

File Note

Old Milverton and Blackdown Parish Council Green Belt Assessment

Sender

LUC

Recipient(s)

Old Milverton and Blackdown Joint Parish Council

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Introduction

This note explains the reasons for the differing conclusions reached by two separate Green Belt assessments relating to land south and south-east of Sandy Lane and Old Milverton Lane, and south-west of Westhill Road on the edge of Leamington Spa within Warwick District.

LUC was commissioned by Old Milverton and Blackdown Joint Parish Council to undertake an independent assessment of Green Belt land within a defined area of the parish. The findings were published in April 2026. The assessment evaluated the contribution of the land to the five Green Belt purposes set out in the National Planning Policy Framework (NPPF, December 2024). It also considered whether individual parcels could be classified as grey belt in accordance with the national definition and associated Planning Practice Guidance (PPG) published in February 2025.

Arup was commissioned by Warwick District Council and Stratford-on-Avon District Council to undertake a Green Belt Review to inform the evidence base underpinning the emerging South Warwickshire Local Plan (SWLP). The review comprises two stages. The updated Stage 1 Report (April 2026) provides an independent assessment of the contribution made by those parts of the West Midlands Green Belt within South Warwickshire to the five Green Belt purposes set out in the NPPF. The Stage 2 Report (May 2026) builds on the Stage 1 findings by assessing the contribution made by individual development sites being considered for removal from the Green Belt through the SWLP process.

The two assessments reach different conclusions regarding the study area. The LUC assessment concludes that the majority of the land makes a strong contribution to Green Belt Purpose A and, with the exception of one parcel, does not meet the definition of grey belt. In contrast, the Arup assessment concludes that all of the land within the study area constitutes grey belt. The differences in the conclusions arise primarily from variations in assessment methodology and parcel definition, rather than a fundamental disagreement regarding the characteristics of the land. The following section therefore examines the principal reasons why the assessments have produced different outcomes. As the key distinction between the studies relates to the assessment of Purpose A (checking the unrestricted sprawl of large built-up areas), and this is the primary factor driving the

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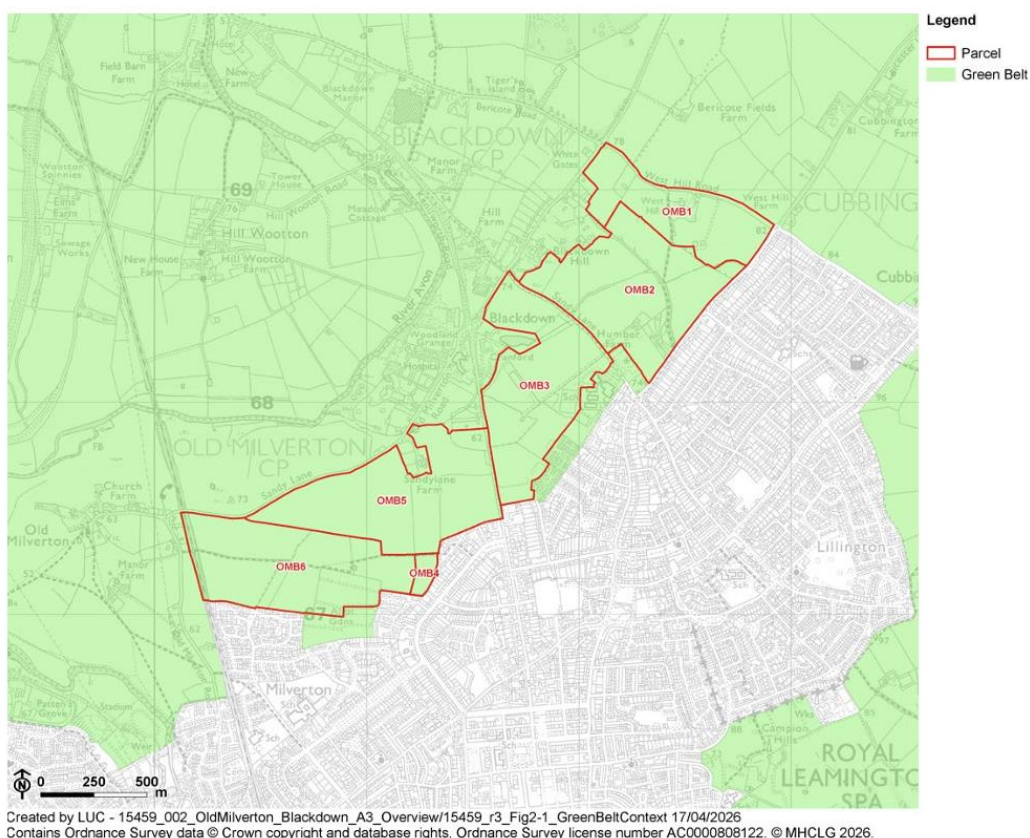


differing grey belt conclusions, particular focus is given to this purpose. Comparisons of the assessments against Purposes B, C and D are also provided where they help explain the variation in overall findings.

LUC study parcel results

LUC identified six Green Belt parcels within the study area (see Figure 1 below).

Figure 1: LUC Study Area Extent and Parcels (taken from LUC study April 2026)



LUC's approach to parcelling, does not predefine parcels but instead uses an analysis process to identify variations in contribution to the NPPF Green Belt 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. Each parcel was assessed against all five Green Belt purposes and contribution levels were rated as strong, moderate or weak, using the illustrative criteria set out in the PPG.

The assessment concludes that almost all of the study area (with the exception of OMB4) 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). No parcel makes a strong contribution to Purpose B (preventing neighbouring towns from merging) and no parcel makes more than a weak contribution to Purpose D (preserving the setting and special character of historic towns). On this basis, five of the six parcels are assessed as not being grey belt. 'Grey belt' is defined 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.

Only one parcel (OMB4) which shows moderate or weak contributions across Purposes A, B and D (because it is relatively contained by existing development and infrastructure) is provisionally identified as grey belt. A summary of the contribution ratings of each of the six parcels is provided below.

Table 1: Contribution of Parcels to NPPF Purposes and identification of Grey Belt (taken from LUC study Chapter 4 Assessment Findings)

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

Purpose A - checking the unrestricted sprawl of large built-up areas

For Purpose A, five of the parcels make a strong contribution to checking the sprawl of the large built-up area of Leamington Spa. 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. 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. The study also notes that Blackdown is in close proximity to Leamington Spa so any expansion into the gap between the two, weakening Blackdown's sense of distinction from the large built-up area, would be perceived as an incongruous impact on the urban pattern.

Purpose B - preventing neighbouring towns from merging

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, there is scope for some degree of development that wouldn't result in the perceived merger of towns. The moderately performing parcels have a greater contribution to this purpose as they lie adjacent to roads which link the towns, and where development in the Green Belt could weaken the wider gap.

Purpose C - safeguarding the countryside from encroachment

With the exception of Parcel OMB4, all play a strong role in relation to preventing encroachment on the countryside.

Purpose D - preserving the setting and special character of historic towns

The parcels are all considered to be near to the historic town of Royal Leamington Spa. 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.

Arup study parcel results

The Arup parcels covering the same area as the LUC study can be seen in Figures 2a Figure 2b (zoomed in).

Figure 2a: Arup study area (Contribution to Purpose A map used, taken from Arup Stage 1 report April 2026)

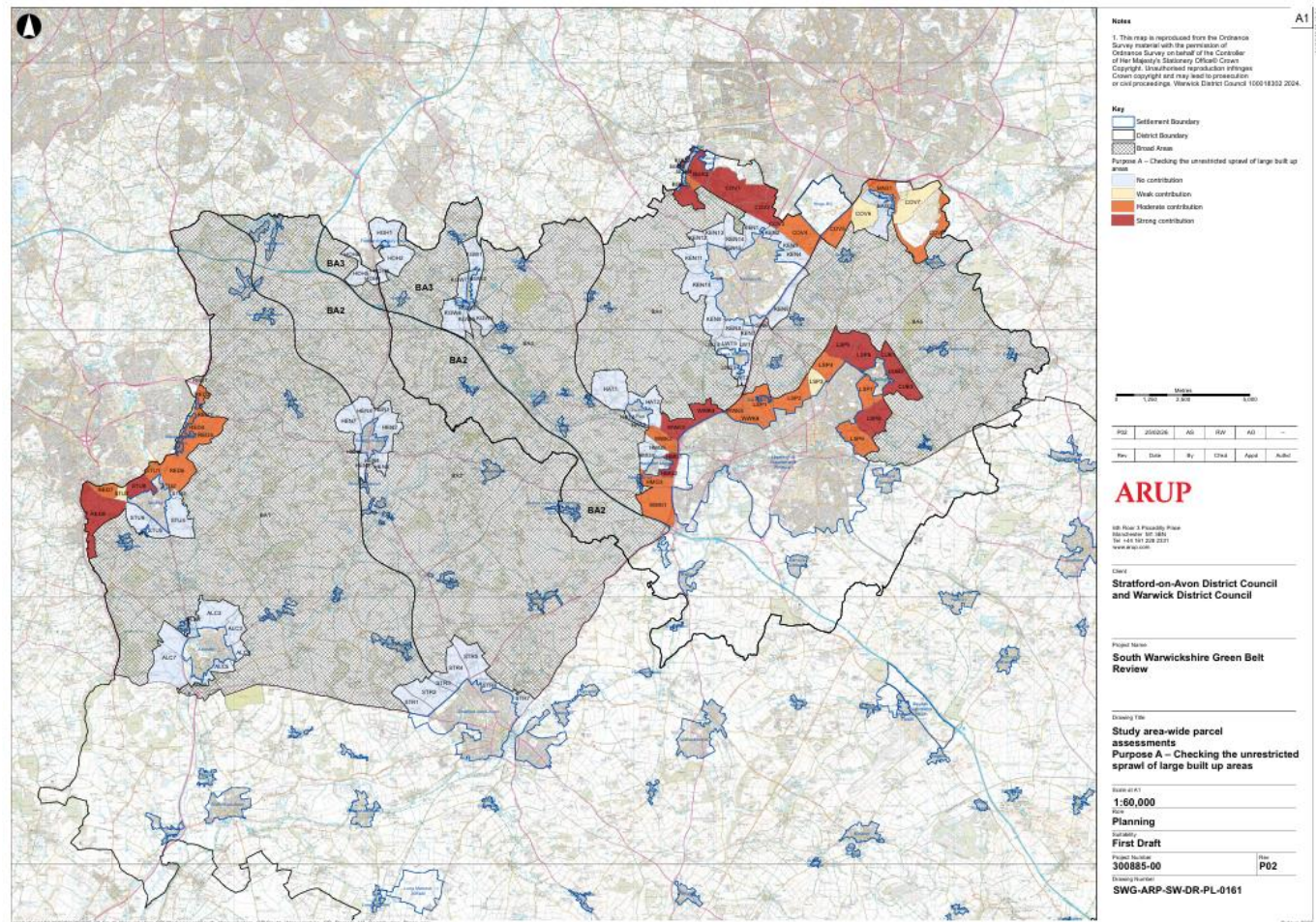
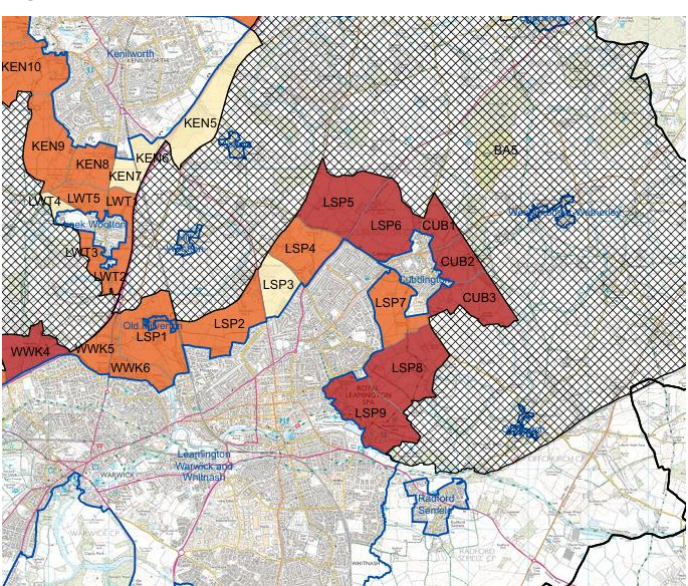


Figure 2b: Zoomed in, Contribution to Purpose A map used, taken from Arup Stage 1 report April 2026



The parcels in the Arup study area (that coincide with the study area of the LUC assessment) are labelled LSP2, LSP3 and LSP4. The Arup methodology involves pre-defining Green Belt 'parcels' around the main urban areas and inset settlements before the assessment is then undertaken. Existing boundary features are used as a basis for defining parcels. The summary table below shows the conclusion for each parcel within the study area.

Table 2: Summary of Arup parcel ratings

Arup Parcel	Purpose A	Purpose B	Purpose C	Purpose D	Grey Belt	Grey Belt
LSP2	Moderate	Weak	Moderate	Moderate	Moderate (Equal)	Yes
LSP3	Weak	Weak	Weak	Weak	Moderate (Equal)	Yes
LSP4	Moderate	Weak	Moderate	No contribution	Moderate (Equal)	Yes

The full text for the assessment outcomes taken from the Arup Stage 1 report can be found in Appendix 3.

Purpose A - checking the unrestricted sprawl of large built-up areas

The Arup Study states that LSP2 and LSP4 make a moderate contribution to Purpose A and that LSP3 makes a weak contribution to this purpose. The assessment considers 4 key factors in assessing Purpose A (page 31 of Arup Stage 1 report (2026)):

1. Is the parcel of adjacent to the large built-up area?
2. Is the parcel free from development and considered to be open?
3. A) Is there an existing defensible boundary between the large built-up area and the parcel/broad area which could prevent sprawl? and (B) Is there an existing defensible boundary between the parcel/broad area and the countryside which could contain potential development and prevent future encroachment?
4. Connection to built-up area: (A). Is the parcel/broad area well connected to the built-up area along a number of boundaries? And (B) Is there a risk of sprawl or could development of the parcel/broad area constitute 'rounding off' of the built-up area?

All parcels are concluded to be adjacent to the large built-up area.

All parcels are concluded to be predominately open – although there is reference to existing sprawl within LSP2 and LSP4 (including the Nuffield Health Warwickshire Hospital in LSP2, and residential and agricultural uses and Plymouth Brethren Christian Church in Parcel LSP4). It also notes there is some evidence of existing sprawl within LSP3, which consists of residential and recreational uses, as well as the North Leamington School.

The assessment states there are no strong existing boundaries between parcels LSP2 and LSP3 and the large built-up area to prevent sprawl. For LSP4 it notes that there are defensible boundaries between the parcel and the large built-up area consisting of the A445 Leicester Lane to the southeast and part of Sandy Lane to the southwest, which it suggests could contain potential development and prevent sprawl. In relation to boundaries on the outer edge of the parcels, it notes that there are defensible boundaries consisting of a railway line to the west, Sandy Lane/Old Milverton Lane to the north, Stoneleigh Road, Westhill Road and the A452, which could contain potential development and prevent future sprawl.

Finally, the assessment notes that all three parcels are connected to the large built-up area along only one boundary and development would not constitute rounding off, and therefore there is a risk of sprawl.

Purpose B - preventing neighbouring towns from merging

All parcels are stated to make a weak contribution. The parcels are considered to be part of the gap between Leamington Spa and Kenilworth. The parcels are considered to form part of a less essential gap between neighbouring towns which is of a sufficient scale that development is possible without any risk of merging.

Purpose C - safeguarding the countryside from encroachment

LSP2 and LSP4 are considered to be agricultural land and farm buildings predominantly but connected to Leamington Spa along the southern boundary and southeastern boundary respectively. LSP2 is considered to have boundaries that are defensible that could contain potential development including the railway line, Sandy Lane and the A452. LSP4 is connected to the countryside through defensible boundaries including Sandy Lane, Stoneleigh Road and Westhill Road which could contain potential development.

LSP3 is considered to contain built development which has a moderate-weak degree of openness. The parcel is connected Leamington Spa nominally and the town has sprawled into the parcel from the southeast along the boundary. The boundaries would not be able to prevent encroachment but is connected to the countryside through defensible boundaries.

There do appear to be some direct contradictions in the Arup assessment for example parcel LSP2 states under Purpose A that *“The existing boundary between the parcel and the large built-up area is a less defensible boundary consisting of field boundaries and residential back gardens, which would not be able to prevent sprawl.”* However in the assessment of Purpose C it states *“The parcel is connected to Leamington Spa along its southern boundary, consisting of the relatively regular rear boundaries of residential properties. This is a predominantly defensible boundary which would be able to prevent encroachment.”*

Purpose D

Assessment notes that: LSP2 is partly within the 250m buffer of Leamington Spa Conservation Area, at its eastern end north of Northumberland Road. It concludes it makes a moderate contribution to the setting and special character of the historic town.

LSP3 is partly within the 250m buffer of Leamington Spa Conservation Area but is otherwise largely separated from the Conservation Area by extensive modern built development, and it therefore has a weak role and contribution to preserving the setting and special character of the historic town.

LSP4 is not located within 250m of a relevant Conservation Area and therefore it states there is no contribution to Purpose D.

Discussion of results

The parcels in both the LUC and Arup assessment broadly cover the same area, although the Arup Parcels do include a number of additional areas as set in Table 3.

Table 3: Defined parcel comparison

Arup Parcel	Additional areas included in Arup parcel	LUC Parcel equivalent
LSP2	Allotments to south, Scrub land (OMB4), Residential property to north and Nuffield Heath Warwickshire hospital	OMB4, OMB5, OMB6
LSP3	Residential dwellings and North Lemington School	Part of OMB3
LSP4	Plymouth Brethren Church, Blackdown Hall and other residential properties to north of parcel	OMB1 and OMB2

Purpose A

The variation in the grey belt conclusions between the parcels is primarily attributable to differences in the Purpose A contribution ratings. In the LUC study, all parcels except OMB4 are assessed as making a Strong contribution to Purpose A, whereas no parcels are assessed as making a Strong contribution in the Arup study. There are two key differences that can account for the difference in the assessment of Green Belt performance for Purpose A:

1. **Assessment of openness:** The Arup parcels include the additional areas identified in Table 1, which has influenced the assessment of the second Purpose A Arup criterion relating to openness and freedom from development. As a result, this criterion is generally assessed as making a moderate contribution in the Arup study, rather than a strong contribution as

concluded by LUC. This reflects a methodological difference between the two assessments. Arup defines parcels using physical features, whereas LUC does not predefine parcels and delineates parcels to reflect variations in Green Belt performance. It is likely that the Arup assessment outcomes would differ if the LUC parcels had been used within the Arup methodology, as these parcels generally contain little or no development and are characterised by a high degree of openness. By incorporating the additional developed areas identified in Table 1, the Arup parcels include a mixture of open and developed land, which effectively dilutes the overall assessment of openness across the parcel. In this respect, the Arup assessment results in an 'averaging' of Green Belt performance. LUC has separately assessed the additional areas identified in Table 1 and agrees that many of these developed or previously developed areas could be potential grey belt. However, LUC does not consider that the presence of these areas is sufficient to justify applying a grey belt conclusion to the entirety of the larger Arup parcels, given the substantial areas of open and largely undeveloped land that they also contain which would play a key role in preventing sprawl. LUC's approach is directly in line with the PPG which stated *"to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to the Green Belt purposes"*.

It is also not clear from the Arup methodology what is treated as built development and whether development that is not inappropriate within the Green Belt (eg farm buildings etc) has been excluded as having an impact on openness. It would appear from the assessment text (eg LSP4) that agricultural uses are treated as 'sprawl' and therefore are considered to affect openness, which is contrary to NPPF para 154.

2. **Presence of defensible boundaries:** The second key factor that appears to have led to a difference in the ratings for Purpose A, is that the Arup assessment states that there are defensible boundaries on the outer edge of the parcels which could contain potential development and prevent future sprawl. It notes that these defensible boundaries consist of a railway line to the west, Sandy Lane/Old Milverton Lane to the north, Stoneleigh Road, Westhill Road and the A452, which could contain potential development and prevent future sprawl. LUC agrees that the railway line forms a strong and enduring physical boundary that would help contain development to the west. However, LUC does not consider Sandy Lane, Old Milverton Lane or Stoneleigh Road to represent equally robust defensible boundaries. These are minor roads which do not provide the same degree of permanence or containment as strategic infrastructure such as a railway line. Furthermore, development already extends beyond these roads in several locations, reducing their effectiveness in defining a clear and permanent edge to the urban area. As a result, LUC considers that reliance on these roads as containment features overstates their ability to prevent further encroachment into the countryside. The presence of development beyond these boundaries also weakens the argument that they would provide a logical or defensible limit to future growth, and therefore does not materially reduce the parcel's contribution to Green Belt Purpose A. Consequently, while both assessments acknowledge the role of existing boundary features, LUC considers that the ability of these boundaries to contain development has been overstated in the Arup assessment, contributing to a lower Purpose A rating than would otherwise be justified. The LUC assessment also considers that sprawl within the parcels has the potential to merge the separate settlements of Blackdown and Leamington Spa which would result in an incongruous impact on the urban form.

Notwithstanding the differences in the overall Purpose A ratings, both studies reach a similar conclusion regarding the relationship of the parcels to the existing urban area. Both identify that the parcels are not well contained and that development would not constitute a logical rounding-off of the settlement edge. As noted in the Arup assessment, "development would not constitute rounding off, and therefore there is a risk of sprawl". This is consistent with LUC's conclusion that development of these parcels would be incongruous and contribute to sprawl.

For Purposes B–D, there is a greater degree of consistency between the LUC and Arup assessments, although some differences remain.

Purpose B

For Purpose B (to prevent neighbouring towns from merging into one another), Both studies recognise that the land forms part of the gap between Royal Leamington Spa and Kenilworth and conclude that there is a limited risk of coalescence between the two settlements.

The Arup assessment concludes that all parcels make a Weak contribution to Purpose B, on the basis that they form part of a relatively wide and resilient gap between the settlements, such that development could occur without resulting in the physical merging of neighbouring towns.

Similarly, the LUC assessment identifies the gap between Royal Leamington Spa and Kenilworth as relatively robust, with the River Avon, intervening topography and areas of tree cover contributing to both physical and visual separation. However, LUC distinguishes between parcels within the study area, assessing OMB4, OMB5 and OMB6 as making a Weak contribution, and OMB1, OMB2 and OMB3 as making a Moderate contribution. The higher rating reflects the location of these parcels adjacent to key transport corridors linking the settlements, where development could erode perceptions of separation and incrementally weaken the wider strategic gap. As such, while the overall conclusions are broadly aligned, LUC identifies a slightly stronger contribution to Purpose B for those parcels located adjacent to the principal routes between the two settlements.

Purpose C

For Purpose C (to assist in safeguarding the countryside from encroachment), a more notable variation is evident. LUC assesses OMB1, OMB2, OMB3, OMB5 and OMB6 as making a Strong contribution and OMB4 as making a Moderate contribution. In contrast, Arup assesses the equivalent larger parcels as making either a Moderate contribution (LSP2 and LSP4) or a Weak contribution (LSP3). As with Purpose A, this appears to reflect the inclusion of developed land within the larger Arup parcels, which reduces the overall perception of openness and countryside character when assessed at the parcel scale.

A key component of the Arup assessment is the consideration of the percentage of built development within each parcel. While this provides an indication of the degree of urban influence, the results can be significantly affected by the definition of parcel boundaries. The inclusion of developed areas within larger parcels increases the percentage of built form and can therefore reduce the overall contribution attributed to safeguarding the countryside from encroachment, even where substantial parts of the parcel remain open. Consequently, the assessment of built development is a product of the parcelisation methodology adopted. LUC considers that the more open and undeveloped areas continue to make a stronger contribution to safeguarding the countryside from encroachment than is reflected in the Arup assessment.

As with Purpose A, LUC considers that agricultural buildings etc should not be treated as built development as they are not inappropriate development within the Green Belt and cannot be considered to affect openness.

Purpose D

For Purpose D (to preserve the setting and special character of historic towns), both assessments conclude that the parcels make a relatively limited contribution. LUC assesses all parcels as making a Weak contribution, while Arup assesses LSP2 as Moderate, LSP3 as Weak and LSP4 as making No Contribution. Although there is some variation in ratings, neither assessment identifies the land as making a significant contribution to this Green Belt purpose, and therefore these differences have limited influence on the overall conclusions.

Conclusion

Overall, the differing grey belt conclusions reached by LUC and Arup are primarily a consequence of differences in parcel definition and assessment methodology, rather than substantial disagreement regarding the characteristics of the land. The Arup assessment applies larger parcels defined by physical boundaries, incorporating areas of existing development and previously developed land that reduce the overall assessment of openness and Green Belt performance. In contrast, LUC has differentiated between land with varying Green Belt contribution (as per the requirements of the PPG) and assessed smaller parcels accordingly. While LUC agrees that some of the additional developed areas included within the Arup parcels exhibit grey belt characteristics, it does not consider that these characteristics extend across the entirety of the larger parcels. Furthermore, LUC does not agree that all of the boundaries relied upon in the Arup assessment provide strong or enduring containment capable of limiting future sprawl. Notwithstanding these differences, both studies agree that the parcels are not well contained, that development would not constitute rounding off of the settlement edge, and that development would result in an incongruous impact. The principal area of difference therefore relates to the extent to which the inclusion of developed land, the type of built development and the presence of boundary features should influence the overall Purpose A assessment and subsequent grey belt classification.

Stage 2 report

The Stage 2 Arup report follows on from Stage 1 by assessing the contribution to the Green Belt made by individual development sites being considered for removal from the Green Belt in the South Warwickshire Local Plan.

Figure 3 shows the potential allocated sites within the study area. Regarding Purpose A the report notes that Leamington Spa, Warwick and Whitnash is a large built-up area, and if SG06-01, SG06-02 and SG06-03 were all allocated together this would result in a degree of cumulative outward sprawl to the north of the large built-up area. However, all three sites are considered by Arup to be contained within defensible boundary features and it is therefore considered that the cumulative overall harm resulting from this would be moderated. The report concludes that whilst the development of these sites would expand the settlements to which they are adjacent, they would not result in new isolated incursions into the Green Belt. Given this, and the lack of significant identified cumulative implications for Purpose A or Purpose B, it is not considered that wider fundamental harm would occur as a result of the development of this cluster of sites.

The LUC assessment also concludes that 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.

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.

Figure 3: Arup Stage 2 Sites (taken from Figure 5 of the Arup Stage 2: Green Belt Site Assessment, May 2026)

