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Joint Green Belt Study

**Coventry City Council, North Warwickshire Borough Council,
Nuneaton and Bedworth Borough Council, Rugby Borough
Council, Stratford-on-Avon District Council and Warwick District
Council**

Stage 1 Final Report for Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council

Prepared by LUC
June 2015



Project Title: Joint Green Belt Study

Client: Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council

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1 Introduction

Purpose of the study

- 1.1 LUC was appointed by six West Midlands councils to undertake a comprehensive assessment of Green Belt land within Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council. The study was overseen by a Steering Group comprising officer of these local authorities.
- 1.2 The study assessed the Green Belt against the five purposes of Green Belts, as set out in the National Planning Policy Framework (NPPF). Its purpose was not to identify land for removal from or addition to the Green Belt. Such decisions will need to be taken in the context of wider evidence relating to exceptional circumstances for removing land from the Green Belt (or adding land to it) and the sustainability of spatial development options. The relative performance of Green Belt parcels may form part of such a review.
- 1.3 This Green Belt study complements other studies on other issues, such as housing capacity, biodiversity and landscape, cultural heritage and employment and infrastructure needs. Together, these studies will provide a comprehensive evidence base to appraise and arrive at the most sustainable pattern of development.

Meeting the Duty to Cooperate

- 1.4 Section 110 of the Localism Act (2011) describes English Local Authorities' 'duty to co-operate'. The duty:
 - Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas.
 - Requires that councils and public bodies '*engage constructively, actively and on an on-going basis*' to develop strategic policies to address such issues.
 - Requires councils to consider joint approaches to plan making.
- 1.5 Paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate, and includes a number of cross boundary issues that are closely linked to Green Belt. The authorities in the sub-region have a close working relationship, demonstrated through previous joint studies and their approach to this Green Belt Review. Efforts have also been made as part of this study to engage and work with authorities in the surrounding HMAs. Contact was made with these authorities to make them aware of this study and consult them on the methodology used.

Stage 1 report

- 1.6 The Green Belt study was undertaken in two stages. Stage 1, the subject of this report, assessed the Green Belt within Coventry City, Nuneaton and Bedworth Borough, Rugby Borough and Warwick District. Stage 2 will study the Green Belt within North Warwickshire Borough and Stratford-on-Avon District towards the end of 2015.
- 1.7 This Stage 1 report sets out the context for the study, in terms of the national policy context and the evolution and character of the West Midlands Green Belt. It then describes the study methodology and identifies the parcels of land assessed. Finally, the report sets out the study findings for the Stage 1 authorities, draws overall conclusions and makes recommendations on the next steps.

2 Context

National Green Belt policy

- 2.1 The National Planning Policy Framework (NPPF) takes forward the previous national Green Belt policy set out in PPG2 (Green Belts). Paragraph 79 of the NPPF states that *'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'*.
- 2.2 This is elaborated in NPPF paragraph 80, which states that Green Belts should serve five purposes, as set out in Box 1 below:

Box 1: The purposes of Green Belt

- 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.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.3 The NPPF emphasises in paragraph 83 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state that *'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'*.
- 2.4 Paragraph 84 of the NPPF indicates that *'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*.¹
- 2.5 National Planning Policy Guidance (NPPG) on Green Belt says that, once a local planning authority has established its objectively assessed housing need, a Strategic Housing Land Availability Assessment should be prepared that takes *"account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need"*.
- 2.6 Paragraph 85 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. New boundaries should be defined clearly, using readily recognisable, permanent physical features.
- 2.7 Paragraph 82 of the NPPF indicates that, if proposing a new Green Belt, local planning authorities should:
- demonstrate why normal planning and development management policies would not be adequate;

¹ This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

2.8 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states “*local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land*” (Paragraph 81).

2.9 It is important to note, however, that these positive roles should be sought for Green Belt, once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.

Lessons from planning practice

2.10 As well as taking account of planning policy guidance, this study acknowledges the key relevant points from recent planning practice. These include:

- Green Belt studies should be “fair, comprehensive and consistent with the Core Strategy’s aim of directing development to the most sustainable locations”. Green Belt reviews should be ‘comprehensive’ rather than ‘selective’.²
- Green Belt studies should be clear “how the assessment of ‘importance to Green Belt’ has been derived” from assessments against the individual purposes of Green Belt.³ Such assessments against the purpose should form the basis of any justification for releasing land from the Green Belt.⁴
- In reviewing land against the purposes, Green Belt studies should consider the reasons for a Green Belt’s designation as they are related to the purposes.⁵
- Green Belt studies should “take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process.”⁶

The West Midlands

Evolution and character of the Green Belt

2.11 The Green Belt within Coventry and Warwickshire is part of the larger West Midlands Green Belt. Although local authorities in the West Midlands first put forward proposals for a West Midlands Metropolitan Green Belt in 1955, it was not formally approved by the Secretary of State until 1975. Today the Green Belt covers almost 1500 square kilometres, surrounding the Black Country, Coventry, Birmingham and Solihull.

2.12 Generally, the West Midlands Green Belt has prevented the sprawl of Birmingham, Wolverhampton and Coventry, merging of surrounding towns and encroachment into the

² *Inspector’s report (A Thickett) to Leeds City Council (September 2014)*

³ *Inspectors’ Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)*

⁴ *Inspector’s interim findings (H Stephens) to Durham City Council (November 2014)*

⁵ *Inspector’s interim findings (H Stephens) to Durham City Council (November 2014)*

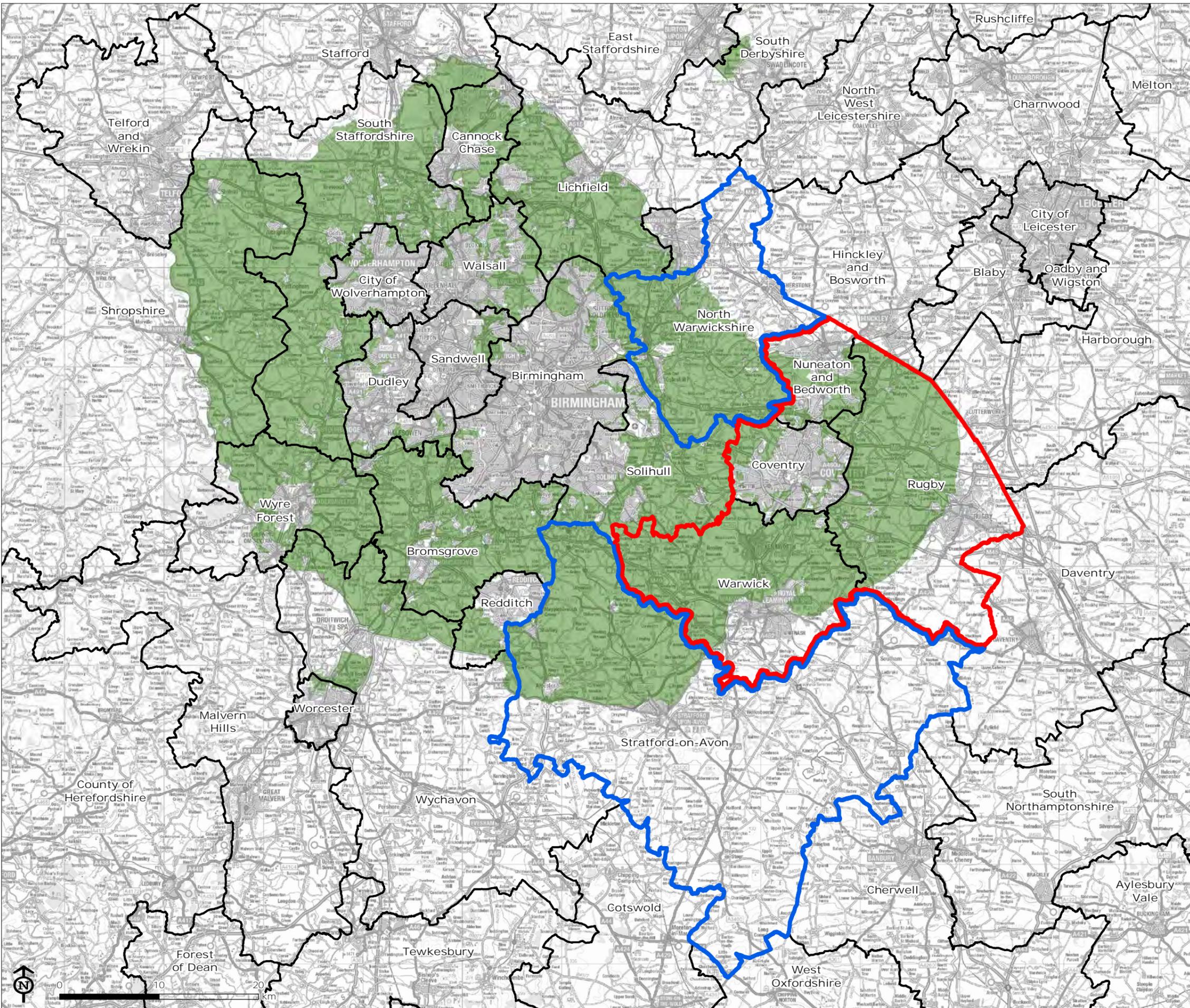
⁶ *Inspectors’ Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)*

surrounding countryside. It has also helped to preserve the setting and special character the main urban areas, as well as smaller settlements. At a strategic level, the Green Belt, tightly drawn around settlements, has helped to encourage regeneration by directing development to brownfield sites within the major urban areas. However, some pockets at the urban fringe have been compromised and degraded by infrastructure projects such as roads and power lines, and other urban intrusions.

2.13 The current extent of the West Midlands Green Belt is shown in **Figure 1**.

Figure 1
West Midlands Green Belt and the Study Context

- Local Planning Authority Boundary
- Green Belt
- Stage 1 Local Authorities
- Stage 2 Local Authorities



Map Scale @ A3: 1:375,000



Housing need and pressures on the Green Belt

- 2.14 The need for new housing, coupled with insufficient sites within existing built-up areas, leads to inevitable pressure to identify land for release from the Green Belt. While this can result in significant local opposition, partly a result of the success of Green Belt policy over the years, local plans can offer opportunities to accommodate development which will help to support local services, provide affordable homes for local people, and potentially improve accessibility.
- 2.15 The Councils within the Steering Group prepared a Joint Strategic Housing Market Assessment (SHMA) which reported in November 2013. An Annex to the SHMA was published in September 2014. The Annex concluded that a minimum delivery of 4,000 homes per annum to 2031 would be required across the Housing Market Area (HMA). The Annex notes that the need for housing in individual local authorities should be regarded as 'indicative' with greater weight placed on figures for housing need across the HMA; however, the Economic Prosperity Board have agreed the distribution of housing across the HMA outlined in the table below.

Table 2.1 Annual Distribution of Housing Need Across HMA (per annum 2011-2031)⁷

	HMA	Coventry	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick
2012 SHMA Housing Need per Annum	4,004	1,811	204	422	453	508	606
CLG 2012-Projections	4,100	1,955	167	445	464	477	592

- 2.16 **Table 2.1** highlights the demographic needs set out in the SHMA Annex. Through the Duty-to-Cooperate process the authorities have already recognised that Coventry may not be able to provide sufficient land to meet its own housing needs. Work is on-going to determine the most robust and appropriate distribution of housing to meet the needs of the HMA in full, whilst also having the least impact on green spaces (including the Green Belt) and supporting the most sustainable forms of development.

Local Plans

- 2.17 This section contains a brief summary of the current status of the Local Plans within the four Councils involved in Stage 1 of the Green Belt study.
- Coventry City Council Local Plan*
- 2.18 The Council withdrew its previous Core Strategy from examination in March 2013. The Council are in the process of developing a City-wide Local Development Plan (2011 – 2031) which will set out the vision, objectives and spatial strategy for the future development of the City, linking with the themes of the Coventry Sustainable Community Strategy and demonstrating its deliverability.
- 2.19 The Council published its first stage of community and stakeholder engagement since withdrawing its Core Strategy in September 2014 following an intensive period of evidence gathering to respond to the issues raised by the Inspector during the Examination in Public (EiP) of the withdrawn Core Strategy. The Local Development Plan is due to be adopted in 2016.
- Nuneaton and Bedworth Local Plan*
- 2.20 The Council is in the process of developing a Borough Plan. The Borough Plan will replace the Council's existing Local Plan which was adopted in 2006. The Plan will play a key role in shaping the future of the Borough up to 2031. It will influence what development will take place, how much and where within the Borough it will be located.

⁷ Review of Housing Needs for Warwick District Local Plan, G L Hearn, 2015

2.21 The Preferred Options for the Borough Plan were consulted upon in the summer of 2013. The pre-submission version of the Borough Plan will be consulted upon in 2015.

Rugby Borough Council Local Plan

2.22 The Council adopted their Core Strategy DPD (2006-2026) containing a statement of vision, core policies and a spatial strategy for Rugby Borough in June 2011. The development strategy team are now in the process of developing the Rugby Borough Plan, a strategic document that builds upon the Core Strategy and replaces the saved Local Plan policies of 2009. The Preferred Options for the Rugby Borough Plan are due to be launched for consultation in August 2015, with a view to adoption in 2016.

Warwick District Council Local Plan

2.23 The Council is in the process of preparing its new Local Plan which will guide the area's future development to 2029. The purpose of the Plan is to set out the long-term spatial vision for how the towns, villages and countryside in the District will develop and change and how this vision will be delivered through a strategy for promoting, distributing and delivering sustainable development. Between May and June 2014, the Council consulted on its Publication Draft Local Plan. The Local Plan was submitted on 30 January 2015 for examination. The initial hearings for the Examination in Public (EIP) took place between the 6th and 12th of May 2015.

2.24 The Inspector's initial findings raise some serious concerns regarding the soundness of the plan in relation to planning effectively across the Housing Market Area. At the time of writing the Council is considering its options going forward with the Local Plan that is currently being examined.

3 Methodology

- 3.1 The Green Belt study drew on good practice across England and on LUC's experience elsewhere. The method is:
- **Objective** – assessment criteria are based on national planning policy and the performance of parcels of land against these criteria is objectively assessed, ensuring that the justification of each score is clear and as free from value judgements as possible.
 - **Simple and Consistent** – no Green Belt purpose is considered more important than any other in the NPPF so no weighting has been applied in the method.
 - **Focussed** – on the purposes of Green Belt and does not consider the relative values of parcels of land as ecological or landscape assets. While it is important to consider the wider benefits of Green Belt as countryside, these benefits are not an explicit policy objective of Green Belt designation and should only be considered once Green Belt has been defined.
- 3.2 The study considers all existing Green Belt within the Coventry and Warwickshire sub-. As described in the introduction, this joint Green Belt study is being undertaken in two stages. Stage 1 (recorded in this report) studies the Green Belt within Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council. Stage 2 will study the Green Belt within North Warwickshire Borough Council and Stratford-on-Avon District Council towards the end of 2015.
- 3.3 The method presented below has been developed by LUC in conjunction with the Steering Group and in consultation with their wider 'duty to co-operate partners' (i.e. adjoining authorities in surrounding Housing Market Areas (HMAs)). This methodology was applied consistently across the four local authorities involved in Stage 1 of the study and will be applied consistently for the three local authorities involved in Stage 2 of the study.

Defining the context and characterising the Green Belt

- 3.4 Understanding the Green Belt purposes in the sub-region has been important for designing an effective methodology for the Green Belt Review. Local knowledge has helped inform the complex judgements on the relative performance of individual Green Belt parcels. The historical context of the West Midlands Green Belt and the spatial strategy and settlement hierarchy of the Boroughs and Districts were considered before any assessment of parcels.

Constraints mapping

- 3.5 The Steering Group agreed to exclude the following primary environmental constraints within the study area on the grounds that development within such areas is likely to be inappropriate. These are:
- Internationally designated wildlife sites: Special Areas of Conservation, Special Protection Areas, Ramsar sites, Sites of Community Importance.
 - Nationally designated wildlife sites: Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs).
 - Scheduled Monuments.
 - Areas at high risk of flooding (Flood Zone 3b).
- 3.6 Locations affected by primary constraints were mapped using GIS data supplied by the local authorities and used to define the edges of parcels of Green Belt for detailed assessment.

Although the primary constraints have been excluded from parcels, their presence is acknowledged in the assessments and reflected in the judgements so far they are relevant to the five Green Belt purposes.

Land parcel definition

- 3.7 Green Belt land adjacent to the Stage 1 local authorities' main settlements were been divided into parcels for assessment. **Table 3.1** lists the large built-up areas and main rural villages in the Stage 1 study area agreed by the Steering Group to be appropriate for parcelling.

Table 3.1 List of large built-up areas and main rural villages within the Stage 1 study considered appropriate for parcelling

Coventry
Allesley; Coventry; Keresley
Nuneaton & Bedworth
Ash Green; Bedworth; Bulkington; Neal's Green; Nuneaton
Rugby
Binley Woods; Brinklow; Hinckley; Long Lawford; Rugby; Ryton-on-Dunsmore; Stretton-on-Dunsmore; Wolston; Wolvey
Warwick
Burton Green; Cubbington; Hampton Magna; Hatton; Kenilworth; Kingswood; Leek Wootton; Royal Leamington Spa; Warwick

Parcel identification method

- 3.8 Land parcels were defined by referring to OS and Mastermap maps and aerial images to identify clear, robust boundaries around areas of the same or very similar land use or character. The following physical features were considered readily recognisable and likely to be permanent and, therefore, potentially suitable for delineating Green Belt boundaries:
- Significant natural features – for example, substantial watercourses and water bodies.
 - Significant man-made features – for example, motorways, A and B roads and railway lines⁸, and established infrastructure and utilities such as sewage treatment works.
- 3.9 Woodland, hedgerows and tree lines were considered to be recognisable but less permanent boundaries; streams and ditches are considered to be both recognisable and permanent but less significant boundaries than those above. However, where appropriate, both were used to define land parcel boundaries.
- 3.10 The Green Belt parcels identified in the 2009 Joint Green Belt Review for Coventry City, Nuneaton and Bedworth, Rugby and Warwick Councils⁹ have been taken in to consideration as part of the parcel identification process for Stage 1 of this joint Green Belt study. It should be noted that large areas of Rugby and Warwick were not divided into parcels for the 2009 review. The now revoked West Midlands Regional Spatial Strategy focussed growth in towns and limited growth in villages. In the absence of an agreed alternative spatial strategy, only Green Belt land adjacent to the large built-up areas and the main rural settlements listed in Table 3.1 was assessed..

⁸ The planned route of High Speed 2 (HS2) has not been used as a significant boundary to defined parcels for assessment, nor has its potential proximity to existing urban edges been used to influence judgements. This is due to the fact that construction of the scheme has yet to start and certain details have yet to be finalised.

⁹ SSR Planning, Coventry Joint Green Belt Study, 2009.

Parcels identified in the 2009 study that do not border the large built-up areas or main rural settlements listed in **Table 3.1** were subsumed in to broad areas identified as being the main body of the Green Belt and thus making a strategic contribution to the Green Belt purposes (see below).

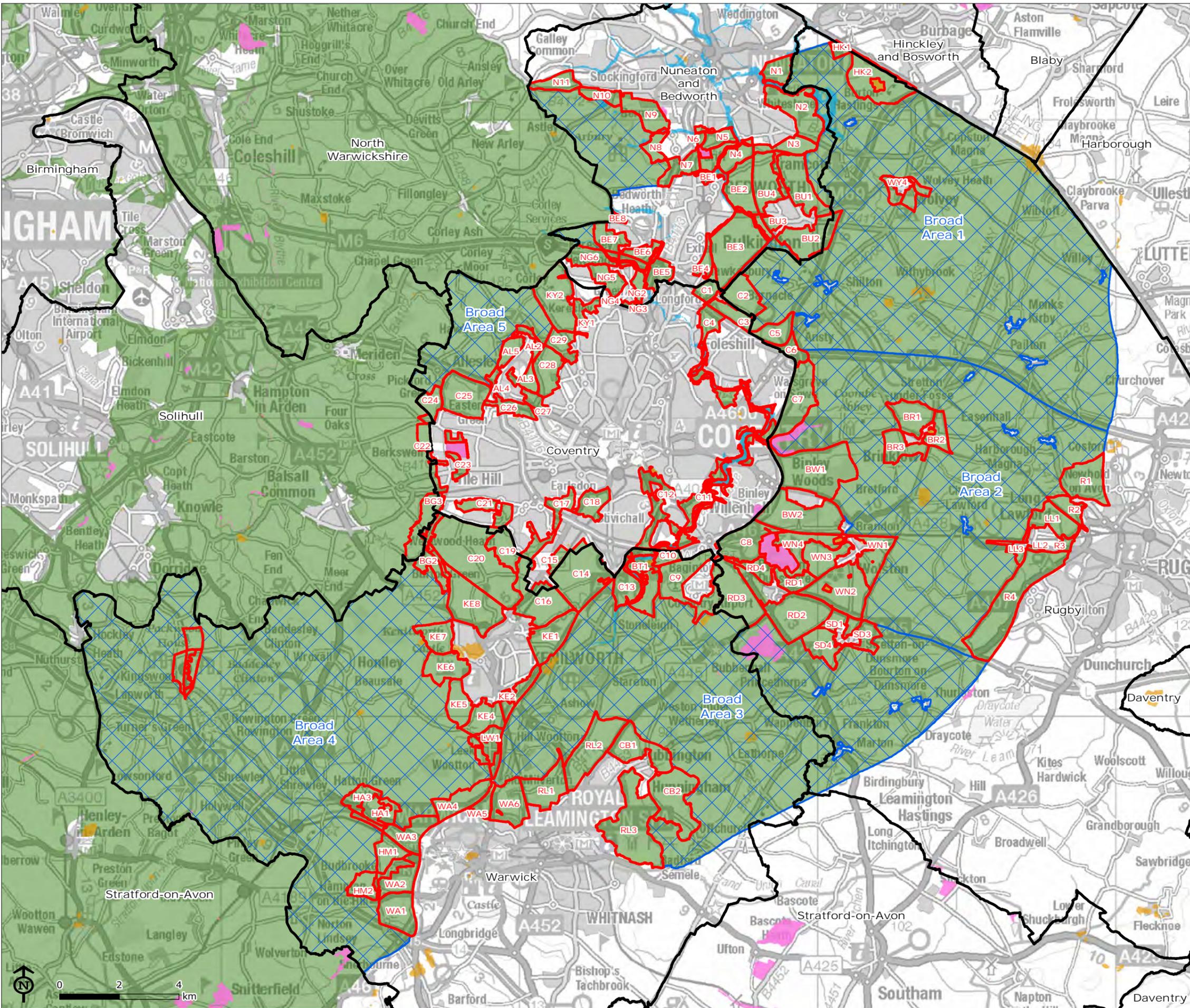
- 3.11 The Councils have historically taken different approaches to defining their Green Belt boundaries; some have opted to 'wash over' all but the largest settlements with the Green Belt designation, while others have opted to omit the urban areas or most of their rural villages from Green Belt designation. For consistency, Green Belt parcels were defined adjacent to all the large built-up areas and main rural villages listed in **Table 3.1**, including those that have been washed over with the Green Belt designation.

Broad areas of Green Belt remote from the large built-up areas and main rural villages

- 3.12 Following the identification of parcels of land adjacent to the Stage 1 authorities' large built-up areas and main rural villages, the remaining areas of Green Belt – the largely open and undeveloped countryside between the large built-up areas and main rural villages – were defined as 'broad areas'. As the main body of the Green Belt, these broad areas were assumed to make a considerable contribution to Green Belt purposes. As such, the detailed criteria-based assessment applied to the Green Belt parcels adjacent to the settlements outlined in **Table 3.1** was not used. Instead, a broader descriptive assessment was undertaken, outlining why these larger, more strategic areas of the Green Belt fundamentally fulfil the purposes of this strategic designation in the West Midlands. The separate broad areas were defined using significant linear features, such as motorways and dual carriage ways.
- 3.13 **Figure 2** illustrates the parcels and broad areas defined for assessment in Stage 1 of the joint Green Belt study.

Figure 2
Parcels and Broad Areas Defined for Assessment in Stage 1

-  District Boundary
-  Land Parcel
-  Broad Area
-  Green Belt
-  SSSI
-  Scheduled Monument
-  Flood Zone 3b



Map Scale @ A3: 1:125,000



Identifying and consulting on the method

- 3.14 A method statement was produced in December 2014 setting out the context of the study, the reasoning and method for identifying the land parcels and broad areas and the assessment criteria to be used in the review of the parcels.
- 3.15 In addition to working together to undertake this Green Belt Review the Steering Group consulted with neighbouring authorities on the method to be used in this study in the interests of further fulfilling their 'duty to co-operate' under the Localism Act. A three week consultation was undertaken between the 22nd December 2014 and the 12th January 2015.
- 3.16 Twenty two neighbouring authorities were consulted. Four neighbouring authorities provided feedback (West Northamptonshire Joint Planning Unit, Birmingham City Council, Cherwell and South Northants Councils and Lichfield District Council). The feedback was reviewed and where appropriate taken on board in refining the methodology.
- 3.17 A list of the local authorities consulted and a summary table of the comments received and Steering Group's response is provided in **Appendix 3**.

Assessment

- 3.18 The finalised land parcels and broad areas were assessed against the five purposes of Green Belt.

Assessment criteria

- 3.19 **Table 3.2** sets out the five Green Belt purposes and the criteria used to assess the parcels against each purpose. It then sets out all the potential scores that can be assigned to each criterion along with some notes on how the judgements associated with each criterion were made. The information in **Table 3.2** helped ensure consistency was achieved throughout the assessment of the land parcels. It also provides a high level of transparency, enabling the assessment to be understood and potentially repeated at a future date by others.
- 3.20 In order to avoid unintentional 'weighting' of any single purpose, the minimum and maximum scores for any purpose are the same (i.e. between naught and four for purposes 1-4¹⁰). All parcels score four for purpose 5 (to assist in urban regeneration by encouraging the recycling of derelict and other urban land). This is on the basis that all Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites.

¹⁰ Purposes 1 and 3 have two criteria; Purposes 2 and 4 have one criterion; all purposes (1-5) have the potential to score 4.

Table 3.2 Green Belt review criteria

NPPF Green Belt Purposes	Criteria	Score /Value	Assessment method notes
<p>1 To check the unrestricted sprawl of large built-up areas.</p>	<p>a 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?</p>	<p>If strong role (parcel inhibiting development along two or more sides of a road corridor), 2</p> <p>If some role (parcel inhibiting development along one side of a road corridor), 1</p> <p>If no role (parcel not inhibiting development along a road corridor), 0</p>	<p>Ribbon development is linear development along any route ways where direct access from a development to the road would be possible.</p> <p>Sprawl is the spread of urban areas into the neighbouring countryside, i.e. the outward expansion of settlements into the neighbouring countryside.</p>
	<p>b Is the parcel free from development? Does the parcel have a sense of openness?</p>	<p>If land parcel contains no development and has a strong sense of openness, 2</p> <p>If land parcel contains limited development and has a relatively strong sense of openness, 1</p> <p>If land parcel already contains development compromising the sense of openness, 0</p>	<p>Development means any built structure.</p>
<p>2 To prevent neighbouring towns merging into one another.</p>	<p>a Is the parcel located within an existing settlement? If no, what is the width of the gap between the settlements at the point that the parcel is intersected?</p>	<p>If the parcel is within an existing settlement or more than 5 km away from a neighbouring settlement, 0</p> <p>If <1 km away from a neighbouring settlement, 4</p> <p>If between 1 km and 5 km away from a neighbouring settlement, 2</p>	<p>Merging is the joining or blurring of boundaries between two settlements.</p> <p>A straight line is measured at the narrowest point between settlements. The line must pass through the parcel being assessed.</p>
<p>3 To assist in safeguarding the countryside from encroachment.</p>	<p>a Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Has the parcel already been affected by encroachment of urbanised built development?</p>	<p>If land parcel contains the characteristics of countryside, has no urbanising development, and is open, 2</p> <p>If land parcel contains the characteristics of countryside, has limited urbanising development, and is relatively open, 1</p> <p>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</p>	<p>Encroachment from urbanising influences is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit.</p> <p>Urbanising influences include features such as roads lined with street lighting and pavements, large areas of hardstanding, floodlit sports fields, etc.</p> <p>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.</p> <p>Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.</p>
	<p>b Are there existing natural or man-made features / boundaries that would prevent encroachment of the countryside within or</p>	<p>If no significant boundary, 2</p> <p>If less significant boundary, 1</p>	<p>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</p>

NPPF Green Belt Purposes		Criteria	Score /Value	Assessment method notes
		beyond the parcel in the long term? (These could be outside the parcel).	If significant boundary, 0	<p>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.</p> <p>Boundaries are assumed to play a stronger role (and the Green Belt parcel, therefore, a weaker role) in 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.¹¹</p> <p>Footpaths and minor roads play an even weaker role.</p>
4	To preserve the setting and special character of historic towns.	a Is the parcel partially or wholly within or adjacent to a Conservation Area within an historic town? Does the parcel have good intervisibility with the historic core ¹² of an historic town?	<p>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</p> <p>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</p> <p>If parcel has none of these features, 0</p>	<p>The following historic towns are considered in the assessment:</p> <ul style="list-style-type: none"> • Coventry • Rugby • Bedworth • Nuneaton • Warwick • Hinckley • Kenilworth • Royal Leamington Spa <p>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.</p>
5	To assist in urban regeneration by encouraging	a The Local Authorities involved in this review are covered by the Coventry and Warwickshire Housing Market Area (HMA) ¹³ . 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		

¹¹ 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.

¹² 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.

¹³ Coventry and Warwickshire Joint Strategic Housing Market Assessment, 2014

NPPF Green Belt Purposes	Criteria	Score /Value	Assessment method notes
the recycling of derelict and other urban land.			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.

3.21 The criteria for assessment against purpose 4 (to preserve the setting and special character of historic towns) were considered to be proportionate and appropriate to a Green Belt study, recognising that there are other forms of planning control for the historic environment and separate bodies of evidence (e.g. historic landscape character assessments). The Stage 1 study assessed the contribution of Green Belt parcels to the setting and special character of the following historic towns, which were agreed by the Steering Group:

- Coventry
- Rugby
- Bedworth
- Nuneaton
- Warwick
- Hinckley
- Kenilworth
- Royal Leamington Spa

3.22 Results and notes from the assessment were input to an Access database which is linked to GIS mapping of the Stage 1 study area to help ensure that records of the assessment are easily accessible. The assessment sheets for each land parcel and broad area within the Stage 1 study area are set out in **Appendix 1** of this report.

Overall scores

3.23 The scores against the criteria were combined to generate a total score for each parcel. The higher the score, the greater the parcel's overall contribution to the Green Belt purposes. The total scores for each parcel are presented graphically in maps in Chapter 4, indicating the overall contribution each parcel makes to the Green Belt purposes.

3.24 While the aggregation of scores across all the purposes is a practical way of understanding the overall and relative contribution of different parts of the Green Belt, the NPPF does not require all the purposes of Green Belt to be met simultaneously. Indeed, even if one purpose is met, a parcel of land could be considered to make a significant contribution to the Green Belt. Therefore, **Appendix 2** contains maps illustrating the parcels' relative contribution to each Green Belt purpose to illustrate the considerable contribution that certain parcels are making to individual Green Belt purposes, contributions which can be lost when scores against all five purposes are aggregated¹⁴. Furthermore, each parcel's score against each of the Green Belt purposes is presented at the end of assessment sheet for each parcel (**Appendix 1**) so that the contribution the parcels make to individual purposes can be explored.

Site visits

3.25 The land parcels and broad areas were assessed remotely in the first instance using GIS mapping, OS maps and aerial images. All the land parcels and broad areas were visited to check their performance against the purposes. Parcels of Green Belt were viewed from the publically accessible road network and public rights of way.

¹⁴ All parcels score 4 for purpose 5. Therefore, no maps have been prepared for purpose 5.

Reporting

- 3.26 This report represents the final output of Stage 1 of the joint Green Belt study. It presents the findings for all parcels and broad areas assessed in Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council. The results of the assessment for each of the parcels and broad areas in the Stage 1 study area are summarised in Chapter 4 below and outlined in further detail in **Appendix 1**.

4 Findings

- 4.1 This Chapter sets out the overall findings of the Stage 1 Green Belt study.
- 4.2 A total of 133 parcels and five broad areas were identified in the Stage 1 local authorities:
- 34 parcels and one broad area fall wholly or partially within Coventry.
 - 32 parcels and two broad areas fall wholly or partially within Nuneaton and Bedworth.
 - 37 parcels and three broad areas fall wholly or partially within Rugby.
 - 43 parcels and two broad areas fall wholly or partially within Warwick.
- 4.3 A series of maps present the overall results of the land parcel assessment for each local authority. **Figures 3, 4, 5** and **6** are maps illustrating the overall contribution of individual parcels to the Green Belt purposes in Coventry, Nuneaton and Bedworth, Rugby and Warwick, respectively.
- 4.4 **Appendix 1** contains all the assessment sheets for all 133 parcels and the 5 broad areas. The assessment sheets contain the detailed judgements behind each score for each criterion against each Green Belt purpose.
- 4.5 As noted earlier, while the aggregation of scores across all the purposes is a practical way of understanding the overall and relative contribution of the Green Belt across the study area, the NPPF does not require all the purposes of Green Belt to be met simultaneously. Therefore, **Appendix 2** contains maps illustrating parcels' relative contribution to each Green Belt purpose to illustrate the considerable contribution that certain parcels are making to individual Green Belt purposes, contributions which can be lost when scores against all five purposes are aggregated¹⁵.

Summary of findings: broad areas

- 4.6 The five broad areas represent the largely open and undeveloped countryside between the large built-up areas and main rural villages within study area. As the 'main body' of the Green Belt (as opposed to the edges), they were considered to make a significant contribution to Green Belt purposes; however, some make a more significant contribution than others.
- 4.7 The following paragraphs highlight the main contributions each broad area makes to the Green Belt purposes and thus the integrity of the wider West Midlands Green Belt.

Broad Area 1

- 4.8 Broad area 1 lies between Nuneaton to the west, Coventry to the south west Hinckley and Lutterworth to the east (with the A5 forming the outer Green Belt boundary). The parcel contains the Registered Park and Garden of Newnham Paddox and two Grade I Listed Buildings – Church of St Edith and the screen, gates and gatepiers of Newnham Paddox Grade II Registered Park and Garden.
- 4.9 The broad area is predominantly made-up of low-lying and flat land reducing the scope for panoramic views in to the historic cores of Coventry, Bedworth and Nuneaton to the west and Hinckley to the north east. Therefore, while the broad area plays some role in preserving the setting and special character of surrounding historic towns, it was considered to make more of a contribution to the other purposes of Green Belt, namely:
- Checking the sprawl of Coventry, Nuneaton, and Bedworth.
 - Preventing the merging of neighbouring towns in the long term, particularly Nuneaton and Hinckley which lie close to one another in the northern part of the broad area. However, the

¹⁵ All parcels score 4 for purpose 5. Therefore, no maps have been prepared for purpose 5.

southern two thirds of the broad area make a less significant contribution to preventing neighbouring towns merging due to there being no towns immediately to the east.

- Safeguarding the countryside.
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.

Broad Area 2

4.10 Broad area 2 lies between Coventry to the west and Rugby to the east. The area contains the Registered Park and Garden of Coombe Abbey, including the Grade I listed Coombe Abbey and SSSIs Coombe Pool and Brandon Marsh. There are a number of significant pockets of ancient woodland within the broad area, including All Oaks Wood, New Close and Birchley Woods, Brandon Wood and Piles Coppice. It makes a considerable contribution to all five purposes of Green Belt:

- Checking the sprawl of Coventry from the west and Rugby from the east.
- Preventing the merging of these urban areas in the long term.
- Safeguarding the countryside, particularly the flood plain of the river Avon.
- Preserving the setting and special character of the historic towns of Coventry and Rugby. Panoramic views of the historic cores of both towns can be seen from a number of locations within the broad area.
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.

Broad Area 3

4.11 Broad area 3 lies between Royal Leamington Spa to the south, Kenilworth to the north west, Coventry to the north and Rugby to the north east. The area contains the Registered Park and Garden at Stoneleigh Abbey, several Scheduled Monuments and Grade I listed buildings and substantial pockets of ancient woodland, including Ryton Wood SSSI.

4.12 The area makes a considerable contribution to all the purposes of Green Belt:

- Checking the sprawl of Royal Leamington Spa, Kenilworth and Coventry.
- Preventing the merging of neighbouring towns in the long term, particularly Royal Leamington Spa and Kenilworth and Kenilworth and Coventry.
- Safeguarding the countryside, including a number of large woodlands, such as Ryton Wood.
- Preserving the setting and special character of the historic towns of Royal Leamington Spa, Kenilworth and Coventry. The historic core of Kenilworth is located on the opposite side of the town, meaning that the broad area makes little contribution to the setting and special character of Kenilworth. However, panoramic views into the historic cores of Royal Leamington Spa and Warwick to the south are common in the southern half of the broad area and there are some distant views of the historic core of Coventry close to the northern edge of the broad area.
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.

Broad Area 4

4.13 Broad area 4 lies between Solihull to the north west and Kenilworth and Coventry to the north east. The area contains the Registered Park and Gardens at Wroxall Abbey, Baddesley Clinton Hall and Packwood House, several Scheduled Monuments and pockets of ancient woodland.

4.14 The area makes a considerable contribution to all the purposes of Green Belt:

- Checking the sprawl of Warwick to the south east and Kenilworth and Coventry to the north east.

- Preventing the merging of these neighbouring towns in the long term, particularly Warwick, Kenilworth and Coventry to the east. However, the south western half of the broad area makes a less significant contribution to preventing neighbouring towns merging due to there being no towns immediately to the west and south west.
- Safeguarding the countryside, including a number of large woodlands, such as Hay Wood.
- Preserving the setting and special character of the historic towns of Warwick, Kenilworth and Coventry. The broad area has excellent views in to the historic core of Kenilworth, and Warwick; however, there are limited views in to the historic core of Coventry to the north.
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.

Broad Area 5

- 4.15 Broad area 5 lies between Coventry to the south east, Bedworth to the east, Nuneaton to the north east and Coleshill and Birmingham to the west. The area contains the Registered Park and Gardens at Arbury Hall, including two Grade I Listed Buildings.
- 4.16 While the broad area sits between the historic towns of Nuneaton and Bedworth and borders Coventry, it has limited intervisibility with the historic cores of these towns. Therefore, while the broad area plays some role in preserving the setting and special character of surrounding historic towns, it was considered to make more of a contribution to the other purposes of Green Belt, namely:
- Checks the sprawl of Coventry to the south east, Bedworth to the east and Nuneaton to the north east.
 - Prevents the merging of Coventry, Bedworth and Nuneaton to the east.
 - Safeguards the countryside, including a number of ancient woodlands.
 - Preserves the setting and special character of historic towns, including Coventry, Nuneaton and Bedworth.
 - Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.

Summary of findings: parcels adjacent to large built-up areas and main rural villages

- 4.17 Figures 3 – 6 illustrate the combined scores for each parcel against all the Green Belt purposes to give an impression of each parcel's overall contribution to the Green Belt purposes. It should be noted, however, that an overall score can mask the significant contribution of a parcel to a single Green Belt purpose, or a relatively poor performance across a number of purposes.
- 4.18 There is not a significant difference between the performance of the Green Belt across the four Stage 1 local authorities – all four authorities contain high-performing and low-performing parcels, with the majority of parcels mid-performing.

Higher-performing Green Belt parcels

- 4.19 Parcels of Green Belt land that contribute to the gaps between the large built-up areas such as Coventry, Rugby, Nuneaton, Bedworth, Warwick/Royal Leamington Spa and Kenilworth and/or the satellite settlements that surround them, generally perform well against the Green Belt purposes; for example AL3, C3, C27, C28 and C29 in Coventry, N3, N4, N5, N7 and BE3 in Nuneaton and Bedworth, R3 and R4 in Rugby and HM1 and WA2 in Warwick. Parcels that contain significant boundaries that could help to limit sprawl, encroachment of the countryside between settlements and in the long term merging between settlements are the notable exceptions to this pattern; for example, N6 and BE1.
- 4.20 Generally, the parcels bordering the southern and western edges of Coventry contribute significantly to the purposes of Green Belt. Some have good intervisibility with the historic core of

Coventry, for example C10 and C14, or Kenilworth (KE8). Sitting in the gap between Kenilworth and Coventry, parcels C16 and KE8 play an important role in helping to prevent the urban areas from merging. In addition, many of the parcels contain roads which would be at risk from ribbon development and few significant boundaries. Without the Green Belt designation, the land within the parcels would therefore be vulnerable to encroachment/sprawl.

- 4.21 The Green Belt parcels bordering Rugby, Warwick and Royal Leamington Spa contribute to the setting and special character of these historic towns (by virtue of good intervisibility with the historic cores). Parcels R1, LL1 and R4 have good views into the historic core of Rugby and parcels RL1, RL2 RL3, WA6, LW2, LW3, WA1, WA2 and HM1 have good views into the historic cores of Royal Leamington Spa and/or Warwick. However, not all parcels with good intervisibility with historic towns abut the towns existing urban edge; for example, parcel WN2 to the south of Wolston has excellent views of the historic core of Coventry from the high ground within the centre of the parcel. Generally, such parcels are very open, largely free from development and urbanising influences.

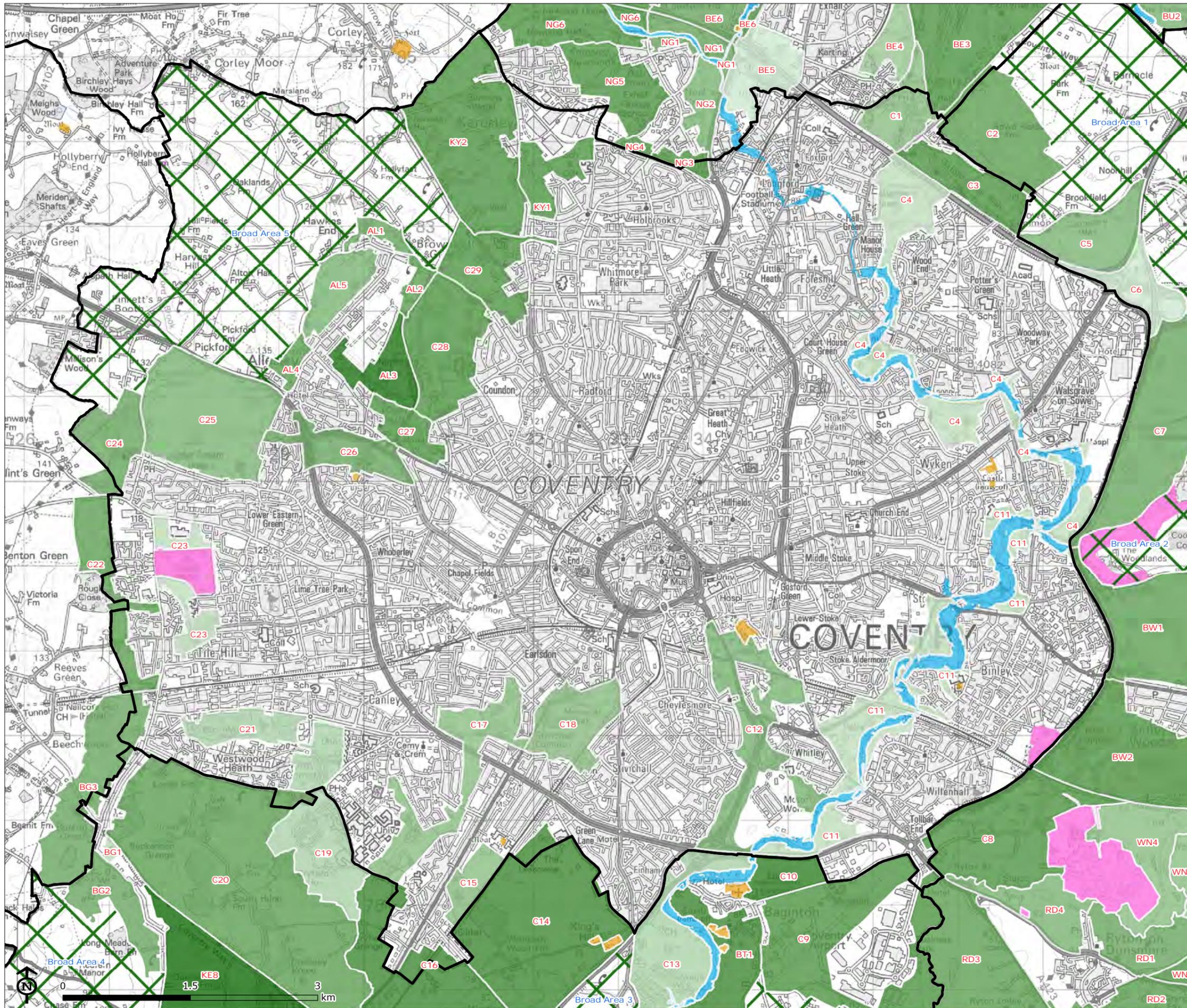
Mid-performing Green Belt parcels

- 4.22 The majority of the parcels within the Stage 1 study area are 'mid-performing', meaning that they score moderately well across all the Green Belt purposes or have a mixture of high and low scores across the five purposes. There is no identifiable spatial pattern to these mid-performing parcels, as their weaker performance is attributable to a range of factors, including the presence of significant boundaries helping to protect the wider countryside from encroachment and reducing the need for the Green Belt to perform this purpose, and developments which compromise the openness of the Green Belt and urbanise the countryside. In some instances, the parcels form part of large gaps between towns, so that the risk of merging of neighbouring towns is more limited.

Low-performing Green Belt parcels

- 4.23 The parcel considered to make the least significant contribution to the Green Belt purposes is parcel BU5 which has been developed and represents an area of significant ribbon development to the north of the village of Bulkington in Nuneaton and Bedworth. BU3 to the west of Bulkington also scores low, primarily due to the role of the railway line on the embankment along the western edge of the parcel which protects the wider countryside from encroachment. Ribbon development has occurred along the roads to the north and south of the parcel. This existing sprawl has been retained by the railway line.
- 4.24 Two parcels in the relatively narrow gap between Bedworth and Nuneaton (BE1 and N6), two either side of Bedworth (BE4 and BE5), C6 in Rugby and KG3 and C13 in Warwick also score low for similar reasons to BU3 – all are retained by significant boundaries that help to protect the wider countryside from encroachment and check sprawl, do not contribute to the setting and special character of historic towns (C13 has some intervisibility with the historic core of Coventry) and contain built development which to varying degrees compromises the openness and/or urbanises the countryside in the parcel.
- 4.25 Parcels C4, C11, C21 and C23 sit entirely within the City of Coventry and therefore play no role in preventing neighbouring towns from merging. None of these parcels has intervisibility with the historic core of the City and all make a relatively low contribution to checking sprawl and safeguarding the countryside from encroachment.
- 4.26 C19 to the south of Coventry in Warwick is also considered to make a less significant contribution to the Green Belt purposes primarily due to the presence of part of the University of Warwick campus in the parcel. The buildings and infrastructure associated with the campus represent significant urbanising influences which have encroached upon the countryside within the Green Belt and compromise its openness.
- 4.27 The development of Broadwell Woods residential park in parcel BG1 effectively means that this parcel forms part of the settlement of Burton Green, compromising the openness of the Green Belt within the parcel and representing an urbanising influence which has encroached upon the countryside.

- 4.28 Finally, despite containing no built development, parcel LL2 to the south of Long Lawford in Rugby is considered to make a less significant contribution to the Green Belt purposes. This is primarily due to the development that has occurred along Coventry Road immediately to the east and west of the parcel, limiting the role that the land within the parcel plays in inhibiting ribbon development and maintaining the gap between Rugby and Long Lawford. Furthermore, Coventry Road is a relatively significant boundary in relation to the parcel due to its proximity to the existing urban edge of Long Lawford and there is no intervisibility with the historic core of Rugby to the east.



Joint Green Belt Study

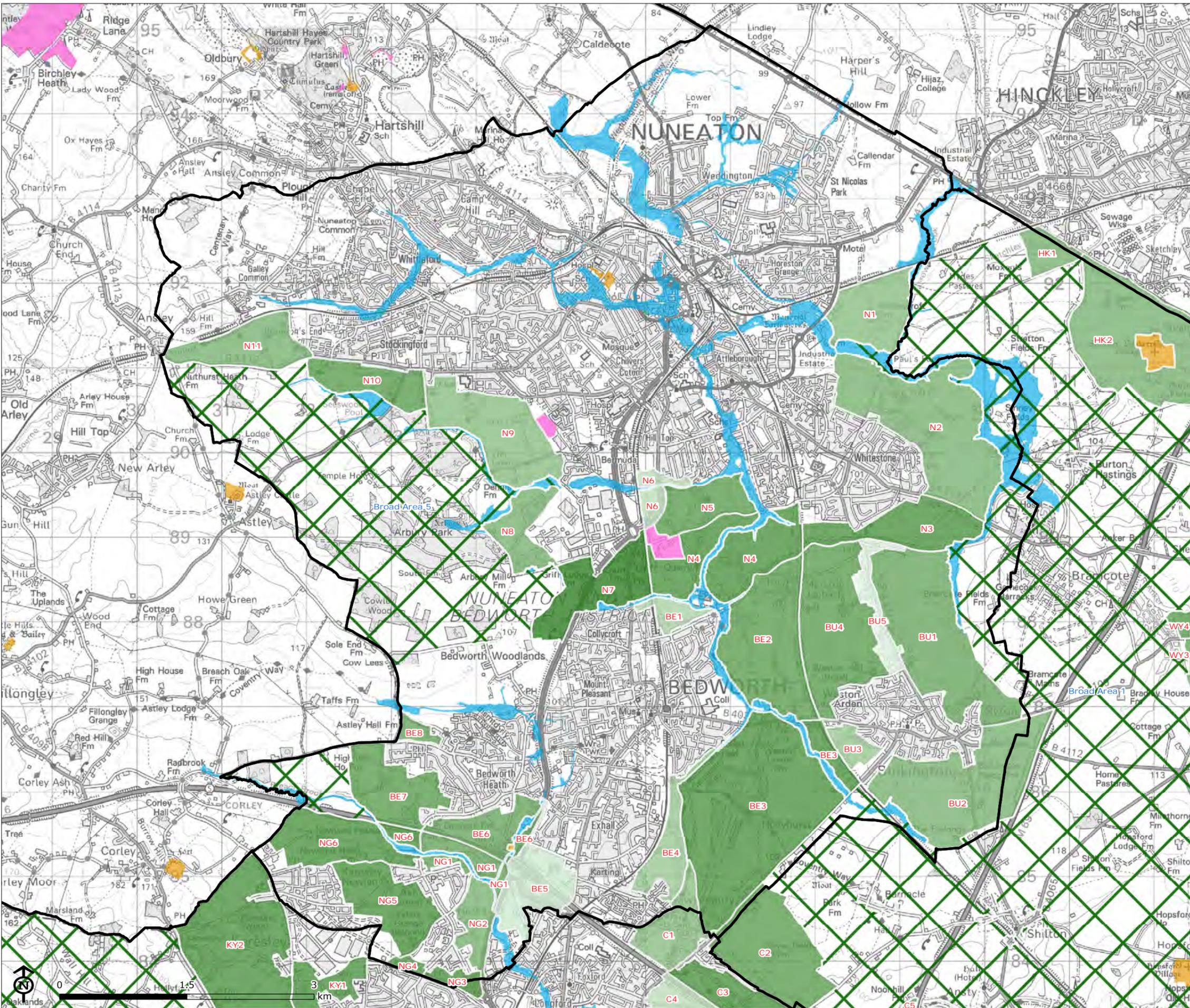
Figure 3
Overall Assessment Findings - Coventry

- District Boundary
- Overall Performance Against Green Belt Purposes**
- High: 20
- 16
- 12
- 8
- Low: 4
- Broad Area
- SSSI
- Scheduled Monument
- Flood Zone 3b

Map Scale @ A3: 1:44,000

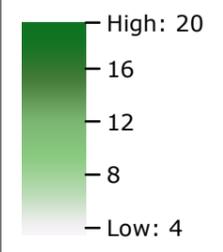


Figure 4
Overall Assessment Findings -
Nuneaton and Bedworth



▭ District Boundary

Overall Performance Against
Green Belt Purposes



⊠ Broad Area

■ SSSI

■ Scheduled Monument

■ Flood Zone 3b

Map Scale @ A3: 1:44,000

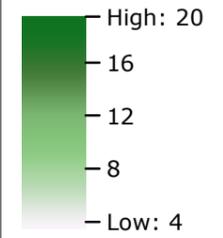


Figure 5

Overall Assessment Findings - Rugby

▭ District Boundary

Overall Performance Against Green Belt Purposes

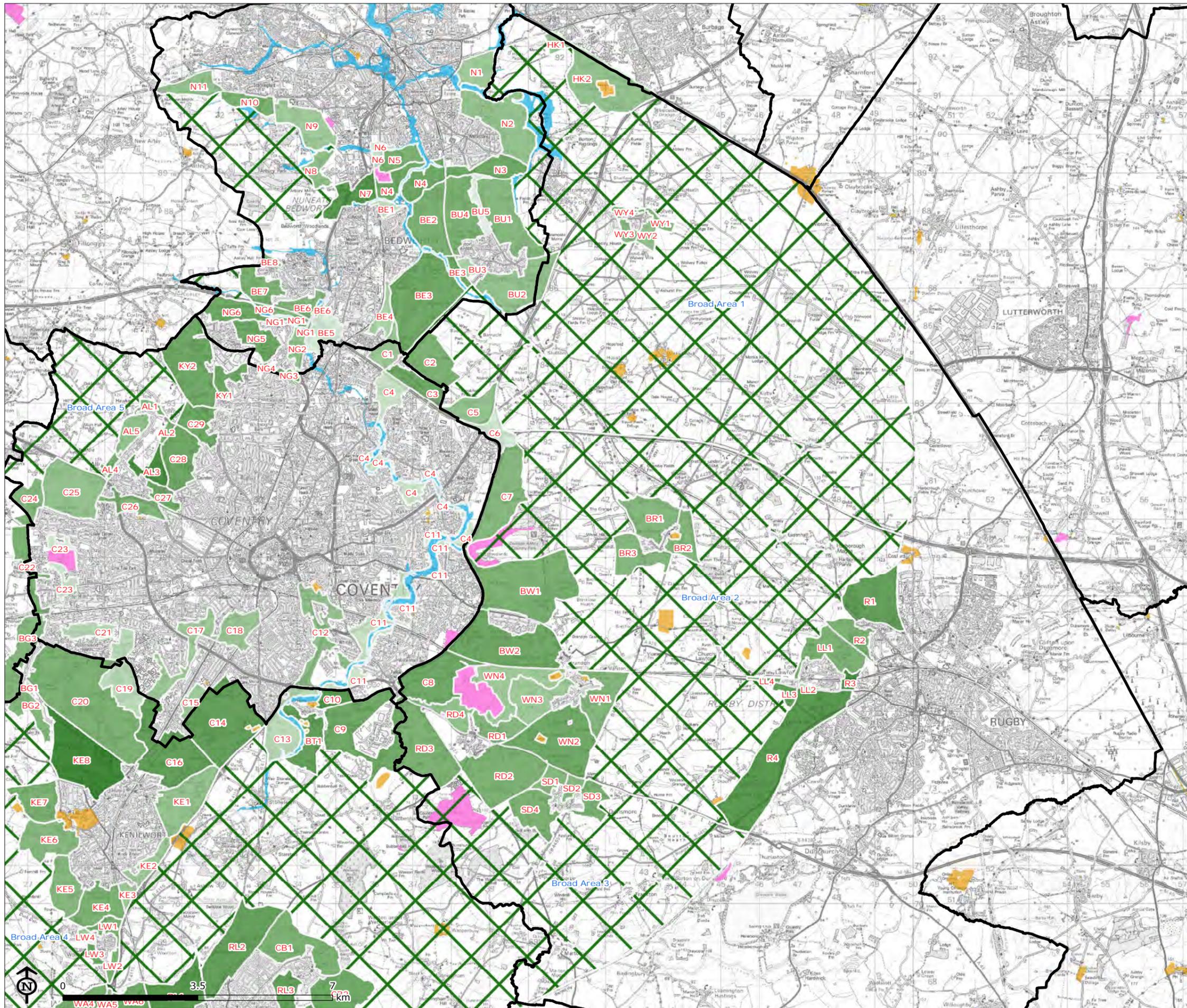


⊠ Broad Area

■ SSSI

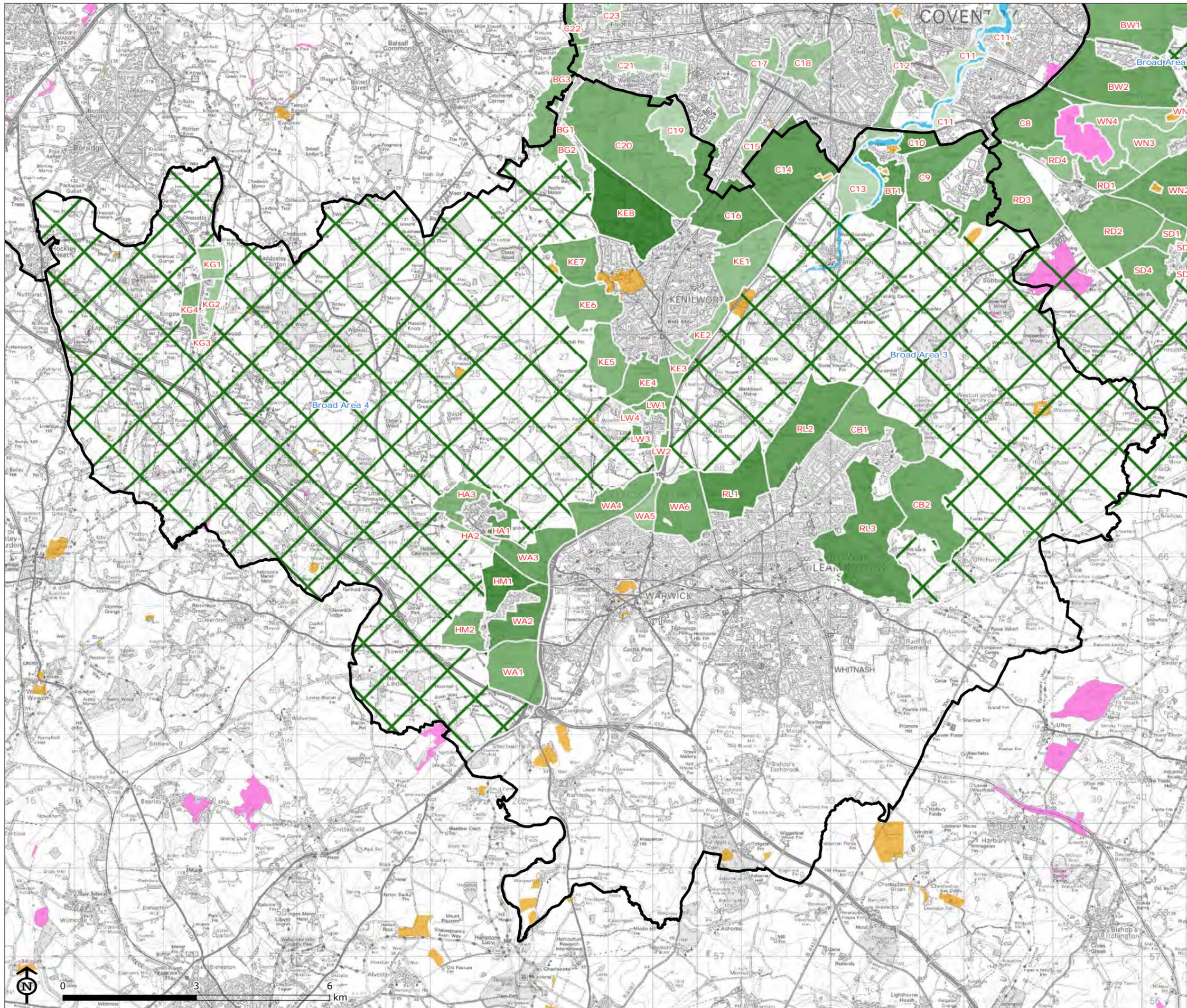
■ Scheduled Monument

■ Flood Zone 3b



Map Scale @ A3: 1:97,000





Joint Green Belt Study

Figure 6
Overall Assessment Findings - Warwick

District Boundary
 Broad Area
 SSSI
 Scheduled Monument
 Flood Zone 3b

Overall Performance Against Green Belt Purposes

High: 20
 16
 12
 8
 Low: 4

Map Scale @ A3: 1:84,000



5 Conclusions and next steps

- 5.1 This final chapter draws overall conclusions from the study and suggests some next steps, in terms of how the Stage 1 authorities might use the findings in their respective Local Plan preparation.

Overall performance of the Green Belt

- 5.2 This Stage 1 study has demonstrated that the majority of the Green Belt in Coventry, Nuneaton and Bedworth, Rugby and Warwick continues to serve its purposes very well. In particular it helps to maintain the identity of this part of the West Midlands and to provide opportunities for residents to enjoy the countryside close at hand.
- 5.3 As set out in Chapter 4, there are variations in the contribution that different parts of the Green Belt make to the purposes 1, 2, 3 and 4. In terms of purpose 5 (encouraging the recycling of urban land), it can be concluded that the entire Green Belt has helped to meet this purpose historically and will continue to do so, noting that there remain some significant areas of previously used land in the urban areas.
- 5.4 There are also areas of non-Green Belt land within the Stage 1 study area which may or may not be appropriate for development. These include:
- Land at the eastern edge of Coventry and the A46 to the west of parcel C7. Investigations in to their potential should be made before any revisions are made to the Green Belt boundary.
 - Land to the west of Bedworth south of Bedworth Lane containing Bedworth Woodlands.
 - Land to the south of, east and north of Rugby.
 - Land to the south of Warwick and Leamington.

Making changes to the Green Belt

Helping to meet development requirements

- 5.5 As noted in Chapter 2, the NPPF requires changes to the Green Belt to be made through the Local Plan process. This should include:
- i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
 - ii. consideration of the need to promote sustainable patterns of development, considering a range local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.
- 5.6 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes¹⁶.

¹⁶ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisory Service (PAS), 2015: <http://www.pas.gov.uk/documents/332612/1099309/Planning+on+Your+Doorstep+-+The+Big+Issues+Green+Belt.pdf/bb5fcd90-fa29-42a0-9dd9-82b27a43f72f>

- 5.7 In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.
- 5.8 We therefore recommend that the Stage 1 authorities continue to cooperate in considering points i) and ii) above as part of their respective Local Plan preparation processes. Subject to this, we recommend that the lowest performing parcels of Green Belt, or parts of them, could be considered for removal from the Green Belt. These are:
- BU5 in Nuneaton and Bedworth and BG1 and C19 in Warwick have already been developed limiting the benefit of retaining them as Green Belt.
 - BU3, BE1, BE4, BE5 and N6 in Nuneaton and Bedworth, C6 and LL2 in Rugby, KG3 in Warwick are all retained by significant boundaries.
- 5.9 Development in these locations would effectively be 'infill' and would be well contained by existing significant features and the landscape. In defining precise areas for removal, however, the local authorities should seek to minimise any harm to the remainder of the Green Belt by indicating the type of development (in terms of height and density) that would be acceptable in these location.

Safeguarded land

- 5.10 As suggested in paragraph 85 of the NPPF, the Stage 1 authorities may also wish to consider the need for 'safeguarded land'. This is land taken out of the Green Belt in this plan period for potential development in the next plan period and protected from development proposals arising in the meantime by policies with similar force to Green Belt.

Designation of Local Green Space

- 5.11 Much of the Green Belt within and close to the edge of the sub-region's urban areas plays an important role as 'green infrastructure'. This is particularly relevant in the pockets and corridors of Green Belt within Coventry (parcels C4, C11, C12, C17, C18, C21, C23 and C26), which not only make the City a better place to live, but also increases the sustainability of the City, promoting health and wellbeing, biodiversity and resilience to climate change. As noted in chapter 4, despite their positive uses, these pockets and corridors of Green Belt have little connection with the wider countryside around Coventry and, partly as a result, make a more limited contribution to the Green Belt purposes.
- 5.12 We therefore recommend that the City Council should consider the re-designation of these areas as 'Local Green Spaces'. The NPPF (para. 77) supports such an approach, although not specifically in relation to Green Belt land. Local Green Spaces are described as land of particular '*beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife*' (NPPF para. 77). This describes these parcels very well and, through any appropriate Local Plan policy framework, their protection could be secured as strongly as Green Belt.