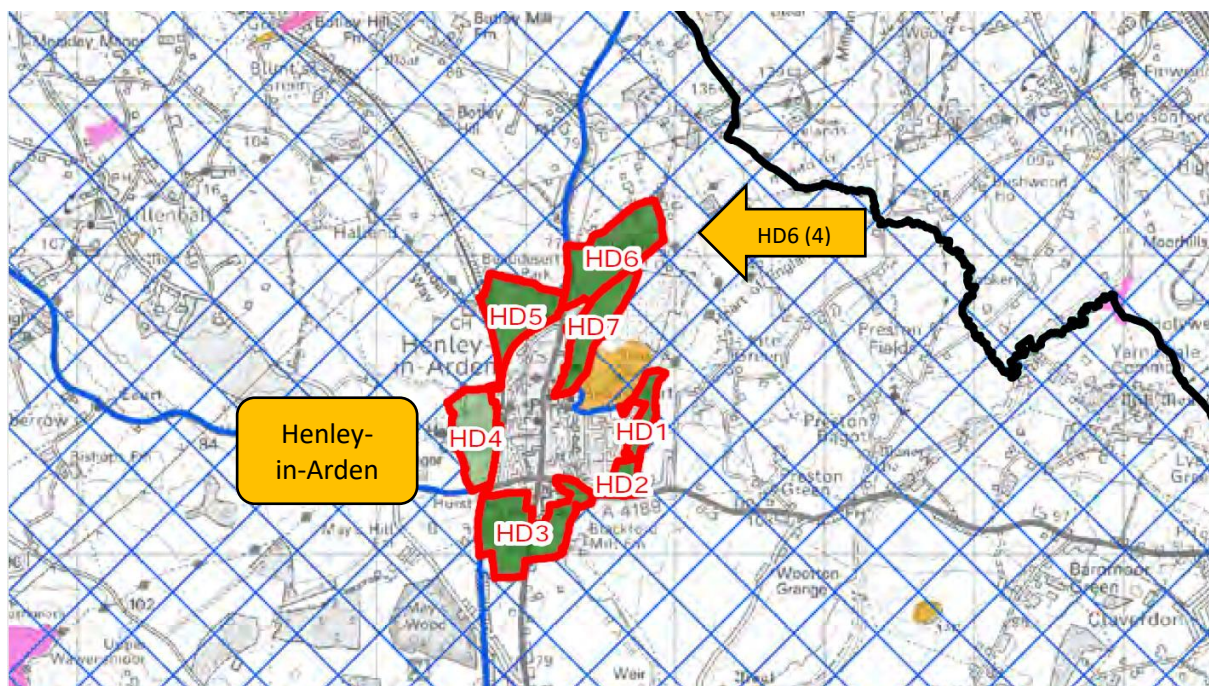
The use of distance as the sole factor in determining likelihood of merging is not considered to be faulty. Some reviews consider factors such as barrier and connecting features, and there may be some merit in doing so. For example, a strong barrier feature (e.g. a wooded ridge line) might help maintain the separate identity of two settlements with a narrow physical gap. However these introduce an element of judgement into the scoring criteria, and perceptions of separation may vary considerably depending on the point of view (say of a resident of a settlement, compared to someone travelling from one settlement to the other, or compared to viewing a map or aerial photograph). Additionally, such factors are considered in purpose (c) so there is a risk of “double counting” such features.

The primary criticism of the scoring criteria lies in the fact that “towns” was not defined, and thus the scoring criteria were applied to settlements of all sizes, down to the smallest hamlets. This has led to some surprising scoring.

For example, the gap between the large village of Studley and the much smaller village of Sambourne (parcels ST4 and ST5) has been graded as highly as the gap between Studley and Redditch (parcels RE3 and RE4). All four of these parcels achieve the maximum grade of 4.



Parcel HD6, north of Henley-in-Arden, is given the maximum score of 4 because of its proximity to the tiny hamlet of Buckley Green, which has only a handful of houses.



Arguably there may be strong reasons for wishing to apply purpose (b) to settlements smaller than a strict definition of “town”, and this approach is found in the reviews compared. For example, it would be expected that the separation between Redditch and Studley should be maintained, despite Studley’s status as a village. At the other end of the scale, it would clearly not be appropriate to use purpose (b) to maintain the separation between a town and a single isolated dwelling. It appears that a threshold should be established somewhere on this spectrum.

It should be noted, however, that population size alone may not be appropriate for establishing a threshold. There could be smaller places with a strong separate identity that requires protection.

Additionally, the presence of a smaller settlement between two towns can act as a stepping stone for development, increasing the likelihood of coalescence.

Suggested approach for South Warwickshire

To define which settlements will be considered “towns”. In this context, it is likely that the list of “towns” should include some settlements that would normally be considered as villages. To additionally define “stepping stone” settlements between larger towns or villages.

To apply the C&W scoring criteria when one of the defined settlements falls within the specified distances of the land parcel. Where the only settlement within the specified distance is not on the defined list, the parcel scores 0.

Purpose (c): to assist in safeguarding the countryside from encroachment

C&W approach

The scoring criteria consider whether the land parcel has the characteristics of countryside, or whether it has been already been affected by encroachment. It then looks for boundary features which would also have the effect of preventing encroachment. The detailed scoring criteria can be seen in the table below.

Criteria	Score / Value	Assessment method notes
Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?	If land parcel contains the characteristics of countryside, has no urbanising development, and is open, 2	Encroachment from urbanising influences is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit.
Has the parcel already been affected by encroachment of urbanised built development?	If land parcel contains the characteristics of countryside, has limited urbanising development, and is relatively open, 1	Urbanising influences include features such as roads lined with street lighting and pavements, large areas of hardstanding, floodlit sports fields, etc.
	If land parcel does not contain the characteristics and/or is not connected to land with the characteristics of countryside, or contains urbanising development that compromises openness, 0	Urbanising built development does not include development which is in keeping with the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches. Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.
Are there existing natural or man-made features / boundaries that would prevent encroachment of the countryside within or beyond the parcel in the long term? (These could be outside the parcel).	If no significant boundary, 2 If less significant boundary, 1 If significant boundary, 0	Readily recognisable and permanent features are used to define the borders of Green Belt parcels. The presence of features which contain development and prevent encroachment can, in certain locations, diminish the role of a Green Belt parcel in performing this purpose. The significance of a boundary in safeguarding the countryside from encroachment is judged based on its relative proximity to the existing urban edge of a settlement and its nature. Boundaries are assumed to play a stronger role (and the Green Belt parcel, therefore, a weaker role) in

Criteria	Score / Value	Assessment method notes
		<p>inhibiting encroachment of the countryside when they are located relatively close to the existing urban edge of a settlement because if the Green Belt parcel were released they would represent a barrier to further encroachment of the wider countryside.</p> <p>Where boundaries border the existing urban edge of a settlement, any further expansion of the settlement would breach that boundary and it would play no further role in preventing encroachment of the wider countryside. In these cases, the Green Belt parcel is judged to play a stronger role in preventing encroachment.</p> <p>Boundaries that are more permanent in nature or more difficult to cross are assumed to play a stronger role in inhibiting encroachment of the countryside. Examples include railway lines, rivers, and motorways/dual carriageways. Examples of boundary types that are assumed to play a weaker role include streams, canals, and topographic features, such as ridges.¹⁰</p> <p>Footpaths and minor roads play an even weaker role.</p>

Comparison to other reviews

In Birmingham, assessment considered the presence of strong boundaries to contain development and prevent encroachment in the long term; and the presence of existing urban influences.

The Black Country study assessed whether a parcel had the characteristics of open countryside, i.e. an absence of built or other urbanising uses.

In Bromsgrove, the assessment considered the existing rural sense of a parcel and any urbanising development.

¹⁰ The relative permanence of a boundary, although relevant to the assessment of parcels of land against Purpose 3, is not, in itself, directly linked to the significance of its role in inhibiting encroachment of the countryside, e.g. streams, canals and topographic features are permanent but development can relatively easily be accessed from the corridor in which the feature lies.

In Lichfield, parcels were assessed according to whether they had the character of open countryside, the existence of boundary features and development.

Critique

The methodology is considered sound, and is broadly in line with that seen in other reviews. The criteria in the first part are a good reflection of whether a parcel is already subject to urbanisation, and parcels with less urbanisation are considered to play a stronger role in preventing encroachment. In the second part, boundary features are considered to play a role in restricting growth, variable according to the significance of the feature. It is reasonable to infer that Green Belt designation plays a lesser role in preventing encroachment when there are strong boundary features present.

Suggested approach for South Warwickshire

To use the C&W methodology unchanged.

Purpose (d): to preserve the setting and special character of historic towns

C&W approach

The scoring criteria assess the potential impact of development in a parcel on the historic core of a defined list of historic towns. This impact is determined by whether the parcel is in or adjacent to a Conservation Area, and whether the parcel has good intervisibility to the historic core.

Criteria	Score / Value	Assessment method notes
Is the parcel partially or wholly within or adjacent to a Conservation Area within an historic town?	If parcel is partially or wholly within or adjacent to a Conservation Area within an historic town and has good intervisibility with the historic core of the town, 4	The following historic towns are considered in the assessment: (for Stage 1 authorities) <ul style="list-style-type: none">• Coventry• Rugby• Bedworth• Nuneaton• Warwick• Hinckley• Kenilworth• Royal Leamington Spa (for Stage 2 authorities) <ul style="list-style-type: none">• Alcester• Birmingham• Coleshill• Henley-in-Arden• Redditch• Stratford• Tamworth Site visits and topographic mapping are used to inform judgements as to whether land parcels have good intervisibility with the historic core of an historic town.
Does the parcel have good intervisibility with the historic core ¹¹ of an historic town?	If parcel is partially or wholly within or adjacent to a Conservation Area within an historic town or has good intervisibility with the historic core of the town, 2	
	If parcel has none of these features, 0	

Comparison to other reviews

In Birmingham, this purpose was not assessed because there were no historic towns in or close to the study area.

The Black Country review considered whether the land and its openness made a key contribution to the characteristics which contribute to a historic town's setting or special character. It found that none of the historic towns in or close to the study area had a special character to which their landscape setting made sufficient contribution to warrant assessment in relation to this purpose.

In Bromsgrove District, only Bromsgrove town itself was considered a "historic town". There is considerable development between the historic core of the Conservation Area and the surrounding

¹¹ The historic cores of the historic towns identified by the Steering Group have been defined using the Conservation Areas which sit close to the centre of each historic town.

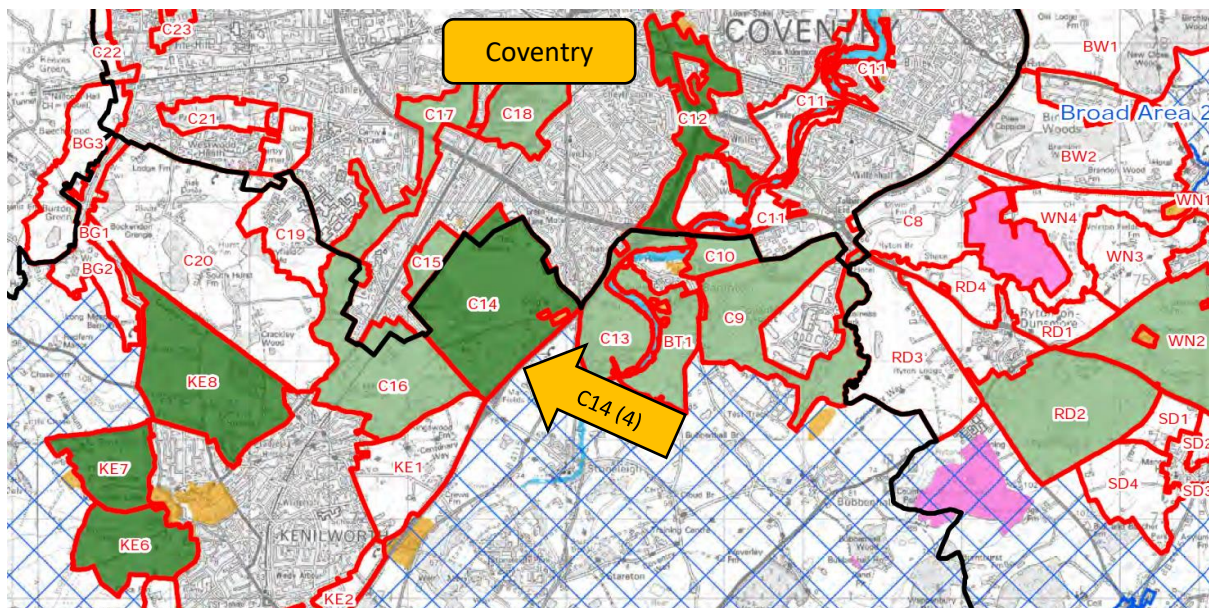
Green Belt, so it was considered that this purpose has little relevance when assessing land parcels in Bromsgrove District, and it was not further considered.

The Lichfield study considered whether the parcel was within or adjacent to a historic town, intervisibility with the historic core, public access within the parcel, and whether the parcel forms part of a historic landscape related to the historic town. “Historic towns” were defined as Lichfield City, Tamworth, Rugeley and Cannock.

Critique

A possible criticism of the methodology is that it presupposes that the visibility of any development is necessarily harmful to the historic core of a town. In reality this is not the case, and there will be many locations where well-designed development can happen in or adjacent to a Conservation Area, or in a site visible from the historic core, without detriment to any heritage assets. Urban heritage assets especially are, by their nature, part of the built-up fabric of a town and it would not be reasonable to argue that they are always harmed by further urban development in the vicinity. Arguably the C&W approach here goes beyond the intentions of purpose (d).

For example, land parcel C14 scored the highest possible (4) because of a slight interaction with a Conservation Area along Kenilworth Road, and intervisibility to the historic Core of Coventry, some distance away to the north. It is difficult to see how development here could have any harmful effect on the historic core, and this scoring feels overly conservative.



Despite this potential shortcoming, it is not clear how the scoring criteria could be meaningfully adjusted. In reality, the outcome of this criteria is unlikely to be viewed in isolation from other factors, and on balance it is better that it is slightly over-conservative rather than the other way around.

This defined list of historic towns appears appropriate and no changes are proposed.

Suggested approach for South Warwickshire

To use the C&W methodology unchanged.

For clarity, the historic towns from the defined list which would be considered in a South Warwickshire review are:

- Alcester
- Coventry
- Henley-in-Arden
- Kenilworth
- Leamington Spa
- Redditch
- Stratford-upon-Avon
- Warwick

Purpose (e): to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

C&W approach

All parcels were given an equal score of 4 (the maximum possible). This is because all land parcels are judged to make an equal contribution to this purpose. The explanation given in the C&W review is shown in the table below.

Criteria
The Local Authorities involved in this review are covered by the Coventry and Warwickshire Housing Market Area (HMA) ¹² . Defining the area as an HMA reflects the key functional linkages that operate between where people live and work and the household demand and preferences that define the area. As the whole Housing Market Area functions as one unit, this makes it difficult to accurately assess whether one individual parcel considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. What can be said is that all parcels make an equally significant contribution to this purpose and are each given a score of 4.

Comparison to other reviews

All the compared reviews make the same judgement, either scoring all parcels equally, or omitting this purpose from the scoring process.

Critique

It could in theory be possible to score parcels against their contribution to purpose (e), on the assumption that parcels adjacent to a settlement would be subject to varying development pressure depending on the state of the market in that settlement. The greater the development pressure on greenfield sites, the greater role the Green Belt would have in encouraging the re-use of brownfield land.

So a parcel would have a greater role when its adjacent settlement has:

- A buoyant market, with high house prices and commercial land prices
- A high number of speculative planning applications
- Larger settlements with reasonable development options
- A plentiful supply of brownfield land; and
- This brownfield land not subject to significant contamination

However, this would be complicated to determine, and reliant on data which is not necessarily available at settlement scale, is prone to fluctuations, is not freely available, and in some cases may not exist at all.

On balance it is considered reasonable to score all land parcels equally with regard to purpose (e).

Suggested approach for South Warwickshire

To use the C&W approach unchanged.

¹² Coventry and Warwickshire Joint Strategic Housing Market Assessment, 2014

Conclusion

A critique has been conducted of the Coventry and Warwickshire Green belt review methodology (2015 and 2016 studies). As part of this critique, an overview is given of the methodologies used in four Green Belt reviews in other areas of the West Midlands Green Belt. In many areas, these reviews are closely aligned with the C&W review and with each other; in other areas, there is considerable variation.

In some cases these variations reflect differences in the study areas. For example, authorities which form part of the West Midlands conurbation are faced with different challenges to those in the neighbouring rural areas; and authorities whose undeveloped land area is wholly within the Green Belt may consider things in a different way to authorities which also have open countryside beyond the Green Belt area boundary.

Variations in approach have also been found which cannot be attributed to the nature of the authority or study area. As central government do not provide detailed advice on review methodology, it is likely that these differences simply reflect a variety of approaches which could be equally legitimate. Whether one approach is superior to another is a matter of judgement.

This critique of the Coventry and Warwickshire methodology has found that in the main the methodology is sound; but that it has the potential for overly conservative grading of land parcels in some cases. This could be avoided by defining key terms such as “large built-up area” and “town”. Such definitions would help to ensure that gradings are a true reflection of how a parcel performs against each of the 5 purposes of Green Belt. This would mean that the parcels which are most valuable for the Green Belt as a whole can be more effectively identified and protected.

It is further considered that the C&W methodology would benefit from the addition of a further step, which considers the effect on the wider Green Belt if a land parcel, or combination of parcels, were removed.

A parallel assessment of washed-over villages is also suggested as being beneficial in South Warwickshire.

Should proposed locations for growth justify it, then it is suggested that parcels are identified and assessed for potential designation as new Green Belt.