



Green Belt and Green Environment

Background Paper

November 2024



Contents

1 Introduction	2
2 Green Belt and Local Green Space Policies	2
National Policy (2021 NPPF) Green Belt	2
National Policy (2021 NPPF) Local Green Space	3
Review of Policy GB1 Green Belt and Local Green Space	4
Review of Policy GB2: Safeguarded Land in the Green Belt.....	6
3 Green Environment Policies.....	7
Review of Policy GE1 Green Infrastructure	7
Review of Policy GE2: Green Space	9
Review of Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation	9
Review of Policy GE4: Tree Protection	10

1 Introduction

This Background Paper focuses upon the review of the policies contained in the Green Belt and Green Environment chapter of the adopted Local Plan. There are a number of key themes in this chapter: Green Belt, Local Green Space, Safeguarded Land, Green Infrastructure, Biodiversity (with geological, landscape and archaeological conservation), and Tree Protection.

Each of these themes is taken in turn, setting out the national policy context, the Issues and Options (Regulation 18) consultation, the responses to the consultation and how these have been addressed – along with any new evidence – to shape the Regulation 19 Plan and its reviewed policies.

2 Green Belt and Local Green Space Policies

National Policy (2021 NPPF) Green Belt

When the Issues and Options consultation was undertaken, the NPPF set out five purposes of Green Belt in paragraph 138:

- 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.*

Paragraphs 140 and 141 stated:

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

In terms of defining Green Belt boundaries, the NPPF (2021) stated in paragraph 143 that plans should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

National Policy (2021 NPPF) Local Green Space

Local Green Space was a separate policy designation within NPPF Chapter 8, Promoting Health and Safe Local Communities. Paragraph 101 stated:

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

Paragraph 102 set out:

The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land*

Paragraph 103 stated:

Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

Review of Policy GB1 Green Belt and Local Green Space

GB1: Issues and Options

Adopted Local Plan policy GB1 covered both Green Belt and Local Green Space. The Regulation 18 (Issues and Options Consultation) sought general comments on the policy, and also sought to seek peoples' views on whether or not Green Belt and Local Green Space should be split into two separate policies to better reflect the NPPF.

In terms of general comments about Policy GB1 the majority of these were calling for all of Coundon Wedge to be Green Belt and objecting to development at Browns Lane. Other comments related to protecting Green Belt, providing the right infrastructure to support development, using Natural England's Accessible Greenspace Standards, the policy should reference how blue infrastructure and sites should be managed for community benefit. A number of representors referred to sites they were promoting.

In terms of the question regarding whether the policy should be split into two separate policies (Green Belt and Local Green Space) the majority of respondents agreed that separate policies would be preferred. Some commented more generally about needing to protect Green Belt, suggesting that the public should be able to propose Local Green Space sites, and that a strategic approach is needed.

In terms of the Council response to the representations, many comments were beyond the scope of the Local Plan review as they related to a live planning application at Browns Lane and were therefore considered through the Development Management process. Representations promoting particular sites have been considered through the site assessment process (see the Housing and Employment Land Availability Assessment (HELAA) 2024 for details). Having considered the representations the Council remains of the view that Policy GB1 should be split into two separate policies to reflect the national policy position.

Updated evidence to inform the review of Policy GB1

The version of the NPPF which informed the Issues and Options consultation was the 2021 iteration. In December 2023, a revised version of the NPPF was issued by

Government. In terms of Green Belt policy there was a change to paragraph 140 (new paragraph 145) which stated:

Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non- strategic policies, including neighbourhood plans.

Notwithstanding the above change stating that there was no requirement to review Green Belt boundaries, the Council produced a Green Belt Technical Update Study (July 2024) to ensure up to date evidence was available to inform the plan review.

The adopted Local Plan was informed by a sub-regional Green Belt study undertaken across the Coventry, Solihull and Warwickshire Local Planning Authorities, which led to the Council removing some 16% of its Green Belt to accommodate growth needs. The purpose of the Technical Update Study was to gain an understanding of whether anything had changed in terms of Coventry's remaining Green Belt since the original evidence base was produced. The same assessment methodology was utilised for consistency to determine whether any scorings needed to be revised due to contextual changes which have occurred since the plan was adopted.

The Sustainability Appraisal (SA) considered options for development / no development in the Green Belt. This is considered as part of the Growth Needs background paper, which sets out how the Council intends to meet its housing growth needs without needing any Green Belt release. It also sets out why, despite having a shortfall of employment sites it does not consider Green Belt release to be appropriate to contribute to meeting that need. Having no development in the Green Belt only resulted in one potentially negative score (in terms of supporting economic growth), and the option of allowing development in the Green Belt resulted in a potentially negative score for enabling vibrant and inclusive communities, and a strong double-negative score against protecting and enhancing the quality of townscapes and landscapes.

Review of Policy GB1 Conclusions

Further to detailed assessment work which considered how development needs might be accommodated (see Background Paper on Growth Needs, the Housing and Employment Background Papers and the HELAA), no further releases of Green Belt are proposed which would require a revision of GB1.

The only changes to GB1 are therefore proposed to be as follows:

- To split the policy into Green Belt (GB1) and Local Green Space (new policy GB3)
- To ensure policy wording reflects that of national policy
- To remove the list of sites which were listed in GB1: this is not necessary now as the designations were made through the adoption of the 2017 Plan and these are now reflected on the adopted Policies Map. No changes to these designations are proposed through the Local Plan Review.

In terms of future Green Belt policy, at the time of writing this Background Paper the government were proposing to introduce a new designation of Grey Belt which could potentially accommodate new development where a series of tests were met. Notwithstanding this, the principles of 'brownfield first' and making 'effective and efficient use of brownfield' looked set to remain.

Review of Policy GB2: Safeguarded Land in the Green Belt

GB2: Issues and Options

The Issues and Options consultation explained how the National Planning Policy Framework 2021 set out (in paragraph 143) the context for 'safeguarding' land – ie removing it from the Green Belt 'to meet longer-term development needs stretching well beyond the plan period'. In line with Paragraph 143 part d, safeguarding does not allocate the land for development, such an allocation can only be made through the process of plan review, as explained in Policy GB2.

This policy identified a number of sites stating that they will be 'subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District'.

The explanatory text to Policy GB2 stated that the sites in question (Land south of Westwood Heath Road, Land south of Bishop Ullathorne School, Playing Field south of Finham Park School and Land West of Finham Primary School) were safeguarded to ensure flexibility (at that time) to be able to respond to changing circumstances in the Local Plan being developed by Warwick District Council. At the time, they formed part of wider Green Belt parcels which crossed the boundary between Coventry and Warwick District.

Warwick District Local Plan (WDLP) was adopted in September 2017. The implications for the safeguarded land in Coventry was set out in the Issues and Options consultation as follows:

- a) In respect of 'land south of Bishop Ullathorne School', 'playing field south of Finham Park School' and 'land west of Finham Primary School', these all abut land at Kings Hill (Warwick District Local Plan 2011- 2029 allocation H43). The Kings Hill site was allocated in the WDLP for housing and taken out of the Green Belt
- b) In respect of 'land south of Westwood Heath Road' this abuts land that is also safeguarded in the Warwick District Local Plan (policy DS21 – S1 'Land south of Westwood Heath Road'). Any decision on whether to allocate this land within

Warwick District for housing will be made as part of the South Warwickshire Local Plan that is currently in preparation.

In terms of the consultation, responses were varied. Some were promoting their site submissions on the safeguarded sites, some commented more generally that these needed to be developed, that proximity to the university is relevant. It was commented that cross boundary work with Warwick District Council is needed. Some felt that the sites should not be developed and that Green Belt should be protected and some commented that the NPPF says that safeguarded land should be reviewed after the plan period i.e. after 2041.

Updated evidence to inform the review of Policy GB2

No changes to the principles of safeguarded land were made as a result of the 2023 iteration of the NPPF. The South Warwickshire Local Plan is under preparation and at the time of writing Warwick and Stratford on Avon District Councils had undertaken an Issues and Options consultation (January to March 2023), were updating the evidence base and were moving towards a Preferred Options version of the plan.

Review of Policy GB2 Conclusions

The South Warwickshire Local Plan is under preparation and therefore it is considered appropriate to retain the safeguarded land status of these sites through this plan review until the outcomes of the review are known. This means that policy GB2 will need to be reviewed through the next iteration of the Coventry Local Plan, but no changes are considered necessary at the present time.

3 Green Environment Policies

Review of Policy GE1 Green Infrastructure

GE1: Issues and Options

Policy GE1 is a broad strategic policy which bases the assessment of, and provision of Green Infrastructure (GI), on the most up to date version of the Council's Green Space Strategy. Further detail is provided in the Open Space Supplementary Planning Document which was adopted in March 2022. The policy is focused upon ensuring that development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation. The policy supports the provision of GI in helping with adaptation for climate change, flooding, conserving and enhancing the natural environment, and promoting healthy and safe communities.

A number of changes to this policy were proposed through the consultation, including the inclusion of trees, key corridors for enhancement, wildlife friendly buildings, references to health and climate change, targets for tree canopy cover, links to natural capital and ecosystems and baseline data for biodiversity. It was also proposed to strengthen the policy by reference to blue infrastructure (ie water bodies), and updating references to include the Local Nature Recovery Strategy (to

reflect national legislation) and to the work of the West Midlands Combined Authority (WMCA) in terms of GI.

There was a good level of support for the proposals, however, many stated that GE1 was sufficient already, that the issues raised were already covered and that the list of proposed additions was too vague, and targets would be hard to monitor (tree canopy coverage for example). Several comments and suggestions were made in terms of potential standards which could be introduced including canals / blue infrastructure, giving weight to the Local Nature Recovery Strategy.

Additions were also requested in terms of introducing Access to Woodland Standards, delivering it 20% biodiversity net gain (and maintaining units for 50 not 30 years, the latter being the national figure), Natural England's Green Infrastructure Framework, and soil biodiversity. Some concerns were cited over inaccuracies (river Sherbourne is a tributary of the Sowe). Removal of culverts was supported but should also reference flood plain connectivity and natural flood management.

Updated evidence to inform the review of Policy GE1

Since the consultation was undertaken, consideration has been given to policy wording to ensure that it does not duplicate other aspects of the plan as this will become unwieldy and confusing. The 2023 iteration of the NPPF did not make any substantive changes to the 2021 version which would impact on Policy GE1. Biodiversity Net Gain became mandatory but is not addressed in GE1 as it is covered in Policy GE3.

It was agreed that, whilst the policy did already include reference to blue infrastructure, it would be helpful to state this more explicitly, and references to habitats (including new habitats), multi-functional spaces, flooding and nature based solutions have also been strengthened. Further detail could also be included in an updated Biodiversity SPD (see also the review of Policy GE3).

It is important that the policy is able to link to existing and emerging relevant strategies and associated action plans to support their delivery. A refreshed version of the Warwickshire, Coventry and Solihull Green Infrastructure Strategy was produced in August 2024 and this provides the broad subregional context for the production of more localised work. In Coventry the Green Space Strategy is to be replaced by a wider Green and Blue Infrastructure Strategy and work has commenced on this, and therefore this is referenced as a policy hook for when this is finalised. Additionally, work is underway with the WMCA in producing a mandatory Local Nature Recovery Strategy (LNRS) and again, policy GE1 will support delivery of this when this is finalised.

The Sustainability Appraisal considered the strategic options for Nature and Biodiversity policy (also relevant to the other Green Environment policies reviewed thereafter as it considered them as a whole). It considered two options: 1) set planning policy requirements in line with national requirements and 2) set requirements which go beyond national requirements for Biodiversity Net Gain (BNG) and Green Infrastructure. The latter option resulted in stronger positive effects. However, this has to be balanced with viability issues and the delivery of the

plan overall. Neither option resulted in any negative effects, with most scenarios yielding positive impacts due to increased mandated standards nationally. There was no change on this outcome between the Issues and Options SA and the Regulation 19 SA.

Review of Policy GE1 conclusions.

As explained above, policy wording remains broadly NPPF compliant, however, needs updating to reflect the current national legislative position and to provide the relevant hooks to emerging local work on Green and Blue Infrastructure. This will also include action plans and targets (as the scope of this work will reach beyond that covered by the Local Plan).

Review of Policy GE2: Green Space

Policy GE2 is the Council's approach to the proposed loss of Green Space and how this will be assessed through a planning application.

GE2: Issues and Options

The Council suggested through the consultation that the Green Space policy remained up to date and sought comments on this.

In terms of the responses, it was requested that support for flood resilience schemes was added provided these did not impact the primary function of the green space. It was also commented that reference to green space standards does not reflect playing fields as the new playing pitch strategy does not use a standards approach in line with national requirements.

Updated evidence to inform the review of Policy GE2

Since the Issues and Options consultation was launched the Council has produced a new Playing Pitch and Outdoor Sport Strategy (August 2023) therefore the policy needs to reflect this, and the current approach to assessment.

Review of Policy GE2 conclusions

The Council agrees with the proposals to update the policy to reflect national changes to addressing the loss of sports provision, and to ensure support for flood resilience schemes in green spaces where they do not impact its primary function.

Review of Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation

GE3: Issues and Options

Policy GE3 seeks to protect and enhance designated sites and sites of value, requires mitigation where this cannot be achieved and encourages biodiversity especially in areas of deficiency, for example in areas of development and along wildlife corridors.

A number of changes were proposed in the consultation to update this policy in line with the Environment Act 2021 and other, more local considerations.

A number of additions to policy wording were proposed including citing the need for 10% Biodiversity Net Gain, more detail about offsetting, more detail about species preservation, details about enhancement corridors and requiring Natural England's Accessible Natural Green Spaces Standards (ANGSt). It was also suggested that policy should note the importance of green features in the built environment (such as bat and bird boxes), mandate increases in tree coverage, wildlife-friendly buildings and new green spaces, and require the improvement of blue infrastructure.

Comments were sought on these proposals.

Respondents were split equally between those who cited agreement and those who did not. Those objecting felt policy was sufficient and that viability testing would be needed. Those supporting, or offering comment advised that connectivity is essential, that the policy should link to Natural England's Benefits from Nature tool, that policy should link to the Local Nature Recovery strategy and Biodiversity Net Gain plan, should protect trees and should not encourage offsetting on private land. It was commented that any habitat survey river metric should be 10m from the red line boundary (for planning applications) and medieval ridge and furrow should be given more protection.

Conclusions on the review of Policy GE3

Overall, it was considered that the current wording of Policy G3 was still fit for purpose with updating needed to reflect national legislation in relation to Biodiversity Net Gain (BNG) and the Local Nature Recovery Strategy (LNRS). Water Quality standards are addressed in the EM policies of the plan, tree policy is covered in GE4, ANGst standards are addressed in Policy H3 (Housing) and archaeology has its own proposed new policy in the 'heritage' section of the plan. Accordingly it is unnecessary to duplicate policy here. In terms of other recommendations relating to biodiversity it is felt that these could be dealt with via an updated Biodiversity SPD as these could elaborate on Local Plan policy rather than overwhelm a succinct policy which is currently performing effectively.

Review of Policy GE4: Tree Protection

GE4: Issues and Options

A number of changes were proposed in the consultation which it was felt might strengthen policy GE4 including buffer zones (ancient woodland), compensatory measures, reference to trees of 'Tree Preservation Order (TPO) quality', specimen trees and planting specifications.

A range of responses were received, some supported and some objected to the changes and some made more general comments. It was felt that if a tree is of 'TPO quality', it should be TPO'd, that the reference to 'specimen tree' is confusing as there is no such designation and it should not be confused with other designations i.e. ancient woodland and veteran trees. It was considered onerous to require exceptional circumstances to justify loss if the rest of the development is acceptable. The proposals regarding buffer zones and ancient woodland / veteran trees were controversial, one commented that it should be 50m not 30m, and another

referencing Natural England standing advice of 15m. Others sought clarification on what is meant by 'adequate', 'unacceptable loss', 'adequate compensatory provision'. One respondent asked that the policy works in tandem with the BNG metric and the precautionary principle which requires developers to consider tree retention on site.

Conclusions on the review of Policy GE4

Having considered the comments it was considered that some updating to the policy could improve clarity including specific reference to national policy and guidance, and to the Coventry Trees and Development Guidelines SPD (which contains elaboration on policy).