



## Brandon, Rugby

### Green Belt Technical Note

On behalf of **Tarmac**



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## Document Control Sheet

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Contents

1.1 Introduction.....

1.2 Policy Council Green Belt Assessment.....

1.3 Contribution of the Site to the Green Belt.....

1.4 Design Considerations.....

1.5 Summary.....

Figures

- Figure 1: Extent of the greenbelt in Stage 1 and Stage 2 Local Authorities.
- Figure 2: Parcel RD4 and local constraints and context.
- Figure 3: Overall assessment rating for parcels

Tables

- Table 1: Joint Green Belt Study Appendix 2 findings for Parcel RD4.
- Table 2: Stantec Green Belt Assessment Findings for the Site

Appendices

- Appendix 1: LVIA GBR Methodology
- Appendix 2: Opportunities and Constraints

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# Green Belt Technical Note

## 1.1 Introduction

1.1.1 This Technical Note addresses existing published Green Belt evidence relevant to land at Brandon ('the Site'), within the administrative boundary of Rugby Borough Council, and provides an assessment of the contribution the Site makes to the purposes of the Green Belt, as set out in Paragraph 143 of the National Planning Policy Framework (NPPF):

***“(a) to check the unrestricted sprawl of large built-up areas;***

***(b) to prevent neighbouring towns merging into one another;***

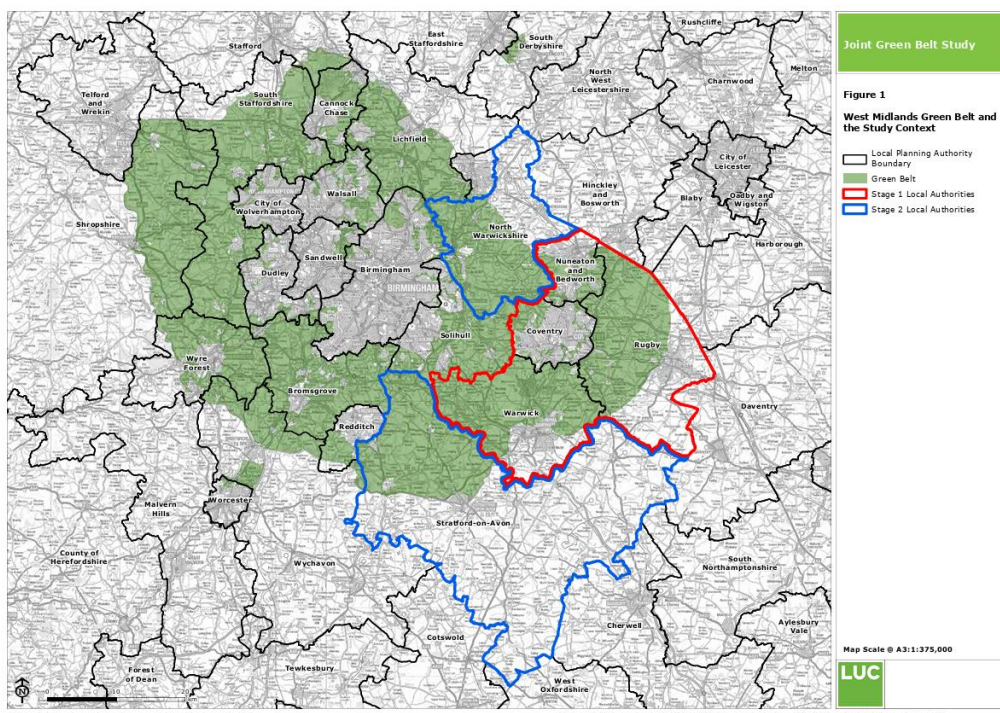
***(c) to assist in safeguarding the countryside from encroachment;***

***(d) to preserve the setting and special character of historic towns; and***

***(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”***

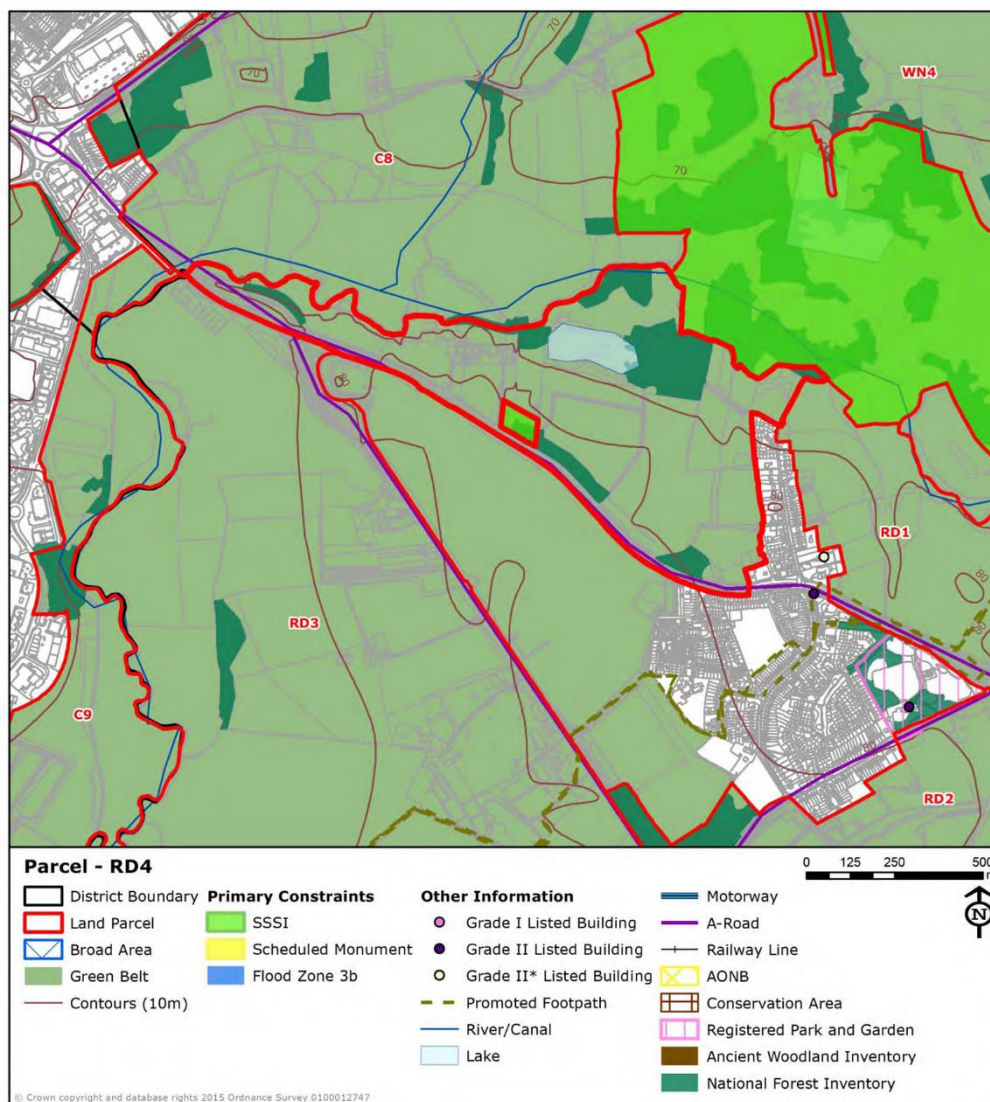
1.1.2 The Site lies in the Green Belt which “*is part of the larger West Midlands Green Belt*”<sup>ii</sup>. LUC were commissioned by the following councils to work on the Joint Green Belt Study; Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council. The Green Belt study took place in 2 stages.

- Stage 1: “Assessed the Green Belt within Coventry City, Nuneaton and Bedworth Borough, Rugby Borough and Warwick District”; and
- Stage 2: Assessed “the Green Belt within North Warwickshire Borough and Stratford-on-Avon District towards the end of 2015”.



**Figure 1: Extent of the greenbelt in Stage 1 and Stage 2 Local Authorities.**

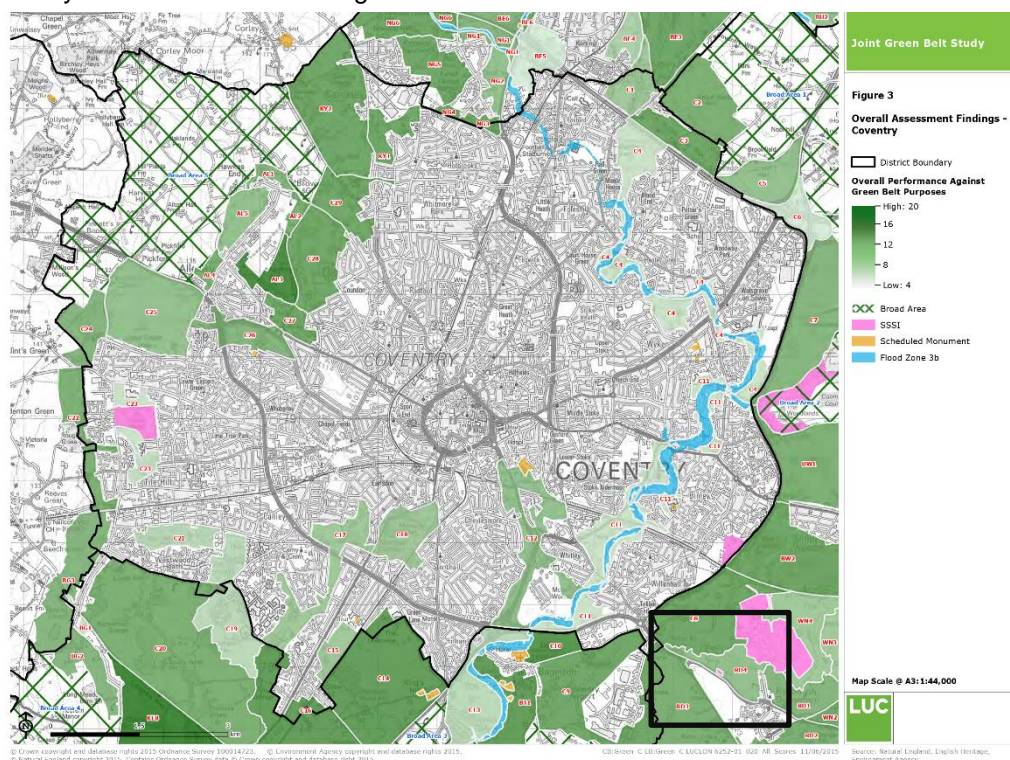
- 1.1.3 Stages 1 and 2 judge the parcels' contribution to the purposes of Green Belt according to the five purposes of the Green Belt outlined in the NPPF 2023. The detailed methodology employed in the Green Belt Assessment Stages 1 and 2 are set out on Pages 8 to 16 of The Joint Green Belt Study Stage 1.
- 1.1.4 The report also states that for changes to be made to the Green Belt as outlined in the NPPF there should be:
- “Demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and*
  - Consideration of the need to promote sustainable patterns of development, considering a range local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.”*
- 1.1.5 According to the Stage 1 report, the Site lies in parcel RD4 see Figure 2 below.



**Figure 2: Parcel RD4 and local constraints and context.**



- 1.1.6 The Stage 2 assessment considers the contribution Parcel RD4 makes against the Green Belt purposes, Figure 3 below illustrates the overall performance of the Parcels that surround Coventry with Parcel RD4 scoring on the lower end of the scale.



**Figure 3: Overall assessment rating for parcels**

**Table 1: Joint Green Belt Study Appendix 2 findings for Parcel RD4<sup>iii</sup>.**

Green Belt Purpose	Issue	Assessment	Score
Purpose 1: to check the unrestricted sprawl of large built-up areas	1a: Ribbon Development	<i>"Ribbon development has not and is unlikely to occur along the dual carriageway that follows the southern border of the parcel. However, the parcel plays some role in preventing ribbon development along Redland Lane."</i>	1/2
	1b: Openness	<i>"The thin strip of land in the western half of the parcel in between London Road and the River Avon contains an open air construction and demolition recycling facility and associated buildings, many of which are derelict. In addition, the western part of the parcel contains a sewage treatment works. The buildings associated with these land uses have compromised the openness of the Green Belt in the western half of the parcel; however, the eastern half of the parcel is free from development, being made up of open arable fields."</i>	1/2
			2/4

Green Belt Purpose	Issue	Assessment	Score
Purpose 2: to prevent neighbouring towns from merging into one another	2a: Location of parcel and distance between neighbouring settlements	<i>"Measured from the junction of London Road and Oxford Road at the western end of the parcel, the parcel plays a separating role in preventing the new industrial estate adjacent to Ryton on Dunsmore from merging with Coventry roughly 650m to the north west."</i>	4/4
Purpose 3: To assist in the safeguarding of the countryside from encroachment	3a: Significance of existing urbanising influences	<i>"The thin strip of land in the western half of the parcel in between London Road and the River Avon contains an open air construction and demolition recycling facility and associated buildings, many of which are derelict. In addition, the western part of the parcel contains a sewage treatment works. The buildings and hardstanding associated with these land uses represent urbanising influences on the Green Belt and thus act as encroachment of the countryside in the western half of the parcel; however, the eastern half of the parcel is free from urbanising influences being made up of open arable fields."</i>	1/2
	3b: Significance of boundaries / features to contain development and prevent encroachment	<i>"This relatively thin strip of Green Belt is follows London Road (a dual carriage way) at its southern boundary and the River Avon at its northern boundary. Both of these boundaries are significant in preventing future encroachment of the Green Belt immediately to the north and south of the parcel. Furthermore, these boundaries meet at the westernmost point of the parcel, preventing further encroachment of the countryside to the west."</i>	0/2
			1/4
Purpose 4: To preserve the setting and special character of historic towns	4a: Parcel forms an historical and/or visual setting to the historic town	<i>"The parcel does not overlap with a Conservation Area within an historic town. In addition, there is no intervisibility between the historic core of a historic town and the parcel."</i>	0/4



Green Belt Purpose	Issue	Assessment	Score
Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land	5a: The need to incentivise development on derelict and other urban land within settlements	<p><i>"All parcels make an equally significant contribution (+4) to this purpose. All Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites.</i></p> <p><i>The Local Authorities involved in this review are covered by the Coventry and Warwickshire Housing Market Area (HMA). Defining the area as an HMA reflects the key functional linkages that operate between where people live and work and the household demand and preferences that define the area. As the whole Housing Market Area functions as one unit, this makes it difficult to accurately assess whether one individual parcel considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. What can be said is that all parcels make an equally significant contribution to this purpose and are each given a score of 4."</i></p>	4/4
Total			11/20

1.1.7 A rating out of 4 was assigned to each green belt purpose with 0 as a result of little to no contribution to the purpose and 4 having a strong contribution to the overall purpose (Table 3.2 in the Joint Green Belt Assessment, p17). As demonstrated in Figure 3 above, a score rating of 4 is classed as having a Low contribution to the purposes of the Green Belt, 12 is Medium and 20 is High. Parcel RD4 is outlined in black.

1.1.8 As a result of the assessment, the overall contribution of Parcel RD4 to the purposes of the Green Belt scored 11 out of 20 placing the parcel in the "Mid-Performing" category (see para 4.22 in the Joint Green Belt Assessment). Purposes 1, 3 and 4 all had low scores of 0 or 1 and Purpose 5 was given a default scoring of 4, Purpose 2 (to prevent neighbouring towns from merging into one another) was given the highest scoring of 4 out of 4. In relation to this, the assessment states "it should be noted, however, that an overall score can mask the significant contribution of a parcel to a single Green Belt purpose, or a relatively poor performance across a number of purposes".

## 1.2 Contribution of the Site to the Green Belt

1.2.1 The findings of the Joint Green Belt study based on the assessment dated 2015 and reflect a larger area of land and are not considered to be representative of the Site itself. The Site currently occupies the majority of the eastern half of Parcel RD4. As a result, an assessment specific to the Site has been undertaken by Stantec, with the findings set out in Table 2 below. In order to allow a direct comparison with the findings of the published evidence, the below assessment follows the methodology and language employed in the Joint Green Belt Assessment.

### Note on the Contribution to Purpose 5

1.2.2 With respect to the fifth purpose of the Green Belt - "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" - the Site is not considered derelict or other urban land, and should it be brought forward for development, noting this would not prejudice derelict or other urban land being brought forward for urban regeneration. Notwithstanding this, the principle of retaining land within the Green Belt holds true for all areas

within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt.

- 1.2.3 The methodology employed by the Joint Green Belt Assessment acknowledges this and assigns a default scoring of 4 to all parcels assessed. This raises problems with the methodology relating to the overall assessment of parcels, whereby the judgements for each of the five purposes are combined to arrive at a judgement of the overall contribution made by each parcel to the Green Belt. Given the blanket judgement for Purpose 5 for all parcels, the methodology precludes the possibility of arriving at an overall judgement of no contribution for any parcel.
- 1.2.4 Despite this inconsistency, Stantec's Green Belt Assessment continues to follow the methodology of the published assessments in order that they may be compared at each level. Otherwise, Stantec LVIA GBR Methodology (see Appendix 1), no specific assessment would be undertaken as the Site's contribution to Purpose 5 would be the same as all other land parcels being assessed.

**Table 2: Stantec Green Belt Assessment Findings for the Site**

Green Belt Purpose	Issue	Assessment	Score
Purpose 1: to check the unrestricted sprawl of large built-up areas	1a: Ribbon Development	The Site lies adjacent to existing development along the eastern boundary (settlement of Ryton-on-Dunsmore), southern boundary (logistics and industrial sheds) and western boundary (open air storage facility). As a result, the Site effectively forms a gap between existing development along the A45 and does not contribute towards ribbon development. Furthermore, development of the Site will constitute ribbon development along Redland Lane.	0/2
	1b: Openness	Openness has been compromised by development (of B2 or B8 Class logistics/industrial use buildings) along the A45 between London Road and Oxford Road, south of the Site. As a result of this, the Site is enclosed by development adjacent to the east, south and western boundaries.	2/2
			2/4
Purpose 2: to prevent neighbouring towns from merging into one another	2a: Location of parcel and distance between neighbouring settlements	The Site does not form or contribute to the gap between the industrial estate adjacent to Ryton on Dunsmore and Coventry, further to the West. The Site efficiently fills a gap between the existing settlement edge of Ryton on Dunsmore and the industrial estate adjacent to London Road (A45).	1/4
Purpose 3: To assist in the safeguarding of the countryside from encroachment	3a: Significance of existing urbanising influences	Development of B2/B8 Class Use development are located along the A45 between London Road and Oxford Road south of the Site where it extends from the western Site boundary to the junction where the A45 joins with the residential edge of Ryton-on-Dunsmore adjacent to the A423. The Site will be filling a gap between existing development of industrial/logistics use and so will not be uncharacteristic of development in the local area.	0/2
	3b: Significance of boundaries / features to contain	Existing development adjacent to the Site's eastern, southern (adjacent to the A45) and western boundaries mean further development cannot occur in those places. There is opportunity to maximise the existing landscape features to the north of the Site And implement a landscape buffer that will retain and enhance the vegetated boundary. There is also capacity to extend	0/2

Green Belt Purpose	Issue	Assessment	Score
	development and prevent encroachment	hedgerow and hedgerow tree planting within the north-western boundary of the Site to create a green corridor (see Figure 1: Opportunities and Constraints plan). A dense woodland landscape buffer will play a key in preventing encroachment north of the Site. Furthermore, directly north of the Site lies the Brandon Marsh Site of Special Scientific Interest which will also contribute towards preventing encroachment of development in the greenbelt parcel.	0/4
Purpose 4: To preserve the setting and special character of historic towns	4a: Parcel forms an historical and/or visual setting to the historic town	The Site does not overlap with a Conservation Area within an historic town. In addition, there is no intervisibility between the historic core of a historic town and the parcel."	0/4
Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land	5a: The need to incentivise development on derelict and other urban land within settlements	The Site is on greenfield land and does not fall under the category of derelict/other urban land, therefore, the assessment score is the same as the West Midlands Green Belt Assessment.	4/4
Total			7/20

1.2.5 Overall, the Site itself does has a very limited contribution towards the purposes of the greenbelt due to its scale and location alongside the surrounding existing development. Purpose 2 which had a score of 4 in the Joint Green Belt Assessment was given a rating of 0 as the Site itself does not contribute towards maintaining a gap between the settlements of Ryton-on-Dunsmore and Coventry. The existing industrial development to the west of the Site forms the edge of development associated with the Parcel with any development within the Site having no effect in reducing the gap between the two settlements, as such the score has been reduced to 0 against Purpose 4. The Site does not contribute in preventing unrestricted sprawl or preserving the setting and special character of historic towns. However, the Site is greenfield and therefore scores 4 with regards to purpose 5 of assisting in urban regeneration of derelict land,

1.2.6 As a result, the overall contribution of the Site to the purposes of the Green Belt is considered Low, scoring 7 out of 20 and is therefore considered to have a Low contribution to the functioning of the Green Belt.

### 1.3 Design Considerations

1.3.1 The design of the Development has been informed by desk-based analysis illustrated in **Appendix ... Opportunities and Constraints Plan**. Consideration of the above baseline conditions has informed the proposed layout within the Site, including the scale and massing of introduced built elements, and appropriate ground levels.

1.3.2 Further consideration has been given to different landscape treatments in order to deliver the objectives of the landscape strategy:

- Retention and enhancement of existing vegetation within and along the Site and its boundaries, where practicable;
- Conservation and enhancement of hedgerows and creating new sections where these are lost to development, gapped or in poor condition;
- Providing wooden edges (landscape buffer) along the northern boundary to retain and enhance the vegetated boundary, extend hedgerow and hedgerow tree planting within the north-western boundary of the Site to create a green corridor and increase the presence of this key landscape characteristic that form a robust green belt boundary;
- Improving biodiversity across the Site by introducing a variety of ecological habitats to include species-rich hedgerows; native tree planting; grassland meadows; ponds and wetland habitats; street trees; orchards; native garden planting; and garden trees, where practicable;

## 1.4 Summary

1.4.1 In summary, whilst the Joint Green Belt Assessment considered the whole of Parcel RD4 as a mid-performing parcel towards the functioning of the Green Belt, the Site itself does not hold the same weight. As the Site makes up for half of the parcel (approximately 25ha) and the assessment was made prior to the industrial development south of the Site, the assessment of the Parcel requires revising.

1.4.2 Given that the Site is judged to be among the lower performing parcels with respect to contribution to the Green Belt, it is therefore considered that it will have a greater potential for Green Belt release, providing exceptional circumstances can be shown to exist.

## Appendices



## References

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- <sup>i</sup> GOV.UK (2023) *National Planning Policy Framework*. Available at: <https://www.gov.uk/guidance/national-planning-policy-framework>. Accessed in January 2024.
- <sup>ii</sup> LUC (2015) *Joint Green Belt Study Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council*. Available at: [final-report-2015 \(coventry.gov.uk\)](https://www.coventry.gov.uk/media/1234567/final-report-2015). Accessed in January 2024.
- <sup>iii</sup> LUC (2015) *Joint Green Belt Study Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council Appendix 2*. Available at: [part-2-appendix \(coventry.gov.uk\)](https://www.coventry.gov.uk/media/1234567/part-2-appendix). Accessed in January 2024.