



Old Milverton and Blackdown Green Belt Assessment

Assessment of Land South of Sandy Lane/Old
Milverton Lane and West of Westhill Road

Old Milverton and Blackdown Joint Parish Council

Final report

Prepared by LUC

April 2026

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Contents

Executive Summary

Chapter 1 **7**

Introduction

Report Structure 7

Report Authors 7

Chapter 2 **9**

Context and Policy

The Study Area 9

The Warwickshire Green Belt 12

South Warwickshire Local Plan 14

National Green Belt policy 15

National Green Belt Planning Practice Guidance 17

Previous Green Belt assessments 20

Chapter 3 **21**

Assessment Methodology

General approach 21

Grey belt 33

Fundamental impacts to remaining Green Belt land 33

Chapter 4 **36**

Assessment Findings

Purpose A 38

Purpose B 40

Purpose C 42

Purpose D 44

Purpose E 46

Grey Belt 48

Fundamental impact 48

Appendix A
Parcel Assessments

Executive Summary

LUC was commissioned by Old Milverton and Blackdown Joint Parish Council to undertake an independent assessment of Green Belt land within the parish, focusing on land to the south and south-east of Sandy Lane and Old Milverton Lane and to the south-west of Westhill Road, within Warwick District. The assessment area covers Strategic Growth Option SG06, as identified in the Preferred Options version of the South Warwickshire Local Plan (2023).

The assessment evaluates the contribution of this land to the five Green Belt purposes set out in the National Planning Policy Framework (NPPF, December 2024) and considers whether any parcels could be classified as 'grey belt' in line with the national definition and associated Planning Practice Guidance (PPG) published in February 2025.

The study area comprises predominantly open agricultural land, defined by hedgerows, trees and drainage features. The area lies between Royal Leamington Spa and Kenilworth, adjacent to the hamlet of Blackdown and near Old Milverton, and parts of the area are affected by Flood Zones 2 and 3. A small area also lies adjacent to the Royal Leamington Spa Conservation Area.

Using the February 2025 PPG, LUC applied a consistent, parcel-based methodology to assess variations in contribution to the five Green Belt purposes. Six Green Belt parcels (OMB1–OMB6) were identified within the study area. Each parcel was assessed against all five Green Belt purposes. Contribution levels were rated as strong, moderate or weak, using the illustrative criteria set out in national guidance. The assessment also considered the potential for Green Belt release to fundamentally undermine the integrity of the remaining Green Belt taken as a whole.

The assessment concludes that the study area as a whole performs an important Green Belt function, particularly in relation to Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose C (safeguarding the countryside from encroachment). Parcels OMB1, OMB2, OMB3, OMB5 and OMB6 make a strong contribution to Purpose A because development within them would erode the openness of the Green Belt and be perceived as sprawl from the large built up area

With regard to Purpose B (preventing neighbouring towns from merging), all parcels lie within the wider gap between Royal Leamington Spa and Kenilworth. This gap is considered relatively robust due to landform, tree cover and the River Avon, although road and rail links reduce its overall fragility. No parcel makes a strong contribution to this purpose with contributions ranging from moderate to weak depending on how development would affect visual and physical separation within the wider gap.

Purpose C relates to the encroachment of the countryside. With the exception of Parcel OMB4, all parcels play a strong role in relation to preventing encroachment on the countryside. Furthermore, as most of the parcels lack features that would restrict and contain, and urbanising influence, the performance matches that of Purpose A - where development in one parcel would likely impact an adjacent parcel resulting in further encroachment into the countryside.

In relation to Purpose D (preserving the setting and special character of historic towns), the assessment concludes that, while Royal Leamington Spa is a historic town, the parcels within the study area have limited visual, physical or experiential connections to its historic core. Vegetation, modern development and the location of conservation areas mean that none of the parcels make more than a weak contribution to this purpose.

Under the NPPF definition, land cannot be considered grey belt where it makes a strong contribution to any of Purposes A, B or D. On this basis, five of the six parcels are assessed as not being grey belt. Only parcel OMB4, which shows moderate or weak contributions across Purposes A, B and D and is relatively contained by existing development and infrastructure, is provisionally identified as grey belt, subject to further consideration of footnote 7 constraints and detailed development proposals.

The assessment also considers whether the release or development of land within the study area would fundamentally undermine the ability of the remaining Green Belt to serve its purposes. It concludes that, in isolation, development within this area is unlikely to fundamentally undermine the Green Belt's overall function, given the continuing presence of extensive surrounding Green Belt land. However, the report emphasises that this judgement is sensitive to scale, location, cumulative impacts and the distribution of any Green Belt releases across the wider South Warwickshire plan area. A definitive conclusion on fundamental impacts can therefore only be reached through the Local Plan process and a comprehensive, plan-wide assessment of the cumulative impact of release (ie of multiple development allocations) on the Green Belt.

Chapter 1

Introduction

1.1 LUC was commissioned by Old Milverton and Blackdown Joint Parish Council to undertake an independent assessment of Green Belt land within the parish. The study area comprises Green Belt land located to the south and south-east of Sandy Lane and Old Milverton Lane, and to the south-west of Westhill Road. The area falls within the administrative boundary of Warwick District Council. The assessment area covers Strategic Growth Option SG06, as identified in the Preferred Options version of the South Warwickshire Local Plan (2023).

1.2 This assessment evaluates the performance of the Green Belt against the purposes set out in paragraph 147 of the National Planning Policy Framework (December 2024) (“NPPF”).

1.3 The 2024 NPPF also introduced the concept of ‘grey belt’. National Planning Practice Guidance (PPG) on the assessment of Green Belt land to identify grey belt was published in February 2025. The assessment draws on that guidance to determine whether any land within the study area could be classified as grey belt.

Report Structure

1.4 This report sets out the relevant context, methodology and findings of the assessment. The remainder of the report is structured as follows:

- Chapter 2 sets out the site assessment context, including a description of the Green Belt, the site and national and local Green Belt policy and guidance;
- Chapter 3 outlines the methodology that was used to undertake the assessment;
- Chapter 4 sets out the assessment findings.

Report Authors

1.5 LUC is an award-winning environmental consultancy providing planning, impact assessment, landscape design, ecology and digital design services to the public and private sector clients. LUC are leading experts in Green Belt planning for authorities, developers and communities, covering Green Belt performance and grey belt

assessment. LUC have worked for over 60 local authorities on Green Belt studies over the past 10 years, assessing over a third of all Green Belt land in England.

Chapter 2

Context and Policy

The Study Area

2.1 The study area is located to the north-west of Royal Leamington Spa and is enclosed by Sandy Lane and Old Milverton Lane to the north-west and Westhill Road to the north-east. A railway delineates the western extent of the study area.

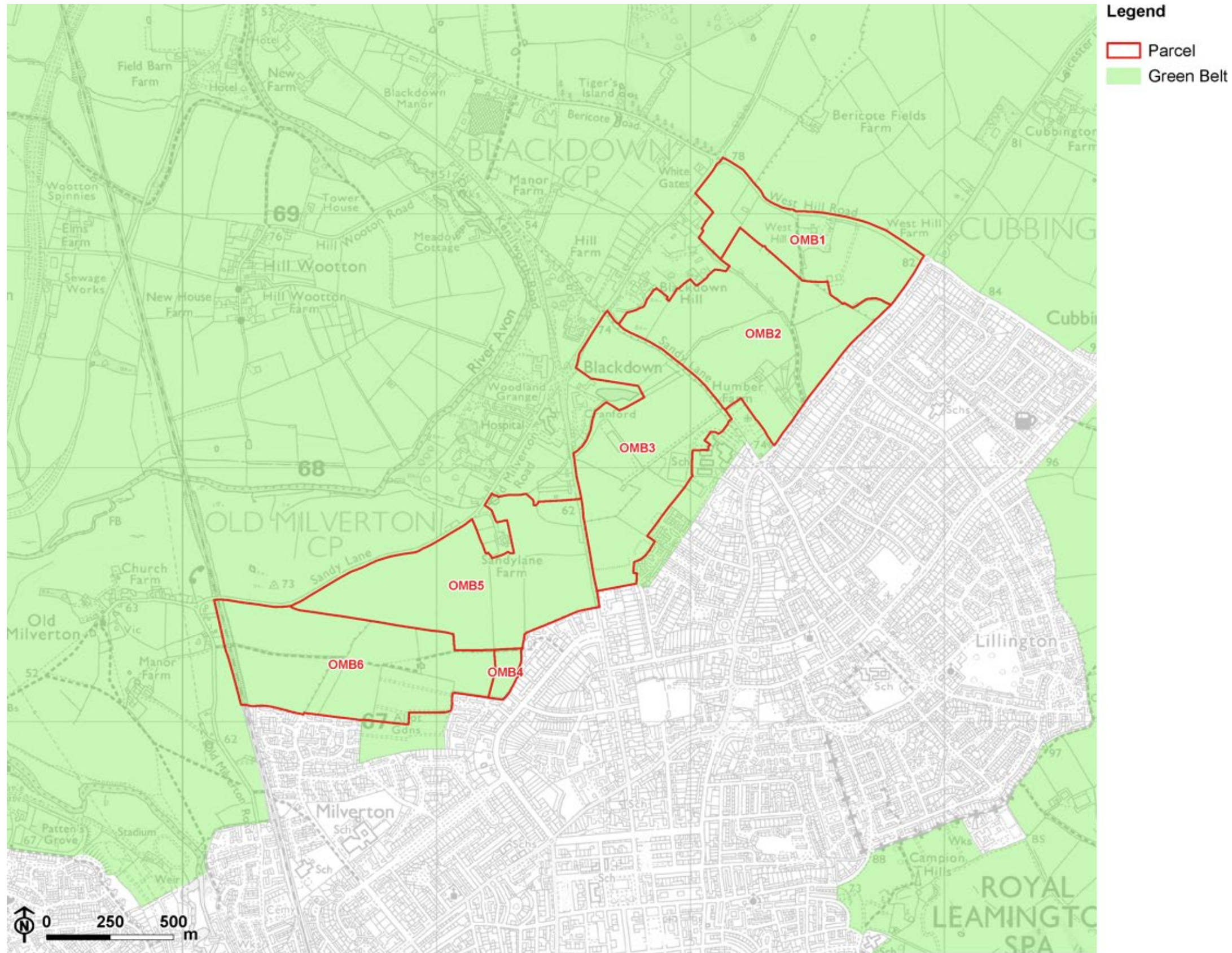
2.2 The hamlet of Blackdown adjoins the parcel to the north-west and has a linear settlement form, extending along both sides of Old Milverton Lane. The settlement of Old Milverton lies to the west of the study area, beyond the railway line.

2.3 The areas largely comprises a network of open, undeveloped land in agricultural use, with fields delineated by hedgerows, trees, and drainage ditches. There are also a number of individual residential dwellings within the study area. The town of Kenilworth lies to the north-west of Royal Leamington Spa and Blackdown.

2.4 Parts of the study area overlap with areas within Flood Zones 2 and 3. A very small area of the Royal Leamington Spa Conservation Area also overlaps with the Green Belt.

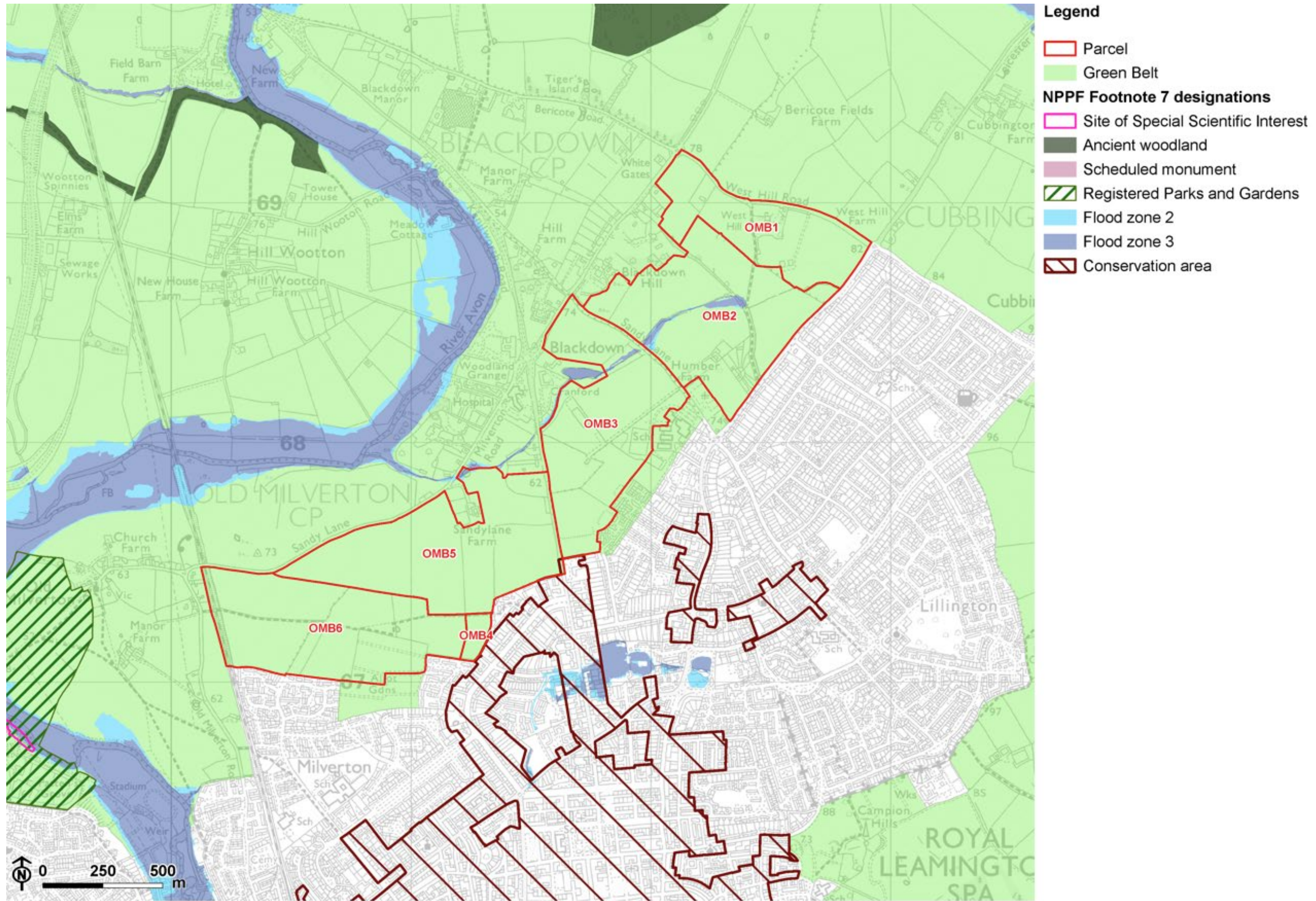
2.5 Figure 2.1 illustrates the six Green Belt parcels that have been assessed within the study area. Figure 2.2 shows the designations which could potentially represent a constraint to development (as listed in footnote 7 of the NPPF).

Figure 2.1: Study Area Extent and Parcels



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Figure 2.2: Study Area and Footnote 7 Designations



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The Warwickshire Green Belt

2.6 In 1955 the Government established (through Circular 42/55) the first clear policy on the need for Green Belts in areas outside of London. The Green Belt within Warwickshire is part of the larger West Midlands Green Belt. From this original Governmental statement, there was uncertainty over the exact extent of the areas to be defined. Although local authorities put forward proposals for a West Midlands Metropolitan Green Belt in 1955, it was not formally approved by the Secretary of State until 1975.

2.7 The Warwickshire Green Belt collectively refers to the Green Belt within the Local Planning Authorities east/south-east of Birmingham (excluding Coventry) comprising: North Warwickshire, Nuneaton and Bedworth, Rugby, Warwick and Stratford-upon-Avon.

2.8 Generally, the West Midlands Green Belt has prevented the sprawl of Birmingham, Wolverhampton and Coventry, merging of surrounding towns and encroachment into the countryside. The Green Belt within Warwick itself (relevant to the study area) was adopted as part of the Warwickshire Structure Plan.

2.9 The Green Belt within Warwick adjoins Coventry to the north and extends to the urban edge of Warwick, Royal Leamington Spa and Whitnash to the south. Kenilworth is an inset settlement in the Green Belt along with other smaller settlements of Leek Wootton, Hatton Park, Budbrooke, Burton Green, Baginton. There is a sub-regional employment site adjacent to Coventry airport which is also inset from the Green Belt.

2.10 The Green Belt in Warwick in 2011 comprised 20,550ha of land and by 2025 this had reduced to 19,060ha (a 7.25% reduction) [\[See reference 1\]](#).

Local Green Belt Policy

2.11 The Warwick District Local Plan was adopted in 2017 and updated in 2021. The plan includes multiple policies relevant to the Green Belt, however these largely apply to individual development considerations, with Green Belt policy largely aligning with National Policy:

- DS19 Green Belt: *'The extent of the green belt is defined on the Policies Map. The Council will apply national planning policy to proposals within the Green Belt'*.
- EC1 Directing new employment development: *'...In the green belt proposals will be determined in line with national policy and policies MS1 and MS2'*.

- EC2 Farm Diversification: *'...In the green belt proposals will be permitted in line with national policy'*.

2.12 Notwithstanding, the Local Plan provides more detailed policies in relation to certain types of development:

- H11 Limited Village Infill Housing Development in the Green Belt: *'Limited village infill housing development in the green belt will be permitted where the site is located within a Limited Infill Village (as shown on the Policies Map) and the following criteria are satisfied: a) the development is for no more than two dwellings; b) the development comprises the infilling of a small gap fronting the public highway between an otherwise largely uninterrupted built up frontage, which is viable as part of the street scene; and c) the site does not form an important part of the integrity of the village, the loss of which would have a harmful impact upon the local character and distinctiveness of the area'*.
- H14 Extensions to Dwellings in the Open Countryside: *'Extensions to dwellings in the open countryside will be permitted unless they result in disproportionate additions to the original dwelling (excluding any detached buildings), which: - a) do not respect the character of the original dwellings by retaining its visual dominance; b) do not retain the openness of the rural area by significantly extending the visual impression of built development; or c) substantially alter the scale, design and character of the original dwelling'*.
- HS5 Directing Open Space, Sport and Recreation Facilities: *'...The Council considers the Green belt an appropriate location for the provision of outdoor sport and outdoor recreation as long as it preserves the openness of the green belt and does not conflict with the purposes of including land within it'*.
- MS2 Major Sites in the Green Belt: *'Due to the importance of the former Honiley Airfield and Stoneleigh Park to the economy and the district, there may be very special circumstances to justify further development in addition to that already identified within existing masterplans (within the boundary identified on the Policies Map). In order to ensure that development proposals are appropriate the Council will support the preparation of masterplans, planning applications or development briefs for the former Honiley Airfield and Stoneleigh Park, which demonstrate that the sites continue to contribute to the openness and the purposes for including the land in the green belt, and which comply with other relevant policies in this Plan. 62 In the case of Stoneleigh Park, appropriate amendments as a result of HS2 will be supported without the need to revise the masterplan. If, as a result of the impact of HS2, development is demonstrably required in the green belt, "very special circumstances" may exist. The range of potentially acceptable uses for development of the Park (within the boundary identified on the Policies Map) will be restricted to those associated with rural*

innovation and equine activities and appropriate ancillary uses. In the case of the former Honiley Airfield the range of uses on the site will be restricted to the automotive and motorsport industries and employment associated with these sectors’.

2.13 Whilst the above policies pertain to individual development decisions, the overall role of the Green Belt in the Spatial Strategy (DS4 Spatial Strategy) was set out. Explicitly DS4 states that, when allocating sites in the Green Belt, the following will be taken into account when considering whether exceptional circumstances for the release of Green belt exist:

- i. The availability of alternative suitable sites outside the Green Belt;*
- ii. The potential of the site to meet specific housing or employment needs that cannot be met elsewhere;*
- iii. The potential of the site to support regeneration within deprived areas; and*
- iv. The potential of the site to provide support to facilities and services in rural area.*

2.14 The Inspector’s report for the 2017 Local Plan [\[See reference 2\]](#) concluded that it was not appropriate or necessary to allocate housing sites on land in the Green Belt around the areas of Leamington Spa, Warwick and Whitnash owing to the significant scale of (then) committed and proposed housing sites within these urban areas.

South Warwickshire Local Plan

2.15 Warwick District Council and Stratford-upon-Avon are currently preparing a joint local plan covering both neighbouring areas – South Warwickshire Local Plan (SWLP). On 10th January 2025, a Regulation 18 (Preferred Options) consultation was undertaken. This included Draft Policy Direction 7 - Green Belt which stated that the SWLP will apply national planning policy in relation to proposals within the Green Belt. It also stated that the SWLP will take a sequential approach to allocating strategic areas of growth and new settlements with further evidence in relation to the relative sustainability of potential growth areas.

National Green Belt policy

2.16 Government policy on the Green Belt is set out in Chapter 13 of the adopted National Planning Policy Framework (NPPF) 'Protecting Green Belt Land'.

Aims and purposes

2.17 Paragraph 142 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'.

2.18 This is elaborated in NPPF paragraph 143, which states that Green Belts serve five purposes, as set out below.

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

Exceptional circumstances

2.19 The NPPF paragraph 145 states: '*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.*'

2.20 Paragraph 146 goes on to state that '*where an authority cannot meet its identified need for homes, commercial or other development through other means...authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.*'

2.21 Paragraph 147 states that authorities must examine fully all other reasonable options for meeting its identified need for development before exceptional circumstances can be demonstrated. Notable reasonable alternatives include:

- making as much use as possible of suitable brownfield sites and underutilised land;
- optimise 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
- discuss with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.22 Paragraph 148 notes that *“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.”*

Grey Belt

2.23 ‘Grey belt’ is defined in Annex 2 of the NPPF as ‘land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.’

Green belt boundaries

2.24 Paragraph 149 states that when defining Green Belt boundaries, plans should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period; and,
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Consultation on Revised NPPF (2025)

2.25 In December 2025, the Ministry of Housing, Communities and Local Government (MHCLG) published a wide range of proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. A consultation on these reforms was undertaken until the 10th March 2026. MHCLG are now considering the consultation responses and will publish a revised version of the NPPF later in the year.

National Green Belt Planning Practice Guidance

2.26 The NPPF's Green Belt policies are supplemented by Planning Practice Guidance (PPG, February 2025) [See reference 3] on Green Belt planning and how to assess Green Belt land, which is particularly relevant to the methodology of this study.

2.27 The PPG sets out:

- the key steps in a Green Belt assessment, including:
 - defining the location and scale of the assessment area;
 - evaluating contribution to the Green Belt purposes;
 - considering areas and assets lists in NPPF footnote 7;
 - identifying grey belt land; and
 - determining if proposals would fundamentally undermine the five Green Belt purposes (taken together) of remaining Green Belt in the plan area.
- key considerations in assessing the contribution Green Belt land makes to Green Belt purposes A, B and D when identifying grey belt land;
- what release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;
- how to determine proposals on potential grey belt land;
- guidance on identifying sustainable locations in the Green Belt;
- golden rules for housing development including, how major housing development should contribute to accessible green space; and,
- how to consider the potential impact of development on the openness of the Green Belt.

Assessing Green Belt land to identify grey belt land

2.28 Authorities must identify grey belt land as part of the necessary review and alteration of Green Belt boundaries in order to:

- sustainably prioritise it over other Green Belt locations through the plan-making process; and
- help determine planning applications on Green Belt land in line with paragraph 155.

2.29 The guidance is clear that *‘where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt, or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the area’s adopted Plan and the NPPF’* (PPG Paragraph: 001 Reference ID: 64-001-20250225), including whether:

- development is sustainably located;
- whether it would meet the ‘Golden Rules’ contribution (where applicable); and
- whether there is a demonstrable unmet need for the type of development proposed.

Grey Belt assessment criteria

2.30 The PPG sets out illustrative criteria that should be considered when assessing the contribution of land to Green Belt Purposes A, B and D. These are set out in Chapter 3 (PPG Paragraph: 005 Reference ID: 64-005-20250225).

Applying NPPF footnote 7 to the definition of Grey belt land

2.31 Grey belt land cannot be defined on Green Belt land covered by or affecting other NPPF footnote designations where that designation ‘would provide a strong reason for refusing and restricting development’. In such locations, it may be necessary to only ‘provisionally identify such land as grey belt in advance of more detailed specific proposals’ (PPG Paragraph: 006 Reference ID: 64-006-20250225).

Assessing the impact of Green Belt release or development on the remaining Green Belt in the Plan area

2.32 The PPG states that a Green Belt assessment should not be limited to the impact of release or development of grey belt land but any Green Belt land, and requires consideration of fundamental impact to all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole.

2.33 Such Green Belt locations should only be discounted for release or development where they would 'affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way' (PPG Paragraph: 008 Reference ID: 64-008-20250225).

Identifying sustainable locations in a Green Belt

2.34 Whether reviewing Green Belt boundaries or determining applications for development in the Green Belt, the need to promote sustainable patterns of development should determine whether a site's location would be appropriate for the kind of development proposed. Consequently, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.

2.35 The sustainability of specific locations should be determined in light of local context and site or development-specific considerations; however, authorities should seek to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.

Harm of not inappropriate development to the Green Belt and its openness

2.36 If development is on previously developed land (PDL) or grey belt and is not inappropriate development, substantial weight does not need to be given to any harm to the Green Belt, including to its openness [[See reference 4](#)]. This is justified by the definition of the land as PDL or grey belt, having already considered its impacts on openness or to Green Belt purposes.

Previous Green Belt assessments

Coventry and Warwickshire Joint Green Belt Study Stage 1

2.37 LUC carried out an assessment of the whole of the Warwickshire Belt in 2015 [See reference 5]. This assessed the contribution of defined parcels of land to the Green Belt purposes. The Stage 1 study pertained to the assessment of the Green Belt within Coventry City, Nuneaton and Bedworth Borough, Rugby Borough and Warwick District.

2.38 A number of parcels (RL1 and RL2) are sited to the north-west of Royal Leamington Spa and comprise part of the study area of this assessment. These parcels overlap with the totality of the study area however, RL1 includes the settlement of Blackdown itself and RL2 includes areas further north-east.

2.39 The assessment used a different approach to that used in more recent Green Belt studies, assessing Purpose A (then termed Purpose 1) in two parts and rating its contribution numerically. Any parcel containing no or very limited ribbon development was rated strong for Purpose 1a, whilst Purpose 1b was rated on the basis of potential for sprawl to occur – so in the case of RL1 it was considered the parcel played some role in preventing ribbon development along the eastern edge of Kenilworth Road, and that the openness of the parcel (‘the northern corner’) had been compromised (by the settlement of Blackdown itself). Contribution to Purpose B, scored highly on the basis the parcel played a role in preventing Old Milverton from merging with Royal Leamington Spa (under the current PPG Old Milverton would not be considered a town). Purpose C did not score highly owing to existing development and ineffective boundaries to prevent encroachment. The parcel scored highly for Purpose D on the basis it borders the Leamington Spa Conservation and part of the parcel has intervisibility with the historic core.

2.40 RL2 scored highly for Purpose A by preventing ribbon development along roads leading out of Cubbington and Leamington Spa. The parcel scored highly for Purpose B owing to a small gap between the parcel and Blackdown (the latter would not be considered a town under the current PPG). The parcel had moderate scoring for Purposes C and D.

Coventry and Warwickshire Joint Green Belt Study Stage 2

2.41 LUC also carried out the stage 2 assessments in 2016 [See reference 6]. It used the same assessment methodology as the Stage 1 document but with a focus on North Warwickshire Borough and Stratford-upon-Avon.

Chapter 3

Assessment Methodology

3.1 This chapter outlines the methodology used to undertake the assessment of the site's contribution to the Green Belt with reference to key planning policy, practice guidance and case law. The February 2025 PPG (outlined above in Chapter 2) is particularly relevant to the method.

General approach

The location and scale of assessment areas

3.2 The PPG states that local planning authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes. The approach that LUC is currently using for all our Green Belt studies, is to adopt a minimum parcel size for the identification of variations in contribution to the NPPF purposes and to apply this across the study area. For the purpose of this assessment, a minimum parcel size of 1 ha was used.

Parcelling approach

3.3 LUC's approach to parcelling, does not predefine parcels but instead uses an analysis process to identify variations in contribution to the purposes, with areas being defined to reflect those variations. The defined areas are a final product of the assessment, reflecting the range of variations in Green Belt contribution to the Green Belt purposes within the study area.

3.4 Parcel boundaries typically follow readily recognisable physical features, including natural features such as waterways and water bodies, woodlands and topographical features, and manmade features such as roads and railway lines and field boundaries where possible. This is an approach that LUC has successfully used in all its recent Green Belt assessments and has been considered robust by inspectors at Local Plan Examinations.

Assessing all the purposes

3.5 Whilst the contribution to Purposes C and E are not relevant to the identification of grey belt, Purpose C in particular is still an important consideration in Green Belt planning decisions, particularly in scenarios involving the release of Green Belt land that is not defined as grey belt land. Purposes C and E have therefore been assessed in the study.

3.6 'Strong' contribution ratings, where applicable to Purposes A, B or D, identify land which does not meet the definition of grey belt (given that land which contributes strongly to Purpose C and/or E can still meet the definition of grey belt land).

Rating scale

3.7 The PPG is not prescriptive in terms of the definition of rating scales but, for the purposes of identifying grey belt land, it provides illustrative examples of features which would characterise 'strong', 'moderate' and 'weak/no' levels of contribution to the relevant Green Belt purposes (A, B and D). To minimise complexity, the assessment of Green Belt land within this assessment follows the same rating scale referenced in the PPG.

NPPF footnote 7 areas and assets

3.8 The Government's definition of grey belt land 'excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.' The PPG states in such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225).

3.9 Footnote 7 states 'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitat sites **[See reference 7]** (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets **[See reference 8]** (and other heritage assets of archaeological interest referred to in footnote 75 **[See reference 9]**); and areas at risk of flooding or coastal change.'

3.10 Figure 2.2 shows the known designations of relevance within the study which includes Flood Zones 2 and 3 which fall within the assessment parcels. These areas have not been excluded from the assessment but Green Belt land that does not

contribute strongly to Green Belt purposes A, B and D and overlaps with these footnote 7 areas and assets should only be ‘provisionally’ identified as grey belt land (if relevant).

3.11 The Footnote 7 data available for the purpose of this study has been limited to nationally available datasets only.

Assessment criteria

3.12 The following assessment criteria were used to assess the performance of land to the national Green Belt purposes, in line with the latest national planning policy and practice guidance (including the illustrative criteria set out in the PPG).

Purpose A – to check the unrestricted sprawl of large built-up areas

Grey belt PPG for Purpose A

Table 1.1 Assessment criteria for Purpose A

Rating	Assessment criteria
Strong	<p>The following features in combination are identified as being illustrative of a ‘strong’ contribution:</p> <ul style="list-style-type: none"> ■ Absence of existing development. ■ ‘Near to’ a large built-up area. ■ Lack physical features in reasonable proximity that could restrict and contain development. ■ A location which, if developed, would form an incongruous pattern in relation to a large built-up area.
Moderate	<p>The presence of one or more of the following features, in addition to being near to a large built-up area, is identified as being illustrative of a moderate ‘contribution to Purpose A:</p> <ul style="list-style-type: none"> ■ Presence of, or containment by, development such that any new development would not result in an incongruous pattern of development. ■ Being subject to other urbanising influences. ■ Having physical feature(s) in reasonable proximity that could restrict and contain development.
Weak/No	<p>Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development.</p>

Purpose A definitions

3.13 The PPG uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

‘Large built-up area’

3.14 The PPG states that ‘villages should not be considered large built-up areas’ (PPG Paragraph: 005 Reference ID: 64-005-20250225). The implication of this is that towns and cities are large built-up areas. For the purpose of the Green Belt assessment all towns (as defined under Purpose B) are treated as large built-up areas including Royal Leamington Spa, Warwick, Kenilworth and Whitnash and their contiguous urban areas.

‘Free of existing development’

3.15 ‘Existing development’ should not be considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154 (listed in paragraph 2.21 of this report), such as agricultural and forestry buildings. Case law [\[See reference 10\]](#) generally considers that appropriate development does not affect the openness of the Green Belt. ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

‘Physical features in reasonable proximity...that could restrict and contain development’

3.16 Many features could be considered to define the edge of a developed area, including features created in association with new development, but the concept of ‘restricting’ and ‘containing’ development is considered to relate to the extent to which new development would be prevented from having an urbanising influence on land immediately beyond by intervening physical features. Urbanising influence (defined under the header ‘other urbanising influences’ directly below) is one of the factors identified in the PPG as being indicative of a ‘moderate’ contribution to Purpose A. If adjacent land which currently makes a ‘strong’ contribution to Purpose A, would, as a result of increased urbanising influence, make a weaker contribution, such that it became grey belt, then physical features would not be deemed to ‘restrict and contain’ development.

‘Enclosed by existing development’ (‘partially’ or ‘largely’)

3.17 The extent to which land can be considered to be enclosed by development is a judgement which depends on the strength of the existing development’s urbanising influence on neighbouring Green Belt land and the strength of the neighbouring Green Belt land’s physical and/or visual relationship with the wider countryside. The greater the proportion of a defined Green Belt area’s boundary that adjoins urban development (whether that is inset from the Green Belt or washed-over by it) the greater its enclosure. Strong urban edge boundary features which limit urbanising influence can limit a sense of enclosure or containment by adjoining development, as

long as there is some sense of connectivity with the wider countryside. Conversely, a lack of physical and visual connectivity with the wider countryside can increase the sense of enclosure, even if urban development around a Green Belt area is not strongly visible.

'Other urbanising influences'

3.18 Separate to the consideration of existing development within the Green Belt, 'other urbanising influences' could be land use or activity without development which is generally associated with urban areas, or it could be an urbanising influence from adjacent development, either inset within the Green Belt or outside but adjacent to Green Belt land.

3.19 The PPG refers to activity in the Green Belt, such as traffic generation, having an impact on openness. In some cases, there may be land uses which, although appropriate and not therefore affecting openness, still have an association with the urban area that constitutes a degree of urbanising influence. Notable examples could include sport and recreational playing fields or 'large areas of fixed surface infrastructure such as large areas of hardstanding [that have not blended into the landscape]', the latter of which is defined in the NPPF as PDL.

'An incongruous pattern of development'

3.20 The PPG cites an extended "finger" of development into the Green Belt as an example of an incongruous pattern of development. Where parcels are defined to reflect variations in contribution to the Green Belt purposes, they are unlikely to be finger-like in form, so this scenario would more typically relate to the assessment of specific development proposals.

3.21 Any breaching of a significant existing physical feature, or a significant combination of adjacent physical features, that currently serve to restrict and contain the existing large built-up area, would also form an incongruous pattern of development. Examples of this sort of step-change in settlement form would be development crossing a major retaining and containing road, railway or river, or extending out from a valley onto a hilltop into open Green Belt land that does not relate well to existing development.

Purpose B – to prevent neighbouring towns merging into one another

Grey belt PPG for Purpose B

Table 1.2 Assessment criteria for Purpose B

Rating	Assessment criteria
Strong	<p>The following features in combination are identified as being illustrative of a ‘strong’ contribution:</p> <ul style="list-style-type: none"> ■ Land forming a substantial part of a gap between towns. ■ Absence of existing development. ■ Development would result in the loss of visual separation of towns.
Moderate	<p>The presence of one or more of the following features in a gap between towns is identified as being illustrative of a ‘moderate’ contribution to Purpose B:</p> <ul style="list-style-type: none"> ■ Land forming a small part of a gap between towns. ■ Development would not result in the loss of visual separation of towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.
Weak/No	<p>Green Belt land that does not have a relationship with a gap between towns or forms only a very small part of a gap between towns, such that it makes no contribution to visual separation, is identified as being illustrative of a ‘weak/no’ contribution to Purpose B.</p>

Purpose B definitions

‘Towns’

3.22 The PPG states that ‘this purpose relates to the merging of towns, not villages’ (PPG Paragraph: 005 Reference ID: 64-005-20250225).

3.23 Where settlement hierarchies exist, settlements in higher tiers are classified as towns. The role and function of settlements, together with their spatial context, have already been taken into account in defining these hierarchies. Accordingly, for the purposes of this study, all relevant settlements within the top tier of the Warwick settlement hierarchy (Urban Areas and Towns) are considered to be ‘towns’ in this assessment. This includes:

- Royal Leamington Spa
- Warwick
- Kenilworth
- Whitnash

'A substantial part of a gap'

3.24 The PPG illustrative criteria refer to whether the assessment area forms a 'substantial part of a gap' or not. Whether part of a gap can be described as substantial is a function not just of its relative size to a gap as a whole but also the physical features in it. Some 'separating' physical features, such as woodlands, landform features, major roads, railways and rivers strengthen perceived separation, particularly where they contribute to visual separation. Roads and railways can also be 'connecting' features that strengthen the link between towns, reducing the time taken to pass through a gap and weakening the role of visual separators.

3.25 Smaller urban areas – villages and hamlets, industrial, educational and retail estates – between towns can be physically and visually connecting features, but if the scale of intervening development and/or the size of gap between the towns means that they are not considered 'neighbouring' then Purpose B will be less directly relevant. In these cases the contribution of open land in gaps between towns and smaller urban areas is addressed through Purpose A, which recognises the role of such land in preventing smaller 'satellite' settlements/developments from merging with towns.

3.26 A parcel will contribute more to the 'substance' of a gap between towns if it contains key separating physical features (e.g. landform, woodland). If a gap is more fragile, loss of a smaller part of the gap might be regarded as substantial.

3.27 The extent to which a gap is fragile or not (its fragility) is a key consideration in understanding what constitutes 'a substantial part of a gap'. Gap fragility is judged based on a combination of factors including the relative size of the gap and/or the presence/absence of connecting and separating features:

- A robust gap will typically be relatively wide and contain significant physical features that maintain visual separation.
- A moderate gap may be relatively wide but lack significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.
- A fragile gap will typically be relatively narrow and lack physical features that maintain visual separation.

3.28 Green Belt land can play a peripheral role, making a more limited contribution to separating towns where it does not directly lie within the gap, but where development would nonetheless weaken the contribution of Green Belt land in that gap. Similarly, Green Belt land within a gap may be regarded as peripheral if the neighbouring towns are already substantially connected by existing development.

3.29 Development expanding a town out into the core of a gap, removing a relatively large part of it, would clearly represent a substantial impact, but such scenarios would generally be captured as making a ‘strong’ contribution to Purpose A (and therefore not be eligible for definition as grey belt) as a consequence of a likely resulting incongruous pattern of development.

3.30 Relatively wide gaps between towns often have capacity to accommodate some development without significantly reducing the visual separation between the towns. As a result, large land parcels within or at the edge of such gaps—where their role in maintaining separation is considered substantial mainly because of their size—will generally be assessed as making a *moderate* contribution to Purpose B. This reflects the potential for parts of these areas to be developed while still retaining the visual distinction between neighbouring towns. In this way, the assessment findings can help identify potential areas of search (in Green Belt terms) for development, including the possibility of new settlements, within gaps between neighbouring towns.

A ‘small’ or ‘very small’ part of a gap’

3.31 ‘A small part of a gap’ is judged to be an ‘insubstantial’ part of it – that is, land in a gap that does not meet the ‘substantial’ definition above – but one which still provides a degree of visual separation.

3.32 A ‘very small’ part of gap is an area which does not contribute to visual separation, generally as a result of their existing development and/or containment and significant urbanisation. These areas will generally also make a weak/no contribution to Purpose A.

‘Loss of visual separation’

3.33 ‘Loss’ is interpreted as a ‘significant reduction’ in visual separation, rather than its complete removal. Typically the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation although, as noted in the section above, relatively wide gaps between towns could accommodate some degree of new development, isolated from any town, without a significant loss of visual separation, i.e. no more than a minor reduction in visual separation. Negligible reductions in visual separation are likely to be limited to areas already containing existing development and/or are contained and significantly urbanised by urban areas.

‘Free of existing development’

3.34 ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 11\]](#) generally considers does not affect the openness of the

Green Belt. ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

Purpose C – to protect the countryside from encroachment

Assessment criteria for Purpose C

3.35 Purpose C is not relevant to the identification of grey belt and is not referenced in the PPG, but it is still one of the five purposes of Green Belt set out in the NPPF.

Table 1.3 Assessment criteria for Purpose C

Rating	Assessment criteria
Strong	<p>The following features in combination are identified as being illustrative of a ‘strong’ contribution:</p> <ul style="list-style-type: none"> ■ Land is part of the countryside. ■ No significant but some urbanising influence but a lack of features to restrict and contain development, such that were development to take place, there would be a stronger urbanising impact on adjacent Green Belt land than is currently the case.
Moderate	<p>The following features in combination are identified as being illustrative of a ‘moderate’ contribution:</p> <ul style="list-style-type: none"> ■ Land is part of the countryside. ■ Some urbanising influence. ■ The presence of features to restrict and contain development, such that were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.
Weak/No	<p>The following features in combination are identified as being illustrative of a ‘weak/no’ contribution:</p> <ul style="list-style-type: none"> ■ Land is wholly or largely contained from the wider countryside by development, or openness is significantly limited by existing development. ■ Significant urbanising influence. ■ Were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

Purpose C definitions

3.36 Purpose C is assessed by determining the extent to which a location can be considered part of the countryside, the level of urbanising influence affecting it and whether or not development in the parcel would significantly increase urbanising influence on adjacent open land.

‘Part of the countryside’

3.37 Green Belt land is part of the countryside where it is open and has a clear connection with the wider open countryside. Physical isolation from the wider countryside, uses which create a strong association with an urban area, or the presence of existing urban development can affect what is judged to be countryside in Green Belt terms. This is not a judgement which considers the scenic beauty, ecological value or condition of land and does not consider or prejudice any definitions of countryside set out in Local Plans.

‘Urbanising influence’

3.38 This is defined as a combination of both the influences of ‘existing development’ and ‘other urbanising influences’ (both defined under Purpose A above). This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates.

3.39 Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.

Purpose D – to preserve the setting and special character of historic towns

Grey belt PPG for Purpose D

Table 1.4 Assessment criteria for Purpose D

Rating	Assessment criteria
Strong	The following features in combination are identified as being illustrative of a ‘strong’ contribution: <ul style="list-style-type: none"> ■ Absence of existing development. ■ Form part of the setting of a historic town. ■ Land makes a considerable contribution to a historic town’s special character – being within, adjacent, or of significant visual importance to historic aspects.
Moderate	The presence of one or more of the following features, in addition to being part of the setting and/or contributing to the special character of a historic town, is identified as being illustrative of a ‘moderate’ contribution to Purpose D: <ul style="list-style-type: none"> ■ Containing existing development. ■ Separated from historic aspects of the town by existing development or topography.

Rating	Assessment criteria
	<ul style="list-style-type: none"> ■ No important visual, physical, or experiential relationship to historic aspects of a town.
Weak/No	Land that does not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town is illustrative of a 'weak/no' contribution to Purpose D.

Purpose D definitions

3.40 The PPG uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

'Historic town'

3.41 The PPG is clear that this purpose relates to historic towns, not villages (PPG Paragraph: 005 Reference ID: 64-005-20250225). An extract from Hansard in 1988 clarified which historic settlements in England were certainly considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge [See reference 12]. Durham has since been added to this list.

3.42 It has been LUC's experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive. Therefore, the settlements referenced under the definitions of 'large built-up area' (see section titled Purpose A definitions) and 'town' (see section titled Purpose B definitions) above all have the potential to be defined as 'historic towns' relevant to the assessment of Purpose D, subject to the definition of their historic settings or special character.

3.43 Clearly there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement's setting, such that some degree of special character results. Many towns have designated conservation areas, but these are commonly focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than key to special character.

3.44 For the purposes of this study it has been assumed that Royal Leamington Spa is a historic town, owing to the settlement having multiple records of pre-1900 development and a large conservation area preserving the planned town layout and buildings from across the 19th and 20th centuries.

‘Setting and special character’

3.45 The extent to which the Green Belt contributes to the setting and special character of a historic town is related to the visual, physical and/or experiential relationship between Green Belt land and historic aspects of a town.

3.46 What forms part of a historic town's setting and/or contributes to the special character of a historic town is a matter of professional judgement that cannot be defined in general terms. It is unique to each historic town's character, townscape and connections to the wider landscape.

3.47 The connection between a historic town's historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

‘Historic aspects’

3.48 In order to establish the relevance of Green Belt land to historic aspects of a historic town it is necessary to review and research each historic town's historic aspects in turn.

3.49 Recorded references to the open countryside or key physical features and/or landmarks in the Green Belt are useful in judging and justifying the appropriate level of contribution relevant Green Belt land makes to a historic town's setting and special character.

3.50 Many historic towns have historic aspects that have little to no relationship with their setting and special character, and many historic towns contain historic areas focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than part of the historic town's setting and special character. Where this is the case, contribution to Purpose D can often be ruled out, noting that this does not mean such places do not have special and unique characteristics worthy of preservation, just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D.

‘Free of existing development’

3.51 ‘Free of existing development’ is defined under Purpose A and B above. The same definition applies to Purpose D.

Purpose E – to assist in urban regeneration

3.52 Purpose E is not relevant to the identification of grey belt and is not referenced in the PPG, but it is one of the five purposes of Green Belt set out in the NPPF.

3.53 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspector's judgements on the matter, such as the inspector's report re: the London Borough of Redbridge's Local Plan (January 2018), which noted that with regards to Purpose E 'this purpose applies to most land' but that 'it does not form a particularly useful means of evaluating sites' [\[See reference 13\]](#).

Grey belt

3.54 In line with PPG guidance, land which makes a strong contribution to Purpose A, B or D is not defined as grey belt. Parcels that do not make a strong contribution to purposes A, B or D could provisionally defined as grey belt until such time as the plan-making and development management processes are able to establish whether NPPF footnote 7 areas and assets provide a strong reason for restricting or refusing development in these locations, respectively.

Fundamental impacts to remaining Green Belt land

3.55 Green Belt assessments must also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. The PPG states that this judgement should focus on evaluating the effect of release or development on 'the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'.

3.56 What is fundamental and meaningful could vary significantly based on the scale and nature of the plan area and the range, significance and extent of contribution Green Belt land makes to the Green Belt purposes within it.

Key definitions

3.57 The PPG uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

‘Plan area’

3.58 The plan area in the context of this study is the South Warwickshire Local Plan area.

‘Purposes (taken together)’

3.59 Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. Consequently, what constitutes a fundamental and meaningful impact will vary depending on which purposes are important. Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

‘Fundamental’ and ‘meaningful’

3.60 Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in a particular plan area to serve a single important purpose to have a meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful.

3.61 The scale and contiguity of Green Belt land within a plan area may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land are likely to be more meaningful in a plan area with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

3.62 A fundamental and meaningful impact on **Purpose A** (to check the unrestricted sprawl of large built-up areas) may include, but is not limited to, where release or development of land would result in the physical or perceived merging of a large built-up area with an adjacent satellite settlement such that the adjacent settlement would be perceived to be part of a larger ‘sprawling’ large built-up area. How fundamental and meaningful the loss of a such a gap would be is dependent on its current contribution to Purpose A. Most sprawl of a large built-up area will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function.

3.63 A fundamental and meaningful impact on **Purpose B** (to prevent neighbouring towns from merging into one another) include but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B. Whether the

merging of two neighbouring towns is meaningful may also be influenced by the number of neighbouring towns that could remain distinctly separate by remaining Green Belt land.

3.64 A fundamental and meaningful impact on **Purpose C** (to assist in safeguarding the countryside from encroachment) may include but is not limited to where release or development would sever and isolate an area of Green Belt land contributing strongly to Green Belt Purpose C from the wider designation. The vast majority of Green Belt land has at least some countryside function. The release or development of the vast majority of Green Belt land would likely not fundamentally and meaningfully influence the function of adjacent Green Belt land such that it would be cease be considered countryside.

3.65 A fundamental and meaningful impact on **Purpose D** (to preserve the setting and special character of historic towns) may include but is not limited to the release or development of an important or very important part of the setting of a historic town, integral to its special character.

3.66 A fundamental and meaningful impact on **Purpose E** (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritise the use of non-Green Belt locations first followed by previous developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully undermined.

Chapter 4

Assessment Findings

4.1 The following chapter sets out the Green Belt assessment findings.

4.2 Following assessment of the variation in the performance of the Green Belt within the Study Area, six parcels (references 'OMB' 1-6) were identified.

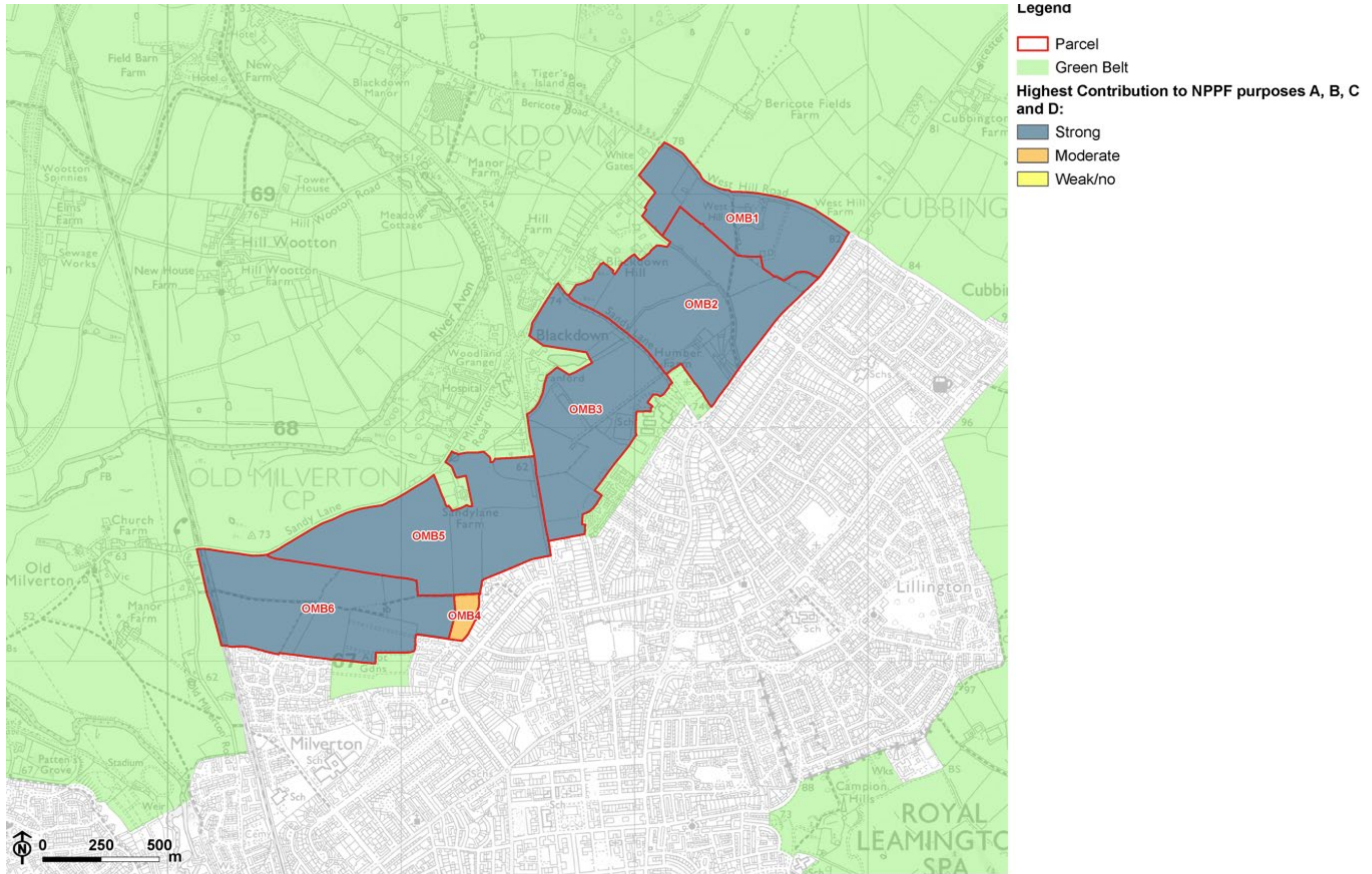
4.3 **Table 1.1** below details the contribution of each purpose to each parcel and **Figure 4.1** details the highest scoring rating for each parcel across purposes A-D.

Table 4.1: Contribution of Parcels to NPPF Purposes and identification of Grey Belt

Parcel Ref	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt?
OMB1	Strong	Moderate	Strong	Weak	Equal	No
OMB2	Strong	Moderate	Strong	Weak	Equal	No
OMB3	Strong	Moderate	Strong	Weak	Equal	No
OMB4	Moderate	Weak	Moderate	Weak	Equal	Yes
OMB5	Strong	Weak	Strong	Weak	Equal	No
OMB6	Strong	Weak	Strong	Weak	Equal	No

4.4 A summary of the contribution within each parcel to the NPPF Green Belt purposes is set out below and full parcel assessment proformas are included in **Appendix A**.

Figure 4.1: Highest scoring rating for each parcel across purposes A-D



Purpose A

4.5 For Purpose A, five of the parcels were found to make a strong contribution, these parcels largely lack any significant urbanising influence and have an absence of development. The parcels also lack features that would adequately restrict and contain development to limit the urbanising influence of any development within the parcels.

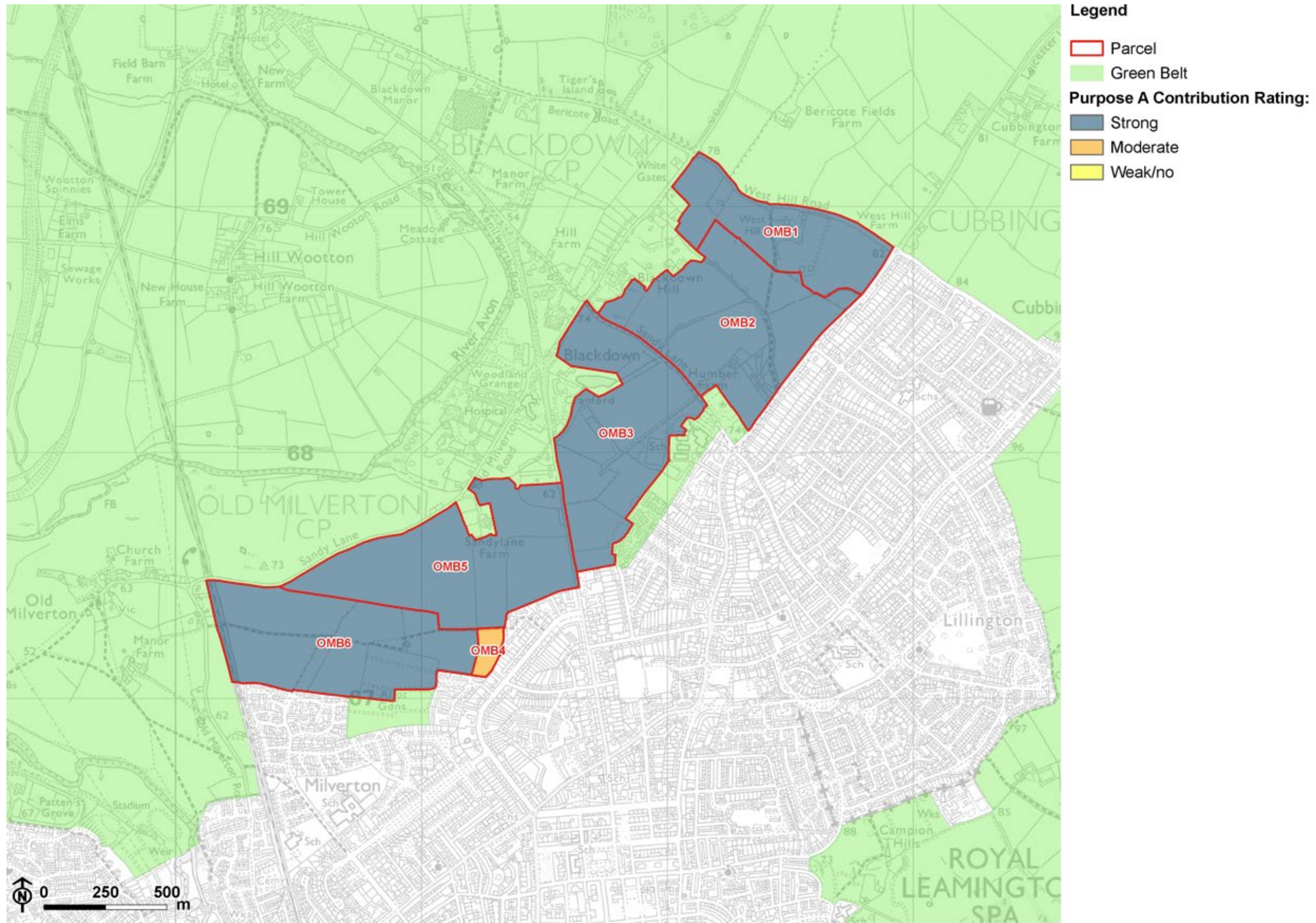
4.6 However, it should be noted that Blackdown, although not classified as a 'large built-up area' (LBUA), is in close proximity to Royal Leamington Spa. As a result, it is not sufficiently distinct, and any expansion could be perceived as sprawl from the LBUA. Consequently, parcels that maintain the gap between Blackdown and the LBUA (OMB1, OMB2, OMB3, OMB5, OMB6) are considered to make a strong contribution to Purpose A.

4.7 Parcel OMB6 is partly contained by the railway line to the west, however, this lies directly adjacent to the settlement of Old Milverton and it is considered development of the parcel would result in the loss of separation from the smaller settlement and the LBUA. The lack of separation would result in a settlement that is not distinct from Royal Leamington Spa and as such result in the unrestricted sprawl of the LBUA itself.

4.8 OMB4 is considered to provide a moderate contribution as although it does not contain any development within the parcel, it would not form an incongruous part of the settlement, nor result in any significant further urbanising influence on the countryside that would undermine the contribution of neighbouring parcels.

4.9 Figure 4.2 provides an overview of the contribution of each parcel to Purpose A.

Figure 4.2: Contribution of each parcel to Purpose A



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Purpose B

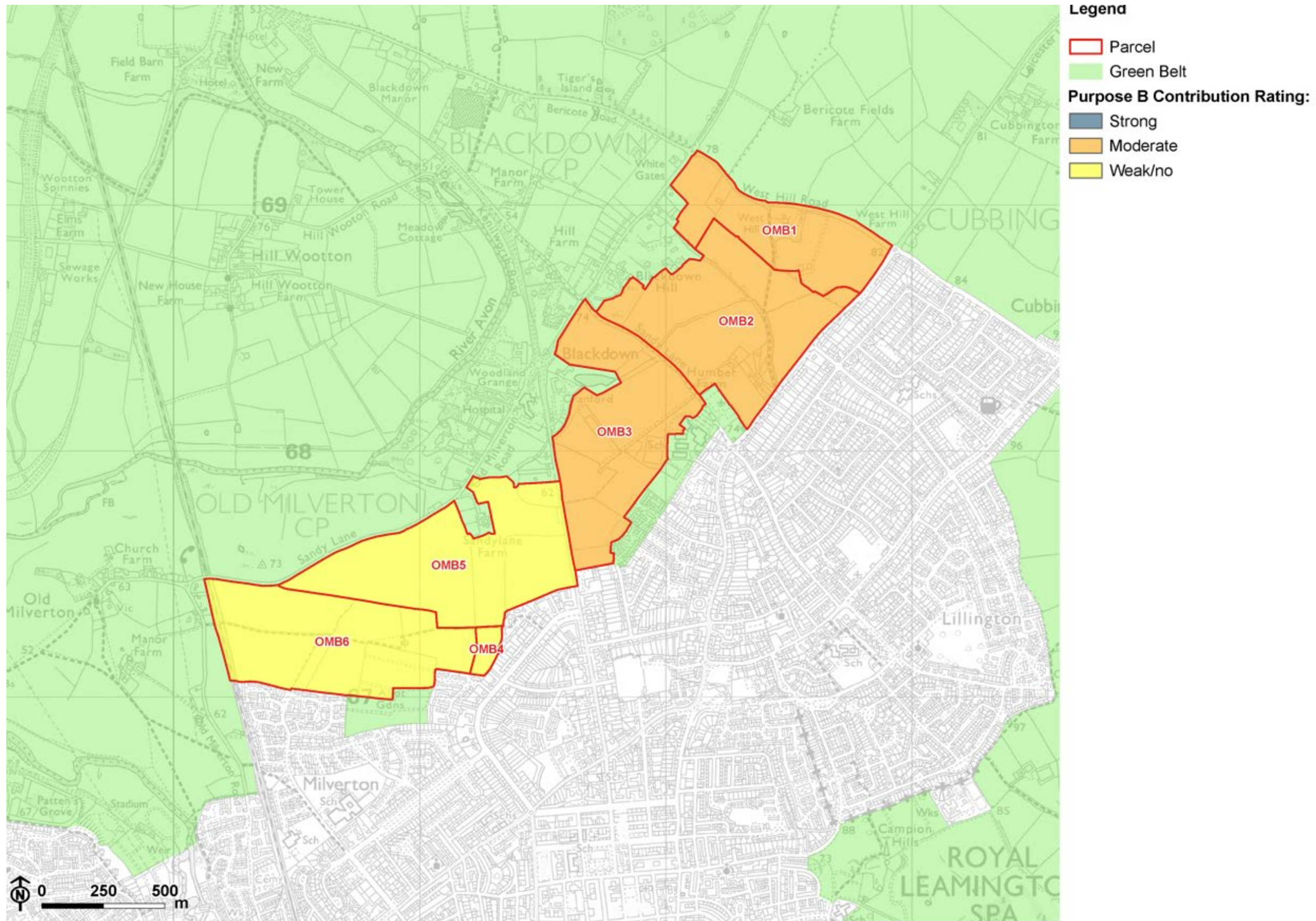
4.10 All of the parcels within the study area lie within the gap between Royal Leamington Spa and Kenilworth. This gap is relatively robust, with the River Avon and intervening higher ground and tree cover contributing to physical and visual separation, although there are direct connecting road and rail links.

4.11 Rising landform and existing development alongside the B4113 would largely contain development in the study area from the rest of the gap between towns, so no land here makes a strong contribution to Purpose B. Development extending either Leamington or Kenilworth into the valley of the River Avon, which forms the core of the gap, would have a more significant impact in this regard.

4.12 Some parcels make a weak contribution to Purpose B but those in the northern/eastern half of the study area lie adjacent to roads which link the towns, and where development in the Green Belt weakens the wider gap a little, so contribution here is moderate.

4.13 **Figure 4.3** provides an overview of the contribution of each parcel to Purpose B.

Figure 4.3: Contribution of each parcel to Purpose B

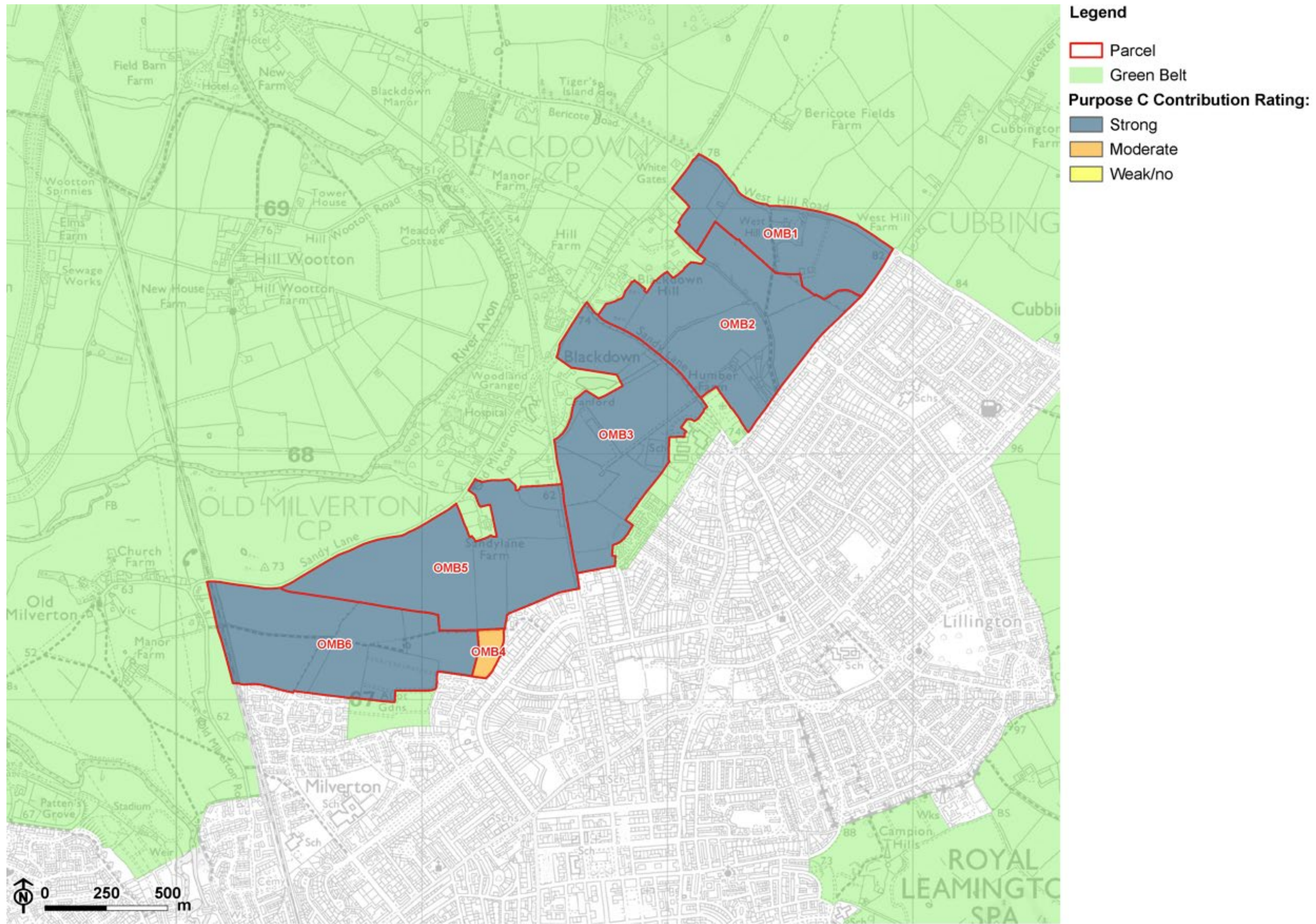


Purpose C

4.14 Purpose C relates to the encroachment of the countryside. With the exception of Parcel OMB4, all play a strong role in relation to preventing encroachment on the countryside. Furthermore, as most of the parcels lack features that would restrict and contain, and urbanising influence, the performance matches that of Purpose A – where development in one parcel would likely impact an adjacent parcel resulting in further encroachment into the countryside.

4.15 Figure 4.4 provides an overview of the contribution of each Parcel to Purpose C.

Figure 4.4: Contribution of each parcel to Purpose C



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Purpose D

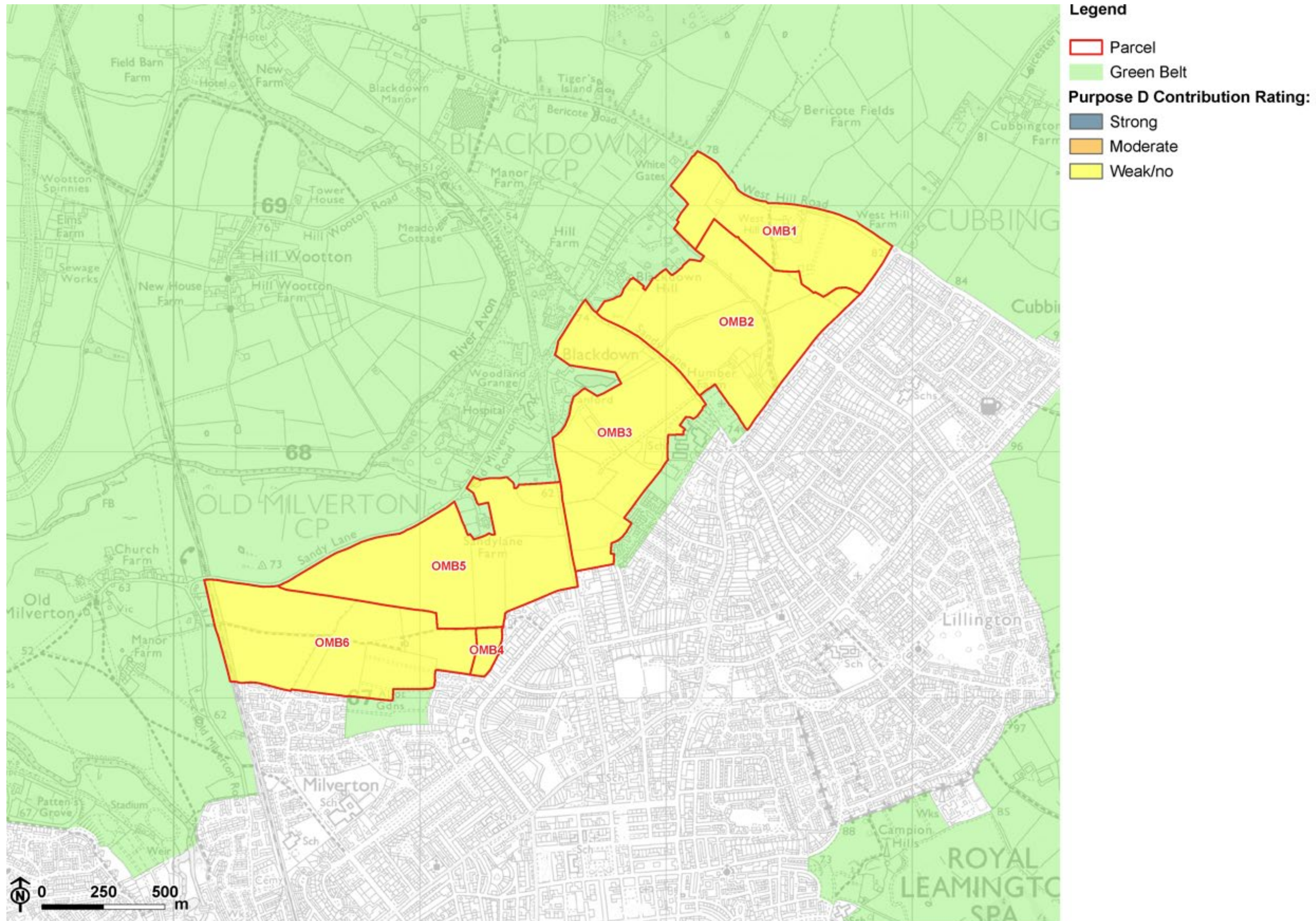
4.16 The parcels are all considered to be near to the historic town of Royal Leamington Spa. Whilst the study area adjoins the settlement, vegetation and modern development limit any significant perception of its historic core. It is acknowledged that there is some gradient change within the study area (with the ground level rising to the north), however, this is a gradual change and results in only a small area of increased elevation.

4.17 It is acknowledged the Conservation Area (which contains the historic core of the town), partly abuts the study area however, this is a small part of Northumberland Road, where modern development along Bamburgh Grove and Fairhurst Drive project beyond this part of the Conservation area.

4.18 The conservation area appraisal does not make reference to land beyond the settlement contributing to the historic aspects of the town. As such, it is considered that the Green Belt in the study area has no significant visual, physical or experiential connection of the historic aspects of the town.

4.19 **Figure 4.5** provides an overview of the contribution of each Parcel to Purpose D.

Figure 4.5: Contribution of each parcel to Purpose D



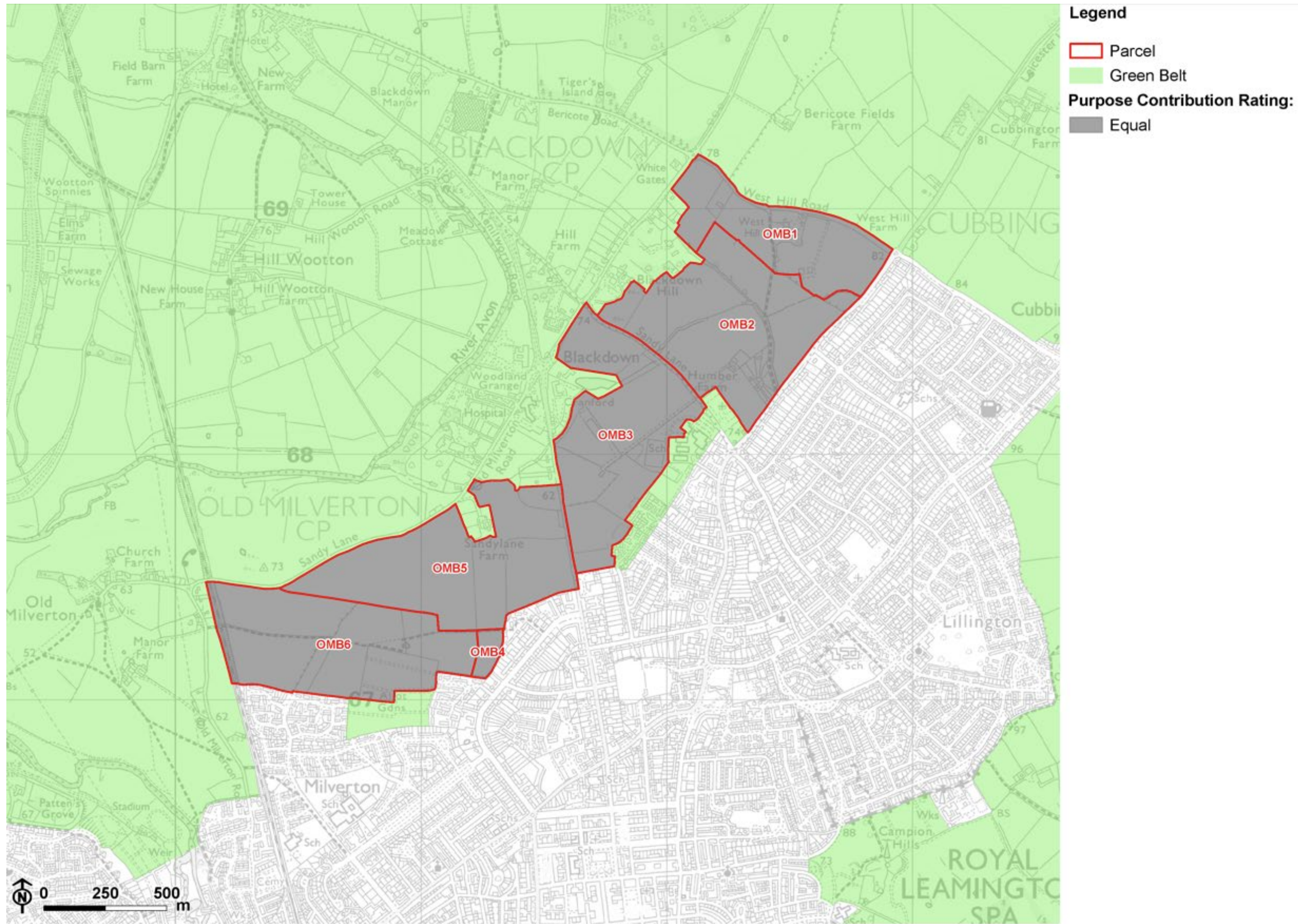
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Purpose E

4.20 All Green Belt is considered to make an equal contribution to Purpose E.

4.21 **Figure 4.6** provides an overview of the contribution of each Parcel to Purpose E.

Figure 4.6: Contribution of each parcel to Purpose E



Grey Belt

4.22 One parcel within the study area is considered to not make a ‘strong’ contribution to purposes A, B and D - parcel OMB4. This parcel has a degree of containment by the settlement to such a degree that development would not be incongruous.

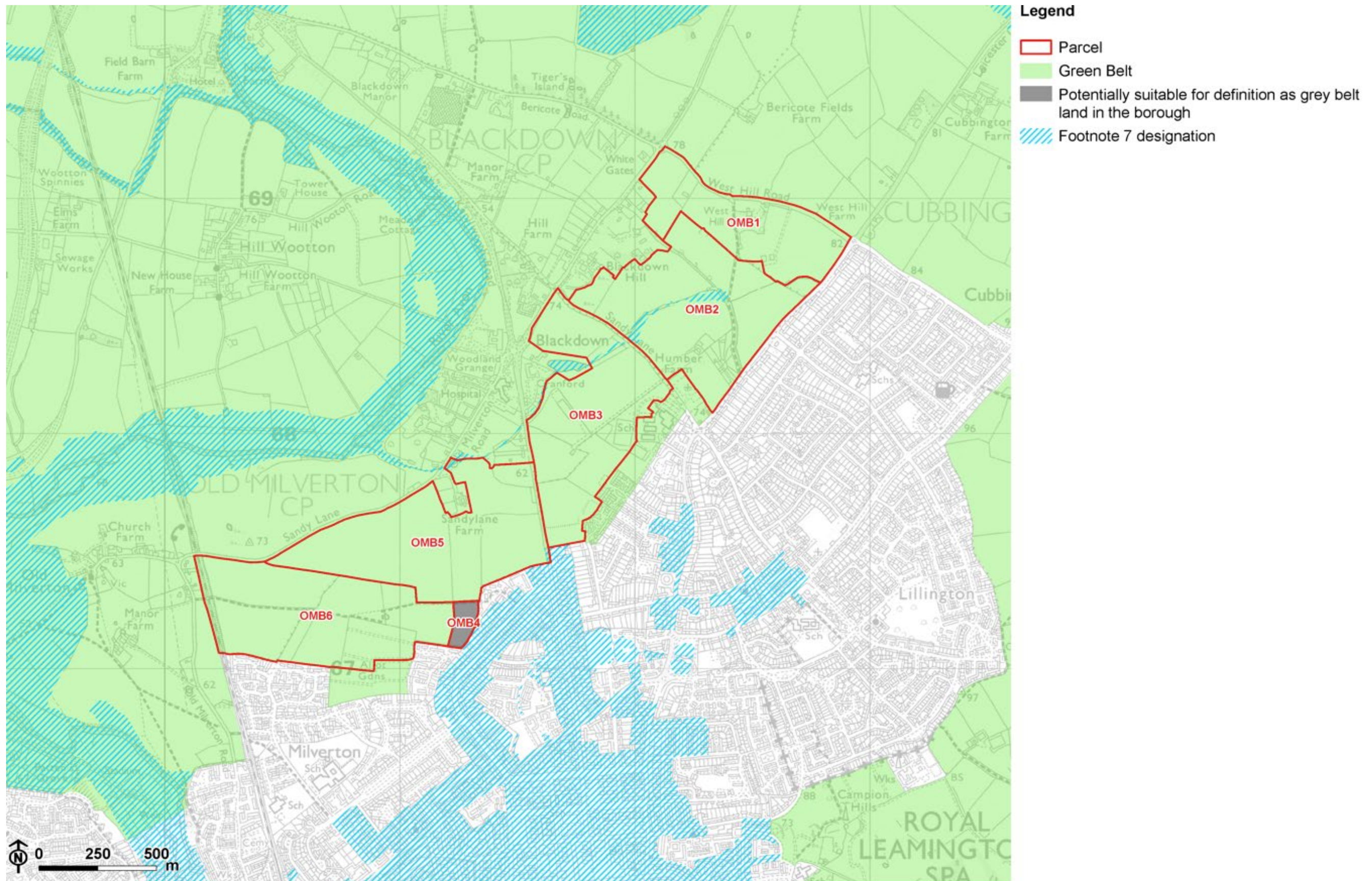
4.23 Figure 4.7 provides an overview of the grey belt within the study area.

Fundamental impact

4.24 As set out above, land within the study area makes its strongest contribution to Green Belt purposes A (to check the unrestricted sprawl of large built-up areas) and C (to assist in safeguarding the countryside from encroachment). The release and development of Green Belt land within the study area is not considered likely, in itself, to fundamentally undermine the contribution of the remaining Green Belt in respect of these purposes. This is because adjacent and wider areas of Green Belt would continue to perform these roles.

4.25 However, in the absence of detailed information regarding the location, scale and form of development, as well as the extent and distribution of any Green Belt releases across the plan area (including cumulative allocations), it is not possible to reach a definitive conclusion on whether the integrity of the Green Belt, taken as a whole, would be fundamentally undermined. A comprehensive assessment of such impacts should therefore be undertaken by the local planning authority through the preparation of the Local Plan.

Figure 4.7: Overview of the grey belt within the study area



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Appendix A

Parcel Assessments

A.1 The individual parcel assessment proformas include




- Map of each parcel with Footnote 7 designations, and an aerial view.
- Locational description, and description of the relationship between the parcel and the settlement, and with the wider countryside.
- Parcel ratings for contribution to each of the Green Belt Purposes, and summary of the key factors supporting the assessed contribution ratings.
- Concluding text to indicate whether the parcel is identified as grey belt, or potential grey belt, on the basis of its contribution ratings and in line with the February 2025 PPG.

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Additional map information: NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within the study area or local data sets were not readily available.

Parcel OMB1



-  OMB1
-  Neighbouring parcel
-  Green Belt

NPPF Footnote 7 designations

-  Flood zone 2
-  Flood zone 3



Contribution of land in Parcel OMB1

Parcel OMB1 Assessment Conclusions

Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Strong	Moderate	Strong	Weak	Equal	No

Parcel OMB1 Description

Parcel Location, Land Uses and Boundaries
<p>The parcel is located to the north-west of Royal Leamington Spa beyond Leicester Lane (A445). The parcel adjoins West Hill Road and comprises open undeveloped land and isolated dwellings. Blackdown lies to the west of the parcel.</p> <p>There is a moderate boundary feature between the settlement and the parcel. The A445 separates the parcel from the settlement to the south-east.</p> <p>There is no significant change in landform to create a sense of separation between the settlement and the parcel.</p> <p>There is some perception of urban development outside of the parcel.</p> <p>There is no significant urbanising development or activity in the Green Belt affecting this parcel.</p> <p>A gently rising landform and tree cover create a degree of containment from the wider countryside.</p>

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Strong contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Royal Leamington Spa is a town and so is defined as a large built-up area.

Assessment Considerations	Assessment
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel but this diminishes with distance from Leamington.
Are there physical features in reasonable proximity that could restrict and contain development?	There are no physical features strong enough to restrict and contain development. The parcel has only hedgerow boundaries and intermittent boundary trees, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would have an incongruous impact on the urban pattern. The lack of features to restrict and contain development mean that although the parcel is subject to some urbanising influence, development here would have an incongruous impact.

Purpose B: Preventing neighbouring towns from merging:

Weak contribution

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel lies in a relatively robust gap between Royal Leamington Spa and Kenilworth. Intervening development at Blackdown and the presence of connecting roads adjacent to the parcel weaken it slightly but the River Avon, high ground around Blackdown Hill and tree cover serve to strengthen separation..
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
Does the parcel form a substantial, small or very small part of the gap?	The parcel forms a small part of the gap and lacks any strong separating features.

Assessment Considerations	Assessment
Would development result in loss of visual separation between towns?	Development of land in the parcel would likely have a minor impact on visual separation between towns.

Purpose C: Assisting in safeguarding the countryside from encroachment:

Strong contribution

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel but this diminishes with distance from Leamington.
Would development impact adjacent Green Belt land?	Development in the parcel would significantly increase the urbanising influence on adjacent open land. The parcel has only tree line and hedgerow boundaries, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land.

Purpose D: Preserving the setting and special character of historic towns:

Weak contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	Royal Leamington Spa is a historic town and this parcel forms part of its setting.

Assessment Considerations	Assessment
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes little or no contribution to the special character of the historic town. Whilst the Green Belt adjoins the town its relationship is principally with modern development and has no distinctive characteristics that contribute significantly to historic setting and special character.

**Purpose E – Assisting in urban regeneration:
Equal contribution**

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

The parcel makes a strong contribution to Green Belt Purpose A and therefore does not meet the definition of Grey Belt.

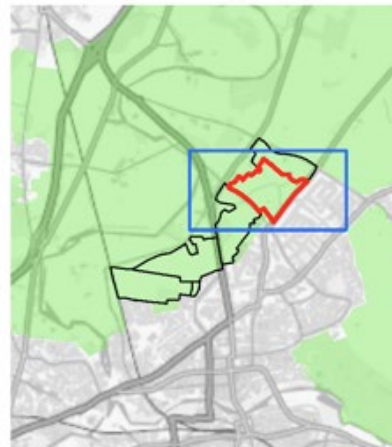
Parcel OMB2



- OMB2
- Neighbouring parcel
- Green Belt

NPPF Footnote 7 designations

- Flood zone 2
- Flood zone 3



Contribution of land in Parcel OMB2

Parcel OMB2 Assessment Conclusions

Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Strong	Moderate	Strong	Weak	Equal	No

Parcel OMB2 Description

Parcel Location, Land Uses and Boundaries
<p>The parcel is located to the north-west of Royal Leamington Spa beyond Leicester Lane (A445). The parcel adjoins the Plymouth Brethren Christian Church and comprises open undeveloped and two isolated dwellings. Blackdown lies to the north-west of the parcel.</p> <p>A combination of features forms a boundary of moderate strength between the settlement and the parcel. The parcel is separated from the settlement via the A445 and adjoining hedgerows and tree lines.</p> <p>There is some change in landform which creates a sense of separation between the settlement and the parcel. The parcel features a localised depression within its centre, with both Blackdown and Leamington lying at a higher ground level than the parcel.</p> <p>There is some perception of urban development outside of the parcel. The settlement edge of Leamington is perceptible from the parcel, but Blackdown features a number of mature trees and hedgerows which in conjunction with its limited built restrict perception of the village.</p> <p>There is no significant urbanising development or activity in the Green Belt affecting this parcel. Whilst the parcel features two dwellings, the wider parcel largely comprises open undeveloped land.</p> <p>A gently rising landform and tree cover create a degree of containment from the wider countryside.</p>

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Strong contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Royal Leamington Spa is a town and so is defined as a large built-up area.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Are there physical features in reasonable proximity that could restrict and contain development?	There are no physical features strong enough to restrict and contain development. The parcel forms the strongest part of the gap between Royal Leamington Spa and Blackdown. Any partial development here would weaken the integrity of Blackdown as a settlement distinct from Royal Leamington Spa.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would have an incongruous impact on the urban pattern. The loss of separation between Royal Leamington Spa and Blackdown, causing Blackdown to become part of the large built-up area, would be a significant change to the urban pattern. The openness of this parcel is playing a role in preventing that.

Purpose B: Preventing neighbouring towns from merging:

Weak contribution

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel lies in a relatively robust gap between Royal Leamington Spa and Kenilworth. Intervening development at Blackdown and the presence of connecting roads adjacent to the parcel weaken it slightly but the River Avon, high ground around

Assessment Considerations	Assessment
	Blackdown Hill and tree cover serve to strengthen separation.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
Does the parcel form a substantial, small or very small part of the gap?	The parcel forms a small part of the gap and lacks any strong separating features.
Would development result in loss of visual separation between towns?	Development of land in the parcel would likely have a minor impact on visual separation between towns.

Purpose C: Assisting in safeguarding the countryside from encroachment:

Strong contribution

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Would development impact adjacent Green Belt land?	Development in the parcel would significantly increase the urbanising influence on adjacent open land. The parcel has only tree line and hedgerow boundaries, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land.

Purpose D: Preserving the setting and special character of historic towns:

Weak contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	Royal Leamington Spa is a historic town and this parcel forms part of its setting.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes little or no contribution to the special character of the historic town. Whilst the Green Belt adjoins the town its relationship is principally with modern development and has no distinctive characteristics that contribute significantly to historic setting and special character.

Purpose E – Assisting in urban regeneration:

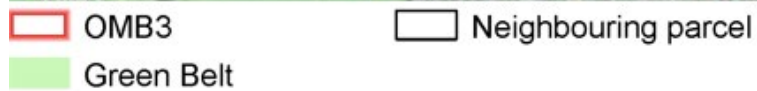
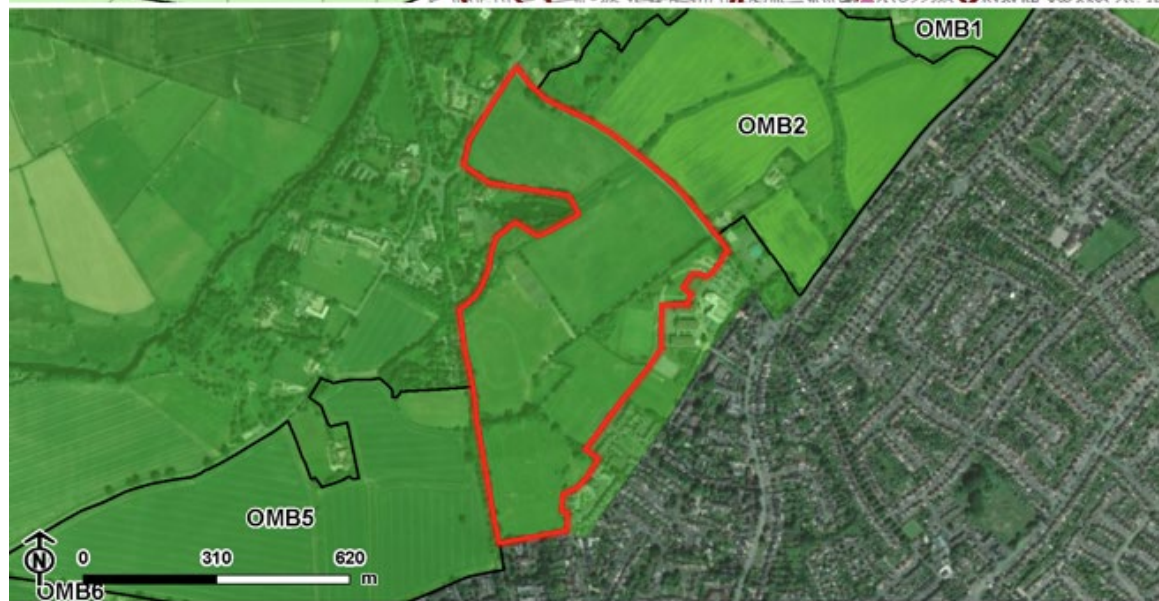
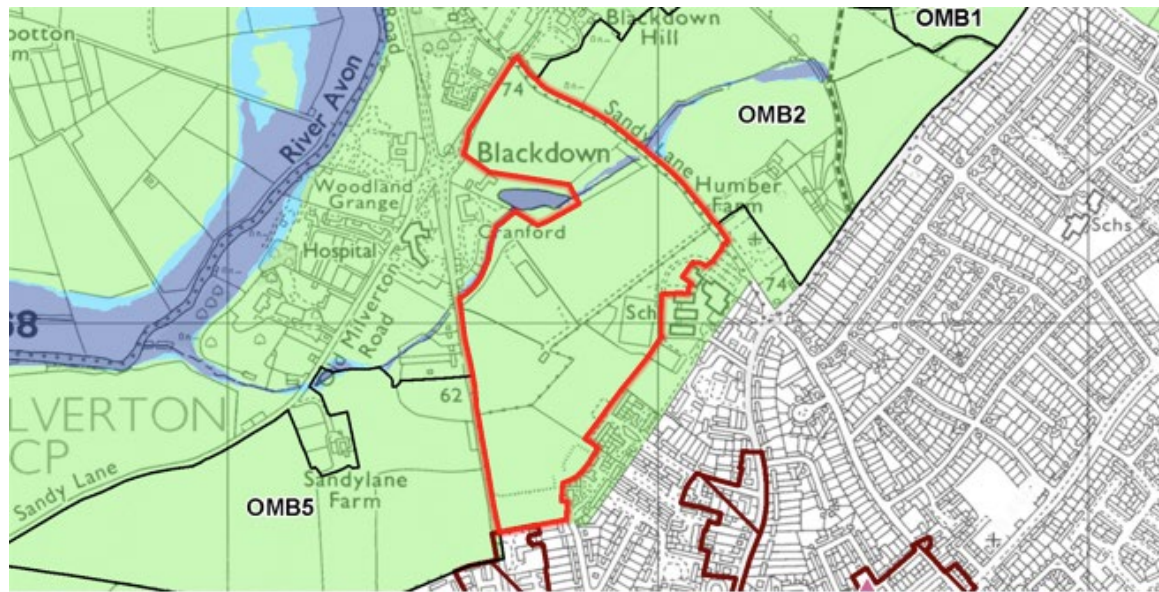
Equal contribution

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

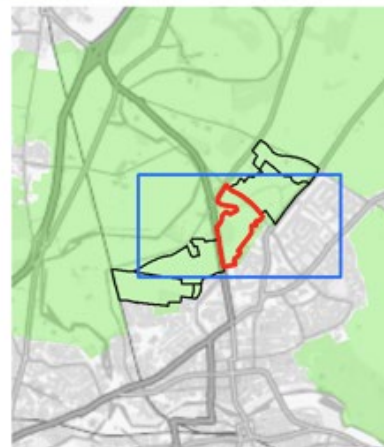
The parcel makes a strong contribution to Green Belt Purpose A and therefore does not meet the definition of Grey Belt.

Parcel OMB3



NPPF Footnote 7 designations

-  Listed building
-  Flood zone 2
-  Flood zone 3
-  Conservation area



Contribution of land in Parcel OMB3

Parcel OMB3 Assessment Conclusions

Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Strong	Moderate	Strong	Weak	Equal	No

Parcel OMB3 Description

Parcel Location, Land Uses and Boundaries
<p>The parcel is located to the north-west of Royal Leamington Spa and south/south-east of Blackdown. The parcel features open undeveloped land and includes the sports pitches and courts associated with North Leamington School and Kingsley School Fields.</p> <p>There are no significant boundary features to separate the parcel from the settlement. The parcel boundary adjoining Royal Leamington Spa comprise residential property lines. Washed over development within the green belt adjoining the parcel effectively expands the settlement into the green belt further weakening the role of any boundaries intervening between the parcel and the settlement.</p> <p>There is no significant change in landform to create a sense of separation between the settlement and the parcel.</p> <p>There is some perception of urban development outside of the parcel.</p> <p>There is no significant urbanising development or activity in the Green Belt affecting this parcel.</p> <p>There is some perception of connectivity with the wider countryside, limiting the impact of any existing urbanising influence. Owing to weak parcel boundaries to the north-east and the landform the parcel has some perception of the wider countryside.</p>

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Strong contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Royal Leamington Spa is a town and so is defined as a large built-up area.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel but this reduces with distance from the urban edge.
Are there physical features in reasonable proximity that could restrict and contain development?	There are no physical features that could restrict and contain development. The parcel has only hedgerow boundaries and intermittent boundary trees, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land. Further, the parcel forms a large part of the gap between Royal Leamington Spa and Blackdown. Any partial development of the parcel would weaken the remainder.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would have an incongruous impact on the urban pattern. The lack of features to restrict and contain development mean that, although the parcel is subject to some urbanising influence, development here would have an incongruous impact. Further, the loss of separation between Royal Leamington Spa and Blackdown causing Blackdown to become part of the large built up area, would be a significant change to the urban pattern. The openness of this parcel is playing a role in preventing that.

Purpose B: Preventing neighbouring towns from merging:**Weak contribution**

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel lies in a relatively robust gap between Royal Leamington Spa and Kenilworth. Intervening development at Blackdown and the presence of connecting roads adjacent to the parcel weaken it slightly but the River Avon, high ground around Blackdown Hill and tree cover serve to strengthen separation.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
Does the parcel form a substantial, small or very small part of the gap?	The parcel forms a small part of the gap and lacks any strong separating features.
Would development result in loss of visual separation between towns?	Development of land in the parcel would likely have a minor impact on visual separation between towns.

Purpose C: Assisting in safeguarding the countryside from encroachment:**Strong contribution**

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel but this reduces with distance from the urban edge.
Would development impact adjacent Green Belt land?	Development in the parcel would significantly increase the urbanising influence on adjacent open land. The parcel has only tree line and hedgerow

Assessment Considerations	Assessment
	boundaries, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land.

Purpose D: Preserving the setting and special character of historic towns:

Weak contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	Royal Leamington Spa is a historic town and this parcel forms part of its setting.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes little or no contribution to the special character of the historic town. Whilst the Green Belt adjoins the town its relationship is principally with modern development and has no distinctive characteristics that contribute significantly to historic setting and special character.

Purpose E – Assisting in urban regeneration:

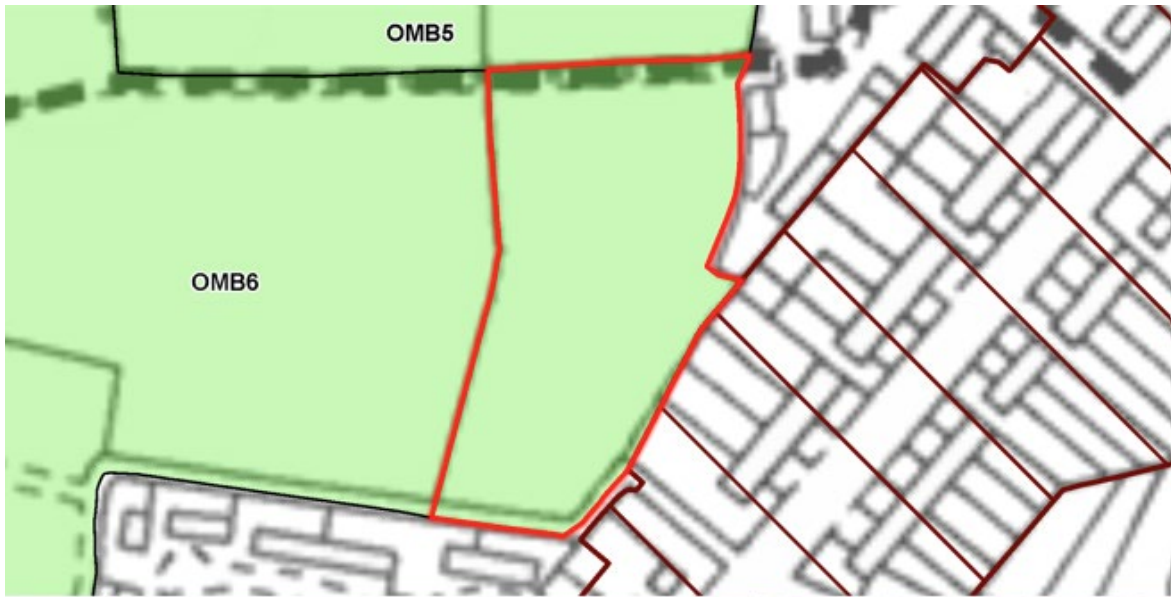
Equal contribution

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

The parcel makes a strong contribution to Green Belt Purpose A and therefore does not meet the definition of Grey Belt.

Parcel OMB4



-  OMB4
-  Neighbouring parcel
-  Green Belt

JPPF Footnote 7 designations

-  Conservation area



Contribution of land in Parcel OMB4

Parcel OMB4 Assessment Conclusions

Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Moderate	Weak	Moderate	Weak	Equal	Yes

Parcel OMB4 Description

Parcel Location, Land Uses and Boundaries
<p>The parcel lies to the north of Royal Leamington Spa beyond the residential property lines of dwellings along Fairhurst Drive and Northumberland Road.</p> <p>There are no significant boundary features to separate the parcel from the settlement. Whilst the parcel features some mature tree lines to the south, the parcel boundaries largely comprise residential property lines which form a weak separation from the settlement.</p> <p>There is no significant change in landform to create a sense of separation between the settlement and the parcel.</p> <p>There is some perception of urban development outside of the parcel.</p> <p>There is no significant urbanising development or activity affecting this parcel.</p> <p>There is some perception of connectivity with the wider countryside, limiting the impact of any existing urbanising influence.</p>

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Moderate contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Royal Leamington Spa is a town and so is defined as a large built-up area.

Assessment Considerations	Assessment
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Are there physical features in reasonable proximity that could restrict and contain development?	The parcel’s hedgerow boundaries are not strong physical features that could restrict and contain development. Development in the parcel could have some urbanising impact on land beyond.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would not have an incongruous impact on the urban pattern. Although development in the parcel would not be restricted and contained, there is sufficient urbanising containing influence to limit the extent to which it would be incongruous with the current pattern.

Purpose B: Preventing neighbouring towns from merging:

Weak contribution

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel lies in a relatively robust gap between Royal Leamington Spa and Kenilworth. Intervening development at Blackdown and Hill Wootton weaken it slightly but the River Avon, high ground around Hill Wootton and tree cover serve to strengthen separation.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
Does the parcel form a substantial, small or very small part of the gap?	The parcel forms a very small part of the gap.

Assessment Considerations	Assessment
Would development result in loss of visual separation between towns?	Development of land in the parcel would likely have a negligible impact on visual separation between towns.

Purpose C: Assisting in safeguarding the countryside from encroachment:

Moderate contribution

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Would development impact adjacent Green Belt land?	Development in the parcel would not significantly increase the urbanising influence on adjacent open land. Boundary treatment of allotments to the west and hedgerows with boundary trees to the north, mark the parcel boundary. Development in the parcel could have some urbanising impact on land beyond but would not significantly weaken its contribution to Purpose C.

Purpose D: Preserving the setting and special character of historic towns:

Weak contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	Royal Leamington Spa is a historic town and this parcel forms part of its setting.

Assessment Considerations	Assessment
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes little or no contribution to the special character of the historic town. Whilst the Green Belt adjoins the town, its relationship is principally with modern development. It is noted that the dwellings along Northumberland Road fall within the Royal Leamington Spa Conservation Area. The Conservation Area Appraisal does not note any significance for this part of the Conservation Area arising from the Green Belt. Further a modern infill house (no.71a) is also visible from the green belt in this location. Modern residential development adjoining the southern and eastern boundaries intervenes between Northumberland Road and the Green Belt limiting the role the parcel plays in the setting and special character of the historic town.

Purpose E – Assisting in urban regeneration:

Equal contribution

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

The parcel does not make a strong contribution to the Green Belt purposes A, B or D and therefore has the potential to be grey belt land. NPPF footnote 7 areas and assets within or connected to the parcel may provide a strong reason for refusing or restricting development within it. Such locations can only be provisionally defined as grey belt land until further relevant and necessary specialist assessment work has been undertaken.

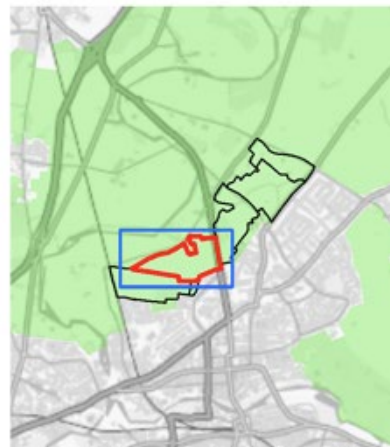
Parcel OMB5



- OMB5
- Neighbouring parcel
- Green Belt

NPPF Footnote 7 designations

- Flood zone 2
- Flood zone 3
- Conservation area



Contribution of land in Parcel OMB5

Parcel OMB5 Assessment Conclusions

Purpose A		Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Strong		Weak	Strong	Weak	Equal	No

Parcel OMB5 Description

Parcel Location, Land Uses and Boundaries
<p>The parcel is located to the north of Royal Leamington Spa and south of Blackdown. The parcel comprises open undeveloped land.</p> <p>There are no significant boundary features to separate the parcel from the settlement. The parcel is separated from the settlement of Royal Leamington Spa via residential property lines largely comprising boundary fencing. To the north, largely hedgerows separate the parcel from Blackdown.</p> <p>There is no significant change in landform to create a sense of separation between the settlement and the parcel. Whilst the ground level declines towards the north this is gradual and does not contribute to any sense of separation.</p> <p>There is some perception of urban development outside of the parcel but this decreases with distance from the urban edge.</p> <p>There is no significant urbanising development or activity in the Green Belt affecting this parcel.</p> <p>There is some perception of connectivity with the wider countryside, limiting the impact of any existing urbanising influence. There is some perception of connectivity to the wider countryside to the west where the ground level increases in landform and neighbouring field boundaries are weak, however, urbanising influence from Royal Leamington Spa, Blackdown and Old Milverton are not entirely absent in this area.</p>

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Strong contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Royal Leamington Spa is a town and so is defined as a large built-up area.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel but this reduces with distance from the urban edge.
Are there physical features in reasonable proximity that could restrict and contain development?	There are no physical features that could restrict and contain development. The parcel has only hedgerow boundaries and intermittent boundary trees, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land. Further, the parcel forms a large part of the gap between Royal Leamington Spa and Blackdown. Any partial development of the parcel would weaken the remainder.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would have an incongruous impact on the urban pattern. The lack of features to restrict and contain development mean that, although the parcel is subject to some urbanising influence, development here would have an incongruous impact. Further, the loss of separation between Royal Leamington Spa and Blackdown causing Blackdown to become part of the large built-up area, would be a significant change to the urban pattern. The openness of this parcel is playing a role in preventing that.

Purpose B: Preventing neighbouring towns from merging:**Weak contribution**

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel lies in a relatively robust gap between Royal Leamington Spa and Kenilworth. Intervening development at Blackdown and Hill Wootton weaken it slightly but the River Avon, high ground around Hill Wootton and tree cover serve to strengthen separation.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
Does the parcel form a substantial, small or very small part of the gap?	The parcel forms a very small part of the gap.
Would development result in loss of visual separation between towns?	Development of land in the parcel would likely have a negligible impact on visual separation between towns.

Purpose C: Assisting in safeguarding the countryside from encroachment:**Strong contribution**

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel but this reduces with distance from the urban edge.
Would development impact adjacent Green Belt land?	Development in the parcel would significantly increase the urbanising influence on adjacent open land. The parcel has only hedgerow boundaries, so development within the parcel would in turn

Assessment Considerations	Assessment
	increase the urbanising impact of development on adjacent open land.

Purpose D: Preserving the setting and special character of historic towns:

Weak contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	Royal Leamington Spa is a historic town and this parcel forms part of its setting.
What is the extent of urbanising development in the parcel?	The parcel is free from urbanising development.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes little or no contribution to the special character of the historic town. Whilst the Green Belt adjoins the town, it is largely experienced in the context of modern development. The parcel adjoins Kenilworth Road and the northern extent of the Royal Leamington Spa conservation area. The ‘mews’ dwellings within this section of the Conservation Area that adjoin the Green Belt are later additions and intervene between the more distinctive historical buildings noted within the appraisal. There is no historical information to inform the role of the Green Belt within the setting being important or significant.

Purpose E – Assisting in urban regeneration:

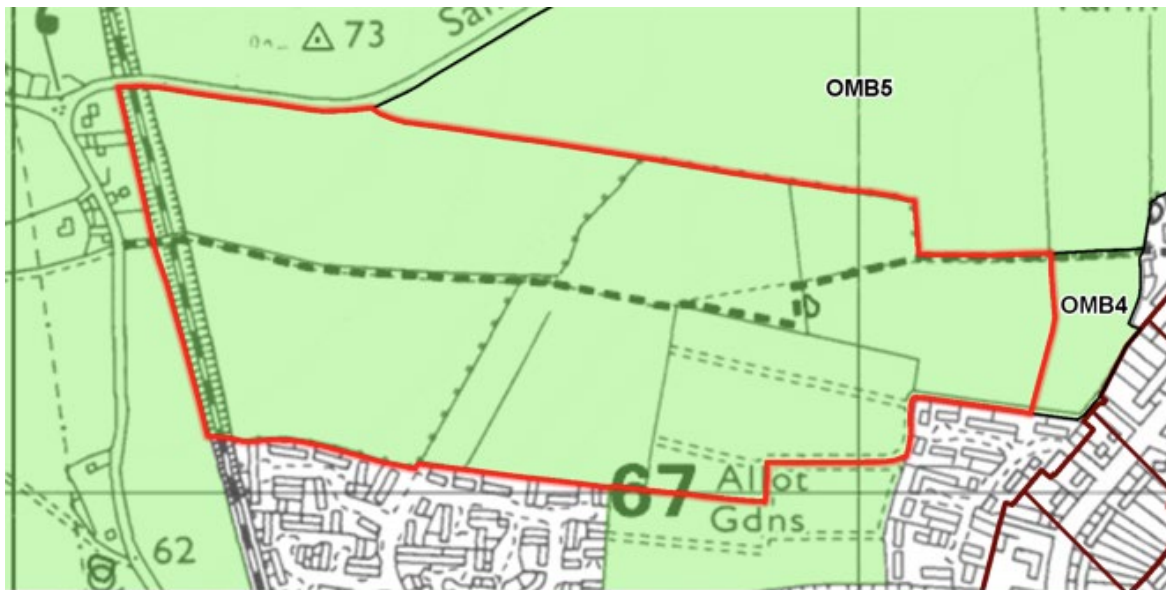
Equal contribution

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

The parcel makes a strong contribution to Green Belt Purpose A and therefore does not meet the definition of Grey Belt.

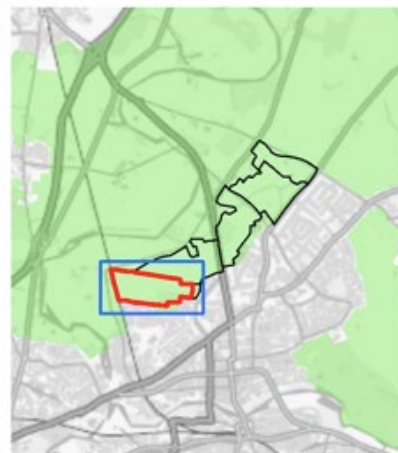
Parcel OMB6



-  OMB6
-  Neighbouring parcel
-  Green Belt

NPPF Footnote 7 designations

-  Conservation area



Contribution of land in Parcel OMB6

Parcel OMB6 Assessment Conclusions

Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Strong	Weak	Strong	Weak	Equal	No

Parcel OMB6 Description

Parcel Location, Land Uses and Boundaries
<p>The parcel is located to the north of Royal Leamington Spa. The railway line forms the western edge of the parcel of OMB6 and Old Milverton lies to the north-west. The parcel comprises open undeveloped land and allotments.</p> <p>There are no significant boundary features to separate the parcel from the settlement. The parcel is separated from the settlement by residential property lines creating a weak sense of separation.</p> <p>There is no significant change in landform to create a sense of separation between the settlement and the parcel. The ground level within the parcel rises towards the north-west however, this is gradual and only rises above the settlement in part. The majority of the parcel lies at an elevation similar to the residential development of Royal Leamington Spa negating the sense of separation.</p> <p>There is some perception of urban development outside of the parcel, adjacent to its southern and eastern edges.</p> <p>There is no significant urbanising development or activity in the Green Belt affecting this parcel. Whilst the parcel features an allotment which has some association with the urban area the parcel is predominantly open undeveloped land.</p> <p>There is some perception of connectivity with the wider countryside, limiting the impact of any existing urbanising influence.</p>

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Strong contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Royal Leamington Spa is a town and so is defined as a large built-up area.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Are there physical features in reasonable proximity that could restrict and contain development?	There are no physical features that could restrict and contain development. The parcel has only hedgerow boundaries and intermittent boundary trees, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land. Further, the western extent of the parcel forms the strongest part of the gap between Royal Leamington Spa and Old Milverton. Any partial development of the parcel would weaken the remainder.
Would development form an incongruous pattern in relation to the large built-up area?	Development of land in the parcel would have an incongruous impact on the urban pattern. The lack of features to restrict and contain development mean that, although the parcel is subject to some urbanising influence, development here would have an incongruous impact. Further, the loss of separation between Royal Leamington Spa and Old Milverton causing Old Milverton to become part of the large built up area, would be a significant change to the urban pattern. The openness of this parcel is playing a role in preventing that.

Purpose B: Preventing neighbouring towns from merging:**Weak contribution**

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel lies in a relatively robust gap between Royal Leamington Spa and Kenilworth. Intervening development at Blackdown and Hill Wootton weaken it slightly but the River Avon, high ground around Hill Wootton and tree cover serve to strengthen separation.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
Does the parcel form a substantial, small or very small part of the gap?	The parcel forms a very small part of the gap and lacks any strong separating features.
Would development result in loss of visual separation between towns?	Development of land in the parcel would likely have a negligible impact on visual separation between towns.

Purpose C: Assisting in safeguarding the countryside from encroachment:**Strong contribution**

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
What is the extent of urbanising influence from outside the parcel?	There is some urbanising influence associated with development outside of the parcel.
Would development impact adjacent Green Belt land?	Development in the parcel would significantly increase the urbanising influence on adjacent open land. The parcel has only hedgerow boundaries, so development within the parcel would in turn

Assessment Considerations	Assessment
	increase the urbanising impact of development on adjacent open land.

Purpose D: Preserving the setting and special character of historic towns:

Weak contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	Royal Leamington Spa is a historic town and this parcel forms part of its setting.
What is the extent of urbanising development in the parcel?	The parcel is predominantly free from urbanising development.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes little or no contribution to the special character of the historic town. Whilst the Green Belt adjoins the town its relationship is principally with modern development and has no distinctive characteristics that contribute significantly to historic setting and special character.

Purpose E – Assisting in urban regeneration:

Equal contribution

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

The parcel makes a strong contribution to Green Belt Purpose A and therefore does not meet the definition of Grey Belt.

References

- 1 These figures are derived from MHCLG Local Authority Green Belt Statistics in 2010 to 2011 and 2024 to 2025 respectively:
<https://www.gov.uk/government/collections/green-belt-statistics>
- 2 Report to Warwick District Council by Ken Ward BA (Hons) MRTPI Date 28th July 2017 Report on the Examination of the Warwick District Local Plan:
https://www.warwickdc.gov.uk/downloads/file/4479/inspectors_report_final
- 3 Ministry of Housing Communities and Local Government (2025) Planning Practice Guidance (PPG), Available at:
<https://www.gov.uk/government/collections/planning-practice-guidance>
- 4 Footnote 55 of the National Planning Policy Framework (December 2024) Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 5 LUC (June 2015). Coventry & Warwickshire Joint Green Belt Study Stage 1
- 6 LUC (April 2016). Coventry & Warwickshire Joint Green Belt Study Stage 2
- 7 NPPF definition of ‘Habitat Site’: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.
- 8 NPPF definition of ‘Heritage Asset’: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
- 9 Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.
- 10 The Court of Appeal decision in *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes. This ruling was reinforced in 2025 by *Mole Valley DC v SSHCLG* [2025] EWHC 2127 (*Admin*) which confirmed the approach to the current recent iteration of the NPPF (and subsequent ‘grey belt’) remains the same.

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- 11 The Court of Appeal decision in *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes. The judgement of *Mole Valley DC v SSHCLG* [2025] EWHC 2127 (*Admin*), confirmed this applies to development under the post-2024 iterations of the NPPF and Paragraph 155 'grey belt' test.
 - 12 Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.
 - 13 Planning Inspectorate, David Smith, Report to the Council of the London Borough of Redbridge regarding the Examination of the Redbridge Local Plan 2015-2030 (January 2018). Available at: <https://www.redbridge.gov.uk/media/4732/redbridge-local-plan-inspectors-report.pdf>

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