

Green Belt Contribution Study

Strategic Assessment

Rugby Borough Council

Final report

Prepared by LUC

October 2025



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Green Belt Contribution Study

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Chapter 1

Introduction

1.1 LUC has been commissioned by Rugby Borough Council (RBC) to undertake a strategic assessment of the contribution of Borough's Green Belt land to the Green Belt purposes, as defined in the National Planning Policy Framework (NPPF).

1.2 This assessment, which replaces the Green Belt study carried out by LUC for Rugby and neighbouring authorities in 2015 [\[see reference 1\]](#), is designed to provide a high-level strategic analysis to inform the early stages of the preparation of the Council's new Local Plan, specifically to inform early spatial options work for the Council's next draft Local Plan consultation.

1.3 The assessment methodology takes account of changes to the NPPF in December 2024 which introduced the concept of 'grey belt' and the requirement for local authorities to review their Green Belt boundaries, unless they are able to meet their identified development need in full. National Planning Practice Guidance (PPG) on the assessment of Green Belt land in order to identify grey belt was published in February 2025, so this assessment responds to that guidance in order to ensure that Rugby's evidence base with respect to grey belt is robust.

1.4 This report sets out the context, methodology and findings of the study.

1.5 This assessment does not identify land that is suitable for development or set out the exceptional circumstances for releasing land from the Green Belt. That will require the consideration of other evidence beyond the scope of this study.

Methodology consultation

1.6 A methodology was initially shared with neighbouring authorities in September 2024, prior to the NPPF changes and subsequent Green Belt PPG. Helpful consultation comments were received from Coventry City Council, including reference to a handful of additional Conservation Areas within the historic city, which were subsequently considered in relation to Green Belt Purpose 4.

1.7 As a result of the NPPF and PPG changes the assessment methodology has been significantly altered and so a further consultation was initiated.

Feedback was received from Stratford-on-Avon and Warwick District Councils, as a result of which a minor change was made to the methodology [See reference 2].

Report authors

1.8 This report has been prepared by LUC on behalf of RBC. LUC has completed Green Belt studies at a range of scales for over 50 English local planning authorities over the past ten years, including several planning authorities in the West Midlands.

Report structure

1.9 The remainder of this report is structured as follows:

- Chapter 2 sets out the study context, including a description of the Borough's Green Belt and the wider West Midlands Green Belt, a summary of national and local Green Belt policy and previous local Green Belt studies.
- Chapter 3 outlines the methodology used to undertake the high-level assessment of Green Belt contribution.
- Chapter 4 summarises the findings of the assessment of contribution to the Green Belt purposes, the areas identified as grey belt or as provisional grey belt, and the potential for fundamental impact on remaining Green Belt land.
- Chapter 5 presents the next steps for considering potential development sites, and presents high-level guidance on the interpretation and appropriateness of development on provisional grey belt land.

Chapter 2

Context

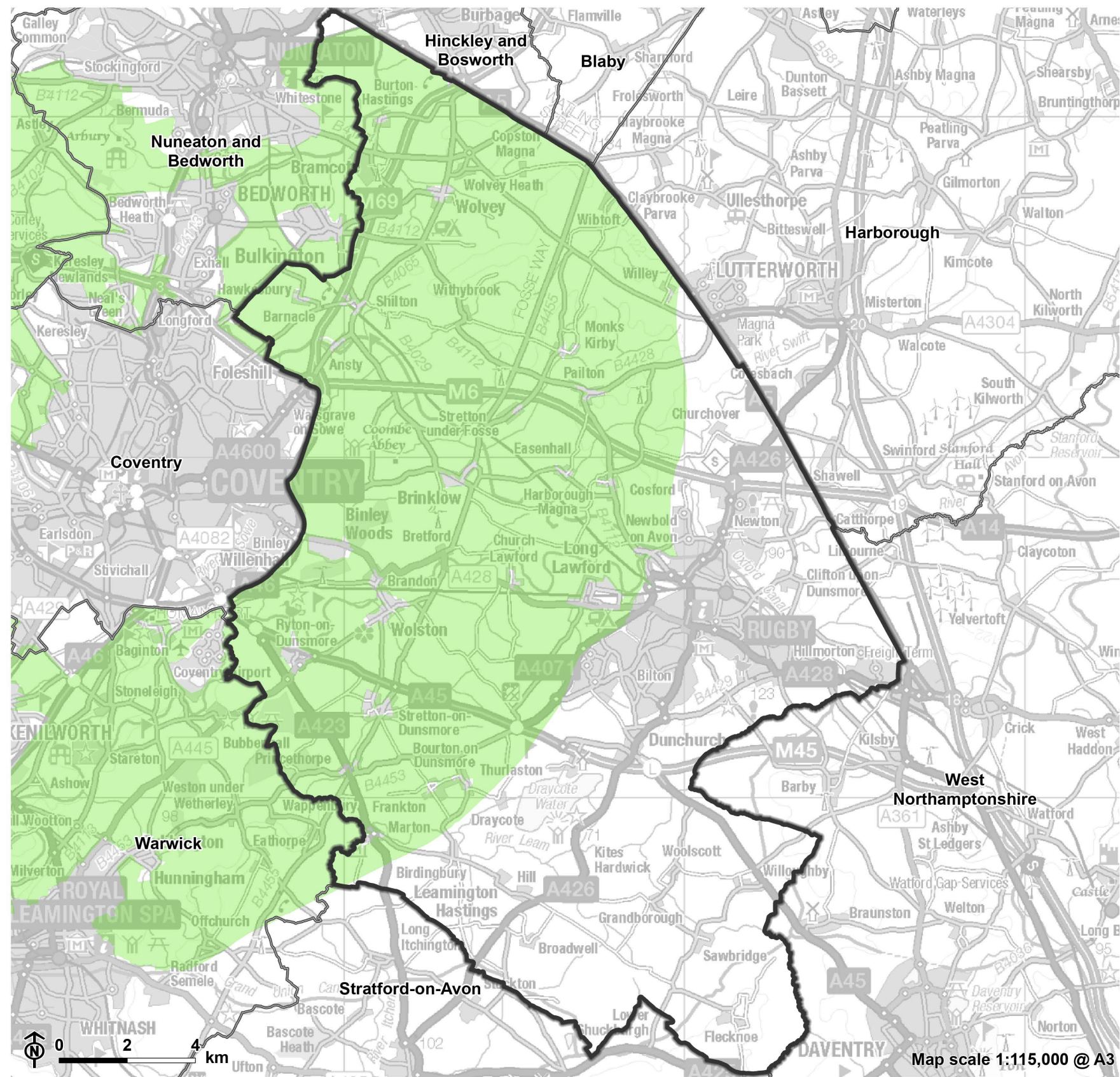
2.1 This chapter sets out the study context, including a description of the Borough's Green Belt and the wider West Midlands Green Belt, a summary of national and local Green Belt policy and previous local Green Belt studies.

Rugby Borough's Green Belt

2.2 Rugby Borough is located to the east of Coventry on the edge of the West Midlands Green Belt. The Borough covers approximately 35,360 hectares (ha) (see **Figure 2.1**).

2.3 A total of 20,570ha of Rugby Borough is designated as Green Belt, representing approximately 58% of the total area of the Borough. The vast majority of the Green Belt land in the borough is comprised of agricultural fields punctuated by country parks, villages and industrial estates

Figure 2.1: Rugby Borough's Green Belt



Rugby Green Belt Contribution Study
Rugby Borough Council



Figure 2.1: Rugby Borough's Green Belt

- Rugby Borough Boundary
- Neighbouring authority
- Green Belt

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Evolution of Green Belt Policy in the West Midlands

2.4 Settlements in the Midlands grew rapidly in the Industrial Revolution, continuing in the inter-war period, raising concerns around sustained ribbon development sprawling into the countryside. A regional study was carried out in 1948 with the aim of containing the main conurbation's growth and decentralising development across the wider region. The study recommended the definition of a Green Belt around the conurbation. Local authorities in the West Midlands formally proposed a West Midlands Metropolitan Green Belt in 1955, but it was not formally approved by the Secretary of State until 1975 [See reference 3].

2.5 In 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:

- To safeguard the surrounding countryside from further encroachment; and
- To assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

2.6 PPG2 was replaced through the publication of the NPPF in March 2012, revised and re-published in July 2018, February 2019, July 2021, December 2023 and this document currently provides national Green Belt policy. However, the new Government consulted on changes to the NPPF in August 2024 with an updated NPPF published in December 2024, and an accompanying PPG published February 2025.

Planning policy

National Green Belt policy

2.7 Government policy on the Green Belt is set out in Chapter 13 of the NPPF [See reference 4] 'Protecting Green Belt Land'.

2.8 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'.

2.9 This is elaborated in paragraph 143, which states that Green Belts serve five purposes, as set out below:

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Exceptional circumstances

2.10 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.’

2.11 Paragraph 146 goes on to state that ‘Exceptional circumstances in this context include, but are not limited to, instances 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.’

2.12 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. The examination of the authority’s strategy will address whether it:

- ‘makes as much use as possible of suitable brownfield sites and underutilised land;
- optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

- has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'

2.13 Paragraph 148 states 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

2.14 '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

2.15 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.

Very special circumstances

2.16 Paragraphs 153 and 154 state that ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.’

Appropriate Green Belt development

2.17 New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in a closed list in paragraph 154:

- ‘buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites);
- limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt; and,
- Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
 - i. mineral extraction;
 - ii. engineering operations;

- iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
- v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

2.18 In addition, paragraph 155 states the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- there is a demonstrable unmet need for the type of development proposed;
- the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

Golden Rules

2.19 Paragraph 155 states homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the ‘Golden Rules’ requirements set out below.

2.20 Where major development involving the provision of housing is proposed within or on land released from the Green Belt the following contributions should be made:

- affordable housing – in line with specifications set out in more detail in the NPPF and PPG.
- necessary improvements to local or national infrastructure; and
- the provision of new, or improvements to existing, green spaces that are accessible to the public.

National Green Belt Planning Practice Guidance

2.21 The NPPF's Green Belt policies are supplemented by Planning Practice Guidance [\[See reference 5\]](#) (PPG, February 2025) on Green Belt planning and how to assess Green Belt land, which is particularly relevant to the methodology of this study.

2.22 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.

2.23 The PPG makes it clear that strategic or local planning authorities, or appropriate groups of local planning authorities should produce a Green Belt assessment during the preparation or updating of all Local Plans, and Spatial Development Strategies that set the strategic context for the release of land where this would be required to meet development needs.

Assessing Green Belt land to identify grey belt land

2.24 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.

2.25 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.

The appropriate scale of Green Belt assessments

2.26 Authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

2.27 Green Belt land not judged to strongly contribute to any one of Green Belt purposes A, B and D has the potential to be identified as grey belt land. The assessment of variations in contribution to Green Belt purposes A, B and D must be informed by the criteria below.

2.28 Villages should not be defined as large built-up areas, towns or historic towns. Where there are no historic towns in or adjacent to a plan area, it may not be necessary to provide detailed assessments against Purpose D.

Green Belt assessment criteria

2.29 The PPG sets out illustrative criteria that should be considered when assessing the contribution of land to Green Belt Purposes A, B and D.

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

2.30 Green Belt land contributing **strongly** to Purpose A is likely to:

- be adjacent or near to a large built-up area;
- be free of existing development;
- lack physical features in reasonable proximity that could restrict and contain development; and,

- if developed, result in an incongruous pattern of development (such as an extended 'finger' of development into the Green Belt).

2.31 Green Belt land contributing **moderately** to Purpose A is likely to be adjacent or near to a large built-up area, and include one or more features that weaken contribution, such as (but not limited to):

- having physical feature(s) in reasonable proximity that could restrict and contain development; and/or
- contain or be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; and/or
- being subject to other urbanising influences.

2.32 Green Belt land contributing **weakly** to Purpose A is likely to be:

- not adjacent to or near to a large built-up area; or,
- adjacent to or near to a large built-up area, but containing or being largely enclosed by significant existing development.

Purpose B – to prevent neighbouring towns merging into one another

2.33 Green Belt land contributing **strongly** to Purpose B is likely to:

- be free of existing development;
- be a substantial part of a gap between towns; and
- if developed, would likely result in the loss of visual separation of towns.

2.34 Green Belt land contributing **moderately** to Purpose B is likely to be located in a gap between towns, and include one or more features that weaken contribution, such as (but not limited to):

- a small part of a gap between towns; or
- if developed, would not result in the loss of visual separation between towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

2.35 Green Belt land contributing **weakly** to Purpose B is likely to:

- not form part of a gap between towns; or,
- form only a very small part of a gap between towns, without making a contribution to visual separation.

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

2.36 Green Belt land contributing **strongly** to Purpose D is likely to:

- be free of existing development;
- form part of the setting of a historic town; and
- make a considerable contribution to the special character of a historic town, for example, as a result of being within, adjacent to, or of significant visual importance to the historic aspects of a town.

2.37 Green Belt land contributing **moderately** to Purpose D is likely to form part of the setting and/or contribute to the special character of a historic town, and include one or more features that weaken their contribution, such as (but not limited to):

- being separated to some extent from historic aspects of the town by existing development or topography;
- containing existing development; or
- not having an important visual, physical, or experiential relationship to historic aspects of a town.

2.38 Green Belt land contributing **weakly** to Purpose D is likely to not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town.

Applying NPPF footnote 7 to the definition of grey belt land

2.39 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

2.40 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 impact which would fundamentally undermine all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole.

2.41 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

2.42 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.

2.43 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.

Golden Rules for Green Belt development

2.44 Green Belt developments must contribute to accessible green spaces to meet the Golden Rules. The PPG defines ‘accessible green spaces’ as ‘areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions’ (PPG Paragraph: 012 Reference ID: 64-012-20250225).

2.45 The PPG requires, contributions to accessible green space to consider delivering:

- Good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.
- Include safe active travel routes and infrastructure (such as footpaths and bridleways).
- Nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Arrangements for the long-term maintenance of green spaces.

2.46 Further guidance on Golden Rules for Green Belt development is set out in viability guidance, which states site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing. The government intends to review this Viability Guidance and will be considering whether there are circumstances in which site-specific viability assessment may be taken into account, for example, on large sites and Previously Developed Land (PDL).

2.47 Prior to development plan policies for affordable housing being updated in accordance with paragraph 67 in the National Planning Policy Framework, the amount of affordable housing contributions required are subject to an overall cap of 50% or more.

Impact of development on the openness of the Green Belt

2.48 Where necessary, assessments of the impact of proposals on the openness of the Green Belt must be tailored to the circumstances of the case and may include consideration of a proposals:

- spatial volume, i.e. impact on spatial openness;
- visual impact, i.e. impact on visual openness;
- the duration of development, and its remendability; and,
- the degree of activity, such as traffic generation.

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

2.49 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 6]**. 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.

Local Green Belt policy

Rugby Local Plan (2011-2031)

2.50 The Rugby Local Plan (2011-2031) was adopted in June 2019 **[See reference 7]**. Policy GP2: Settlement Hierarchy states that in the Green Belt ‘new development will be resisted; only where national policy on Green Belt allows will development be permitted’.

2.51 Policy DS3: Residential Allocations allocates a number of sites for residential development, including eight locations in which land was released from the Green Belt. Policy DS6: Rural Allocations, applies to all detailed

proposals relating to those DS3 sites associated with rural settlements, which includes all the Green Belt releases. The policy requires development proposals to make specific provision for 'the appropriate treatment of Green Belt boundaries, limiting the impact of the development on the Green Belt'.

2.52 The Local Plan does not include any new employment allocations on Green Belt land, but there are a number of Strategically Significant Employment Sites (subject to policy ED1: Protection of Rugby's Employment Land) that are 'washed over' by the Green Belt designation (i.e. designated as Green Belt, despite their impact on openness).

2.53 The adopted plan outlined plans for further work to identify sites to meet local Gypsy and Traveller needs, including consideration of the expansion of existing sites, all of which are located in the Green Belt.

2.54 In December 2022, the Council made the decision to start work on a new updated Local Plan and a 'Issues and Options' Consultation took place in October 2023 [\[See reference 8\]](#). This document highlighted a number of potential locations for employment land development, including several locations in the Green Belt. Between March and May 2025 a Regulation 18 preferred options consultation for a new Rugby Borough Local Plan was undertaken. This consultation identified potential site allocations.

Most recent Rugby Green Belt study

2.55 The Council jointly commissioned a Green Belt Study with Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Stratford-on-Avon District Council and Warwick District Council in 2015, also prepared by LUC.

2.56 The 2015 study defined assessment parcels adjacent to the main built-up area and larger rural villages and rated them in accordance with a defined scoring system. Land beyond these parcels was assessed within larger blocks, termed 'broad areas', which were rated qualitatively rather than quantitatively.

2.57 All settlements were treated equally with regards to their relevance to each Green Belt purpose, i.e. 'large built-up areas', 'neighbouring towns' and 'historic towns' were not defined. Parcel ratings against individual purposes were combined to generate a total score for each defined parcel, and contributions to individual purposes were mapped separately.

2.58 The Borough's neighbouring Green Belt authorities, namely Coventry City Council, Nuneaton and Bedworth Borough Council, Stratford-on-Avon and Warwick District Council were part of the same Green Belt Study described above. They have yet to publish updated Green Belt assessments.

Chapter 3

Methodology

3.1 This chapter outlines the methodology used to identify high-level strategic variations in the contribution of the Borough's Green Belt land to the Green Belt purposes.

3.2 LUC's Green Belt assessment methodology has evolved since the production of the Borough's previous study in 2015, refined to benefit from a further nine years' experience of Green Belt assessments for over 50 local authorities across the country, and to accommodate changes in national planning policy, planning practice guidance and associated case law and Inspectors' decisions, including the most recent NPPF published late 2024, and PPG published in February 2025.

3.3 The relevant policy, guidance and case law that has informed the methodology is referenced where appropriate.

The location and scale of assessment areas

3.4 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, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances.

3.5 As a strategic-scale analysis, this study has not produced an assessment of defined parcels of land but has used an analysis process to identify variations in contribution to the purposes, with areas being defined to reflect those variations. The defined areas are the final product of the assessment, reflecting the range of variations in Green Belt contribution to the Green Belt purposes. This avoidance of predefinition of assessment parcels 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. It avoids misleading results where predefined areas have variations in contribution within a parcel that are averaged out.

3.6 Areas of variation differ in size depending on the range of factors (within and in their immediate vicinity) affecting their contribution, but with a minimum size, for this strategic-scale study, of ten hectares. This means that the ratings given to an area represent the strongest contribution within it and do not identify areas

of weaker contribution below ten hectares in size. In locations remote from urban edges there is typically less variation in contribution.

3.7 Potential strategic development sites can be overlaid on the findings of the Green Belt assessment to get an indication of the contribution they make to the Green Belt purposes, but it is anticipated that further, more detailed assessment of specific sites or areas of search will take place at a later date, should RBC identify a need for Green Belt release.

3.8 Lines denoting a change in rating to a Green Belt purpose 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.

3.9 Contribution to Purposes C and E are not relevant to the identification of grey belt but 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. Purpose C and E have also been assessed in this study.

3.10 All Green Belt land within the Borough has been assessed – no land was excluded from assessment based on its existing land use or the presence of other designations judged to represent absolute constraints to development.

Rating scale

3.11 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, this assessment of Green Belt land follows the rating scale referenced in the PPG.

3.12 Even where grey belt areas are defined through the study, a plan area’s growth needs and the need for development to be in sustainable locations may still require consideration of the release of Green Belt land that does not meet the grey belt definition, therefore Green Belt purposes C and E must also be rated.

3.13 The ‘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).

3.14 The release and/or development of strongly contributing Green Belt land is harder to justify, but NPPF paragraph 148 makes it clear that more sustainable greenfield sites (such as around train stations) on higher-performing Green Belt land can still be considered for allocation or permission where Exceptional or Very Special Circumstances apply.

3.15 The splitting of land which does not perform strongly into two levels – moderate and weak/no – is in line with the PPG on grey belt and helps, alongside sustainability considerations, to inform more nuanced judgements as to what land should be considered for release and development within lower contributing, including grey belt, locations.

NPPF footnote 7 areas and assets

3.16 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).

3.17 Footnote 7 states 'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitat sites **[See reference 9]** (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 10]** (and other heritage assets of archaeological interest referred to in footnote 75 **[See reference 11]**); and areas at risk of flooding or coastal change.' This is considered to cover the following, many of which may not be contained within or relevant to the assessment area:

- Sites of Community Importance;
- Special Areas of Conservation (SAC) – include possible SACs;
- Special Protection Areas (SPA) – including potential SPAs;
- RAMSAR sites – including proposed RAMSAR sites;
- Sites of Special Scientific Interest (SSSI);

- Sites identified, or required, as compensatory measures for adverse effects on habitats sites;
- Marine Conservation Zones;
- Irreplaceable habitats [See reference 12];
- World Heritage Sites;
- Scheduled Monuments;
- Registered Parks and Gardens;
- Registered Battlefield;
- Conservation Areas;
- Listed Buildings;
- Local Green Space;
- National Landscape;
- National Park (or Broads);
- Heritage Coast;
- Tier 1 Archaeological Priority Areas;
- Flood risk areas – including Flood Zones 2 and 3, surface water and ground water flood risk areas; and,
- Coastal Change Management Areas.

3.18 In light of the PPG, these areas and assets have not been excluded from assessment, but their location and extent has been mapped alongside the findings of the Green Belt contribution assessment, as shown on **Figure 3.1**. 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 are only ‘provisionally’ identified as grey belt land. Further detailed work needs to be undertaken by local planning authorities (as necessary through the plan-making and development management processes) to establish the effects of more detailed specific proposals on them.

3.19 GIS data on listed buildings (a designated heritage asset) and ancient and veteran trees (a designated irreplaceable habitats) is only available as point data. There is no consistent and accurate GIS data available marking the extent of the setting of such assets. Although these assets may be relevant at a localised scale, considering the strategic scale of this study they are not

mapped. However, when looking at specific sites these assets should be taken into consideration as appropriate through the plan-making and development management processes, to establish potential effects on these assets.

3.20 Mapped areas at risk of flooding are confined to Flood Zones 2 and 3 on the basis that additional areas of surface water or groundwater flooding outside of these flood zones are not mapped at a sufficiently granular and consistent scale across the study area to be useful to the definition of grey belt land at a strategic scale. The impact of prospective development sites on additional areas of surface water or groundwater flooding (outside of flood zones 2 and 3) will be considered in greater detail at a later stage through site allocation and/or development management processes.

Figure 3.1: NPPF Footnote 7 Designations

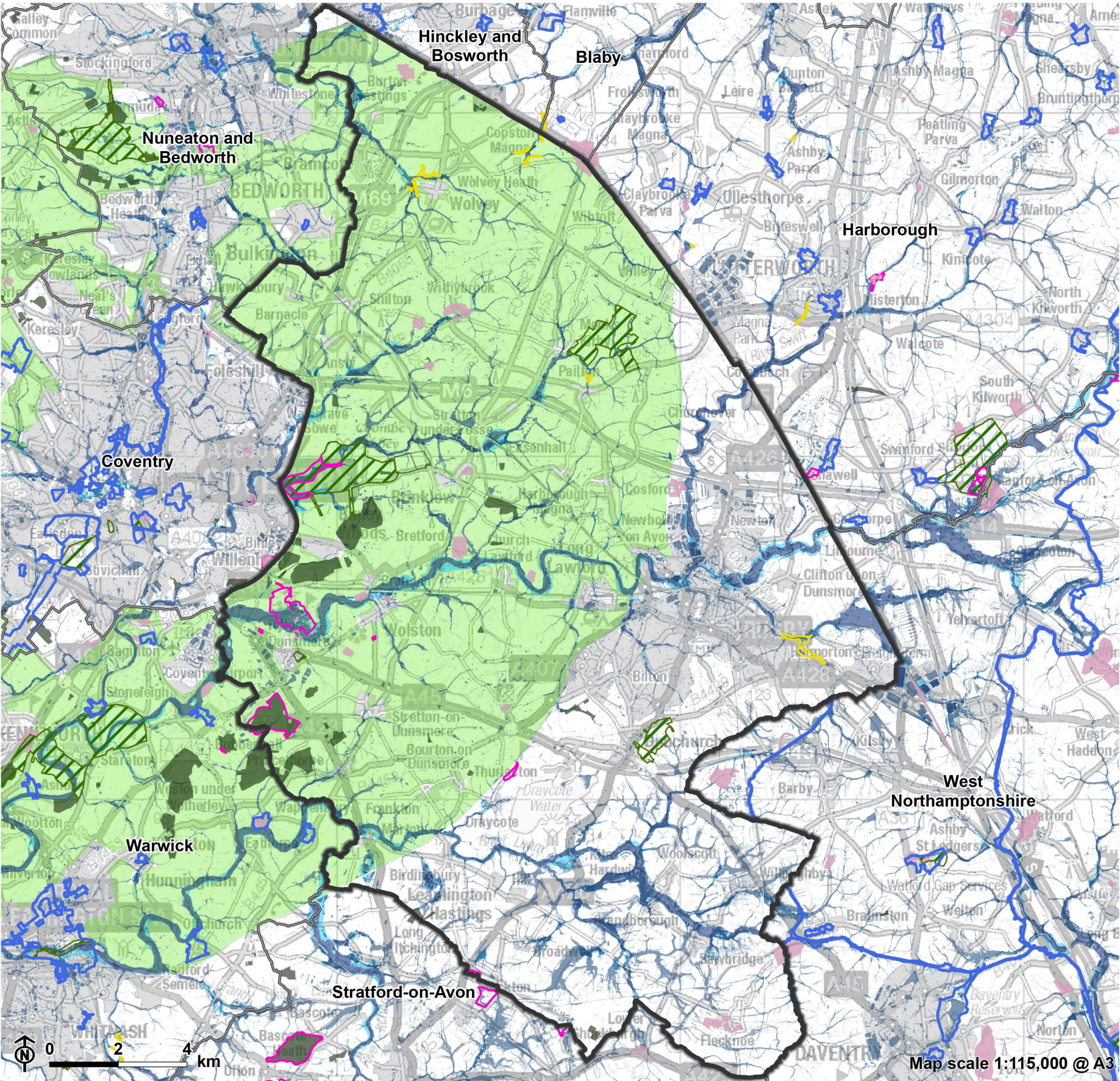


Figure 3.1: NPPF Footnote 7 Designations

- Rugby Borough Boundary
- Neighbouring authority
- Green Belt
- NPPF Footnote 7 designations**
 - Special Area of Conservation
 - Site of Special Scientific Interest
 - Ancient woodland
 - Lowland fens
 - Peaty soil
 - Conservation area
 - Scheduled monument
 - Registered Parks and Gardens
 - Flood zone 3
 - Flood zone 2
 - High risk of surface water flooding

NPPF Footnote 7 designations:
NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within the Rugby Borough or local data sets were not readily available. Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and should therefore be reviewed separately. The locations of these assets are illustrated in parcel proforma. Note that where present, saltmarsh is mapped, which could support spartina saltmarsh swards and mediterranean saltmarsh scrub irreplaceable habitats, but further site specific study may be required to identify these accurately.

Previously developed land

3.21 The NPPF defines grey belt ‘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.’ The definition makes it clear that only previously developed land (PDL) that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land, i.e. that PDL in isolation is insufficient justification to define Green Belt land as grey belt. This is supported by recent appeal decisions directly relevant to the matter [\[See reference 13\]](#).

3.22 The NPPF glossary defines Previously Developed Land (PDL) as ‘Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.’

3.23 Activities and land uses that qualify for definition as PDL and are greater than ten hectares in area, or are less than ten hectares but have a significant urbanising influence in an area, have been defined as making less than a strong contribution to Green Belt purposes A, B and D (by virtue of their urbanising influence and/or effect on the openness of the Green Belt). They therefore fall within defined grey belt locations through the strategic assessment process. Some PDL such as large areas of fixed surface infrastructure may in certain locations maintain a strong sense of openness such that they make a strong contribution to Green Belt purposes A, B or D and are not eligible for definition as grey belt land.

3.24 Grey belt at a scale less than ten hectares in area has not been identified through this strategic assessment. More detailed assessment for allocation through the plan-making process and/or development through the planning application process may therefore be required.

Assessment of Green Belt contribution and definition of grey belt land

3.25 Working outwards from inset settlement edges, the analysis process identifies variations in the relationship between urban and open Green Belt land, using lines to mark variations in the relevance of each Green Belt purpose and the strength of Green Belt land's relationship with urban areas and the open countryside. These lines have then been used to define areas (with a minimum size of 10ha) which each make a consistent level of contribution to the Green Belt purposes.

3.26 The paragraphs below identify the factors relevant to the assessment of each of the Green Belt purposes and detail the assessment outputs specific to each purpose in line with national planning policy, practice guidance and case law.

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

Grey belt PPG for Purpose A

3.27 The following features in combination are identified as being illustrative of a '**strong**' contribution:

- Absence of existing development.
- Proximity 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 the large built-up area.

3.28 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:

- 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.

3.29 Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development, is identified as being illustrative of a '**weak/no**' contribution to Purpose A.

Purpose A definitions

3.30 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'

3.31 The PPG states that 'villages should not be considered large built-up areas' (PPG Paragraph: 005 Reference ID: 64-005-20250225).

3.32 The West Midlands Metropolitan Green Belt was first established in Warwickshire in the Warwickshire Structure Plan 1975. The reasoned justification for the creation of the Green Belt in that document refers to its purpose as including (amongst other things) preventing coalescence of the "major urban areas" of the "Birmingham Conurbation" and the "Coventry Belt". The latter it defines as the corridor of towns from Nuneaton, through Coventry to Leamington and Warwick. It also states that the "prime purpose" of the Green Belt proposals was to "prevent the unrestricted outward spread of the Conurbation and of Coventry and of the towns and other settlements around and between them" and of "checking the unrestricted sprawl of built-up areas in Warwickshire".

3.33 The city of **Coventry** can clearly be considered a large built-up area.

3.34 The towns of Bedworth and Nuneaton, forming part of the "Coventry Belt", should also be regarded as part of a large built-up area, as they were in 1975.

Nuneaton is a large town and was defined by ONS in 2021 as a large built-up area in its own right.

3.35 In Rugby Borough, the Local Plan's settlement hierarchy identifies Rugby as a town, then defines nine 'main rural settlements'. All of the 'main rural settlements' are villages and are therefore not large built-up areas. Rugby itself is a large town with a population of more than 80,000. It was categorised by ONS in 2021 as a large built-up area. and is for the purpose of this study.

3.36 Of the urban areas around Rugby's Green Belt, that leaves Hinckley. Hinckley, as a town of circa 50,000 people (as defined by ONS in 2021) is considered large enough to treat as a large built-up area in its own right. In the 50 years since the first designation of the Green Belt in Warwickshire, both Hinckley and Nuneaton have expanded significantly towards the A5, such that Hinckley has also effectively become part of the Coventry Belt.

3.37 Lutterworth, in neighbouring Harborough District, is a small town (the 2021 ONS population figure is just over 10,500) which almost adjoins the very large commercial development at Magna Park. Magna Park is currently in the process of being expanded to over 500 hectares in area, which is significantly larger than Lutterworth itself. The development is bordered to the west by the A5, in part adjoining the Rugby Green Belt. Lutterworth and Magna Park are considered to constitute a large built-up area.

3.38 Land that is clearly contained by a large built-up area and lacking connection the wider countryside generally has a lower Purpose A function.

'Near to'

3.39 Purpose A is relevant to land which is 'adjacent or near to' a large built-up area. The extent to which land in the vicinity of a large built-up area relates to it is a question of judgement based on a range of factors including:

- Distance proportional to the size and proximity of large built-up areas.
- Features that create a sense of physical and/or visual separation.
- Features that weaken the sense of separation through physical and/or visual connection.
- Urbanising development and activity within the Green Belt.

3.40 Although villages are not large built-up areas, villages that lack significant separation from, or are relatively close to a large built-up area as a result of one

or more of the factors outlined above are considered to be near to a large built-up area. Bulkington, for example, is a village rather than a town, but is being less than 1km from Bedworth is near enough to be associated with the large built-up area.

3.41 The point beyond which Green Belt land is not considered to be ‘near to’ a large built-up area is where development, whether it be the expansion of existing villages or the creation of new settlements would be sufficiently distinct from the large built-up area as to not be perceived as sprawl associated with it.

‘Free of existing development’

3.42 ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 14\]](#) generally considers does not affect the openness of the Green Belt.

3.43 ‘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’

3.44 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.

3.45 For the purposes of a strategic assessment of existing Green Belt land, this judgement is based on existing physical features in reasonable proximity of existing urban areas, without consideration of potential strengthening of boundaries that could be associated with particular development proposals. Physical features that restrict and contain development would typically be:

- strong natural landscape elements such as woodlands or changes in topography, which limit views or create a stronger sense of separation between urban and open land; or
- natural or manmade features that present a physical barrier to movement, and which have some visual screening role, such as tree-lined rivers or canals, motorways and railway lines with embankments, or main roads with strong boundary vegetation.

3.46 Such features are not considered to restrict and contain development if they emanate out from a large built-up area.

3.47 The lines marking defined areas variations in contribution to the Green Belt purposes that result from the assessment process will often be physical features that restrict and contain development. The question of what constitutes 'reasonable proximity' - that is, the extent to which a physical feature that is some distance away would limit impact on undeveloped Green Belt land – is more likely to arise when harm of the release of a specific site is being addressed.

'Enclosed by existing development' ('partially' or 'largely')

3.48 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'

3.49 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.

3.50 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.

3.51 The urbanising influence of renewable energy and power infrastructure is judged on a case-by-case basis based on their permanence and scale of fixed surface infrastructure, such as large areas of hardstanding, associated with them. For example, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore are not judged as notable urbanising influences affecting contribution to the Green Belt purposes in perpetuity, whereas permanent substations set on fixed surface infrastructure, do affect the contribution to the Green Belt purposes over the long term.

3.52 The strength of urbanising influence associated with such areas depends on a number of factors, including the presence or lack of intervening physical boundary features, the scale/visibility of development in the associated urban area, landform change, distance from the existing urban edge and strength of relationship with the wider countryside.

'An incongruous pattern of development'

3.53 The PPG cites an extended "finger" of development into the Green Belt as an example of an incongruous pattern of development. Lines drawn to reflect variations in contribution to the Green Belt purposes are unlikely to be finger-like in form, so this scenario would more typically relate to the assessment of specific development proposals. There may, however, be smaller 'satellite' settlements around large built-up areas which lie close enough to them to be at risk of merger were development to reduce separation between them. Significant loss of separation in such a gap, could in effect lead to the satellite settlement becoming an extended finger of the large built-up area.

3.54 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

3.55 The following features in combination are identified as being illustrative of a ‘**strong**’ contribution:

- 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.

3.56 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:

- 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.

3.57 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.

Purpose B definitions

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

‘Town’

3.59 The PPG states that ‘this purpose relates to the merging of towns, not villages’ (PPG Paragraph: 005 Reference ID: 64-005-20250225). As all towns and cities adjoining the Green Belt in Rugby Borough have been defined as ‘large built-up areas’ for Purpose A, the same list of settlements is applicable to Purpose B

‘A substantial part of a gap’

3.60 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.

3.61 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 is 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.

3.62 An assessed area contributes more to the ‘substance’ of a gap between towns if it contains key separating physical features, and the more fragile a gap the smaller a part of a gap might be to be considered substantial.

3.63 The fragility of a gap is a key consideration to establish what is and is not substantial within or adjacent to a gap between neighbouring towns. 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 is typically relatively wide and contains significant physical features that maintain visual separation.
- A moderate gap may be relatively wide but lacks significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.

- A fragile gap is typically relatively narrow and lacks physical features that maintain visual separation.

3.64 Green Belt land can play a peripheral role and therefore make a more limited contribution to a gap between towns where it does not lie directly in a gap but its development would weaken Green Belt land in a gap. Green Belt land on the periphery of fragile gaps may still be judged to be a substantial part of it, but otherwise will generally not. Green Belt land within a gap may also to an extent be considered peripheral if the neighbouring towns in question are already to a significant extent connected by development.

3.65 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.

3.66 Relatively wide gaps between towns generally have potential to accommodate development in smaller parts of them without loss of visual separation between the towns. A defined area may represent 'a substantial part of a gap', where release of a sizeable portion of that area would have a significant impact on Purpose B, but such areas are generally rated as making a 'moderate' contribution to this purpose. This acknowledges their scope for limited development without significant loss of visual separation. In this way the assessment findings will help point to areas of search where there could be potential (in Green Belt terms) for development, including new settlements, in gaps between neighbouring towns.

A 'small' or 'very small' part of a gap'

3.67 '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.

3.68 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 generally also make a weak/no contribution to Purpose A.

‘Loss of visual separation’

3.69 ‘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’

3.70 ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 15\]](#) generally considers does not affect the openness of the Green Belt. Paragraph 160 of the NPPF states ‘elements of many renewable energy projects will comprise inappropriate development’; however, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore are not be judged as existing development affecting contribution to the Green Belt purposes in perpetuity.

3.71 ‘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

3.72 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. Ratings of contribution to Purpose C could still help inform judgements regarding which grey belt areas are more suitable for release than others in Green Belt terms. In addition, if the release and/or development of Green Belt land outside of defined grey belt areas needs to be considered, contribution ratings for Purpose C will likely be an important consideration. For example, in locations not near to and remote from towns and cities, variations in contribution to Purpose C will likely provide the only source of comparison in the contribution of Green Belt land to the Green Belt purposes.

Purpose C definitions

3.73 Purpose C has been 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 within it would significantly increase urbanising influence on adjacent open land.

‘Part of the countryside’

3.74 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.

‘Urbanising influence’

3.75 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.

3.76 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 C contribution ratings

3.77 Contribution to Purpose C has been determined in terms of whether land makes a strong, moderate and weak /no contribution to this Purpose.

3.78 The following features in combination are identified as being illustrative of a ‘**strong**’ contribution:

- 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.

3.79 The following features in combination are identified as being illustrative of a '**moderate**' contribution:

- 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.

3.80 The following features in combination are identified as being illustrative of a '**weak/no**' contribution:

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

Grey belt PPG for Purpose D

3.81 The following features in combination are identified as being illustrative of a '**strong**' contribution to Purpose D:

- 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.

3.82 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:

- Containing existing development.
- Separated from historic aspects of the town by existing development or topography.
- No important visual, physical, or experiential relationship to historic aspects of a town.

3.83 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

3.84 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'

3.85 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 16]**. Durham has since been added to this list.

3.86 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.

3.87 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.

‘Setting and special character’

3.88 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.

3.89 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.

3.90 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’

3.91 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. This has been done with reference to historic environment evidence for each historic town, such as historic town setting studies and conservation area appraisals.

3.92 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.

3.93 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’

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

Purpose D outputs

3.95 Green Belt Purpose D is ‘to preserve the setting and special character of historic towns’. Specific reference is made to ‘historic towns’, not to individual historic assets or smaller settlements such as villages and hamlets.

3.96 From our review of relevant literature it is clear that there was no specific reference to ‘historic towns’ when justifying the original designation of the West Midlands Metropolitan Green Belt (as noted above, it was devised principally as a means of preventing the outward expansion of the built up area of the West Midlands conurbations into open countryside and of preventing towns and cities from coalescing and losing their separate identities). However, it has been LUC’s experience through consultation with Historic England on several Green Belt studies, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive, so this assessment takes the approach of identifying settlements classed as towns and considering whether any have a special character or setting to which land within the Green Belt contributes.

3.97 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 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.

3.98 Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose 2 above, a desk-based review of evidence covering the historic setting and special character of **Bedworth, Coventry, Hinckley, Nuneaton** and **Rugby** has been undertaken. In the absence of any overarching studies documenting the setting and special character of historic

towns in the region, the review has focussed on the contents of available conservation area appraisals and associated plans.

3.99 The historic towns of Bedworth and Nuneaton have historic cores designated as a conservation areas. Neither Bedworth nor Nuneaton Town Centre Conservation Area Appraisals mention of the wider countryside designated as Green Belt as contributing to the towns' setting and special character, likely a result of the modern expansion of the towns. Furthermore, the open countryside designated as Green Belt within Rugby Borough is located some distance to the south east of the historic towns, limiting its wider influence **[See reference 17]**.

3.100 The historic city of Coventry contains 18 conservation areas within and around its historic core **[See reference 18]**:

- Allesley Conservation Area
- Brownhill Green Conservation Area
- Chapel Fields Conservation Area
- Coventry Canal Conservation Area
- Earlsdon Conservation Area
- Far Gosford Conservation Area
- Greyfriars Green Conservation Area
- Hawksbury Junction Conservation Area
- High Street Conservation Area
- Hill Top Conservation Area
- Ivy Farm Lane Conservation Area
- Kenilworth Road Conservation Area
- Lady Herbet's Garden and the Burges Conservation Area
- London Road Conservation Area
- Nauls Mill Conservation Area
- Spon End Conservation Area
- Spon Street Conservation Area
- Stoke Green Conservation Area

3.101 The appraisals and accompanying plans of each have been reviewed to establish whether the Green Belt land in Rugby Borough surrounding the city contributes to its historic setting and special character. Despite some intervisibility from the surrounding Green Belt in Rugby towards historic landmarks in the city, no connection of notable significance has been found. This is considered to be driven largely by the fact that the historic core of the city, including all of the conservation areas, do not lie in close proximity to the Green Belt within Rugby Borough, separated physically by the modern expansion of the city around Binley, Pinley, Potter's Green, Manor House, Stoke, Walsgrove on Sowe, Whitley, Willenhall, Woodway Park and Wyken. These areas are also retained by the Coventry Eastern bypass that surrounds the city, including the A46 and M6, which represent strong separating features between the large built-up area and the open countryside designated as Green Belt within Rugby Borough.

3.102 The historic town of Hinckley has five conservation areas in the urban area [\[See reference 19\]](#):

- Ashby Canal Conservation Area
- Burbage Conservation Area
- Hinckley Druid Street Conservation Area
- Hinckley Hollycroft Conservation Area
- Hickley Town Centre Conservation Area

3.103 The appraisals and accompanying plans of each have been reviewed to establish whether the Green Belt land to the south west of the town plays a notable role in the recognised historic cores of the town. No clear connection has been found, with all but the Ashby Canal being close to the southwestern edge of the town, following the modern expansion up to Watling Steet (A5), which represents a strong separating feature between the modern town and the wider Green Belt beyond. The Ashby Canal cuts through the Green Belt to the south west of the town. The Conservation Area Appraisal notes that the canal 'meanders through attractive open countryside passing few large centres of population. Even in Hinckley, the largest town it traverses, the impression is generally that of a semi-rural navigation with green fields and hedgerows on either side'. However, this portion of the canal has no relationship with the wider historic core of the historic market town to the east and is therefore not considered to be relevant to this study area in Green Belt terms.

3.104 The historic town of Rugby contains five conservation areas in the urban area [\[See reference 20\]](#):

- Bilton Conservation Area
- Bilton Road Conservation Area
- Clifton Road, Hillmorton Road and Whitehall Road Conservation Area
- Rugby School Conservation Area
- Rugby Town Centre Conservation Area

3.105 Again, despite some intervisibility between the surrounding Green Belt in Rugby and historic landmarks in the town, no connection of notable significance has been found between the Green Belt land in Rugby Borough and the historic setting and special character of historic Rugby. This is considered to be driven largely by the fact that the historic areas of the town do not lie in close proximity to the Green Belt within Rugby Borough, separated physically by the modern expansion of the town around Cawston, Cosford and New Bilton, with Cawston and New Bilton being retained by the A4071 that surrounds the town, which represents a strong separating feature between the urban area and the open countryside designated as Green Belt.

3.106 Considering the above evidence, none of Rugby's Green Belt is considered to make a contribution to preserving the setting and special character of historic towns. It is important to note that this does not mean that Rugby's settlements and neighbours do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose 4. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

Purpose E – to assist in urban regeneration

3.107 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.

3.108 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’ [\[See reference 21\]](#).

3.109 More generally regarding plan-making, paragraph 147 of the NPPF states that ‘before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development [including] a) makes as much use as possible of suitable brownfield sites and underutilised land and b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport’. In other words, Purpose E must have already been followed before options in the Green Belt are considered further.

3.110 Using evidence to inform meaningful judgements on the collective contribution Green Belt land makes to Purpose E is also difficult. In the absence of any clear guidance on what percentage of recorded brownfield land enables a Green Belt to play a stronger or more limited role in encouraging urban regeneration, a uniform level of ‘moderate’ contribution to Purpose E is applied to all areas of Green Belt in the study area.

Fundamental impact on remaining Green Belt land

3.111 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’.

3.112 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.

3.113 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’

3.114 The plan area is the area covered by the local plan – i.e. Rugby Borough.

‘Purposes (taken together)’

3.115 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. 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’

3.116 Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in the 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.

3.117 The scale and contiguity of Green Belt land within a district 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 district 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.

3.118 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.

3.119 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.

3.120 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.

3.121 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. This is not applicable in Rugby.

3.122 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.

Assessment Outputs

Maps and analysis of variations in contribution

3.123 The conclusions chapter contains a series of maps (one for each purpose) to illustrate the identified variations in contribution to each purpose. Each map is accompanied by justification text to explain the prevailing factors influencing the patterns and variations in Green Belt contribution to each purpose.

Conclusions on grey belt

3.124 Two additional ‘overview’ maps are provided, illustrating:

- Areas suitable for definition as ‘grey belt’, that is Green Belt land judged not to perform strongly to Green Belt purposes A, B and D and outside the defined footnote 7 areas and assets. Footnote 7 areas and assets that overlap with areas otherwise suitable for definition as grey belt land are provisionally defined as grey belt subject to further detailed assessment. It should also be noted that land which is not identified as footnote 7, but has some relationship with or is within the ‘setting’ of these areas and assets, should be considered in more detail to establish potential effects on the footnote 7 features.
- Highest contribution rating of each identified variation in Green Belt contribution across the Borough, to help the Council digest and use the study findings in the early plan-making process. This map offers a high-level indication of the overall contribution of the Borough’s Green Belt to the national Green Belt purposes (noting that no Green Belt purpose is considered more important than another and strong contribution to a single purpose is sufficient to justify its continued designation in Green Belt terms).

Conclusions on fundamental impact

3.125 Without a clear understanding of the location of release or development, its scale and land use, including what Green Belt land would remain within a plan area, it is not possible to make a definitive judgement on whether release of land would fundamentally undermine the purposes of Green Belt. In the absence of specific proposals, the variations in contribution to each Green Belt purpose identified in this assessment highlights the areas where Green Belt contribution is at its greatest within Rugby. These areas of highest contribution in a borough are reviewed in the round to judge where release or development could fundamentally and meaningfully undermine the purposes in the borough. These judgements are justified.

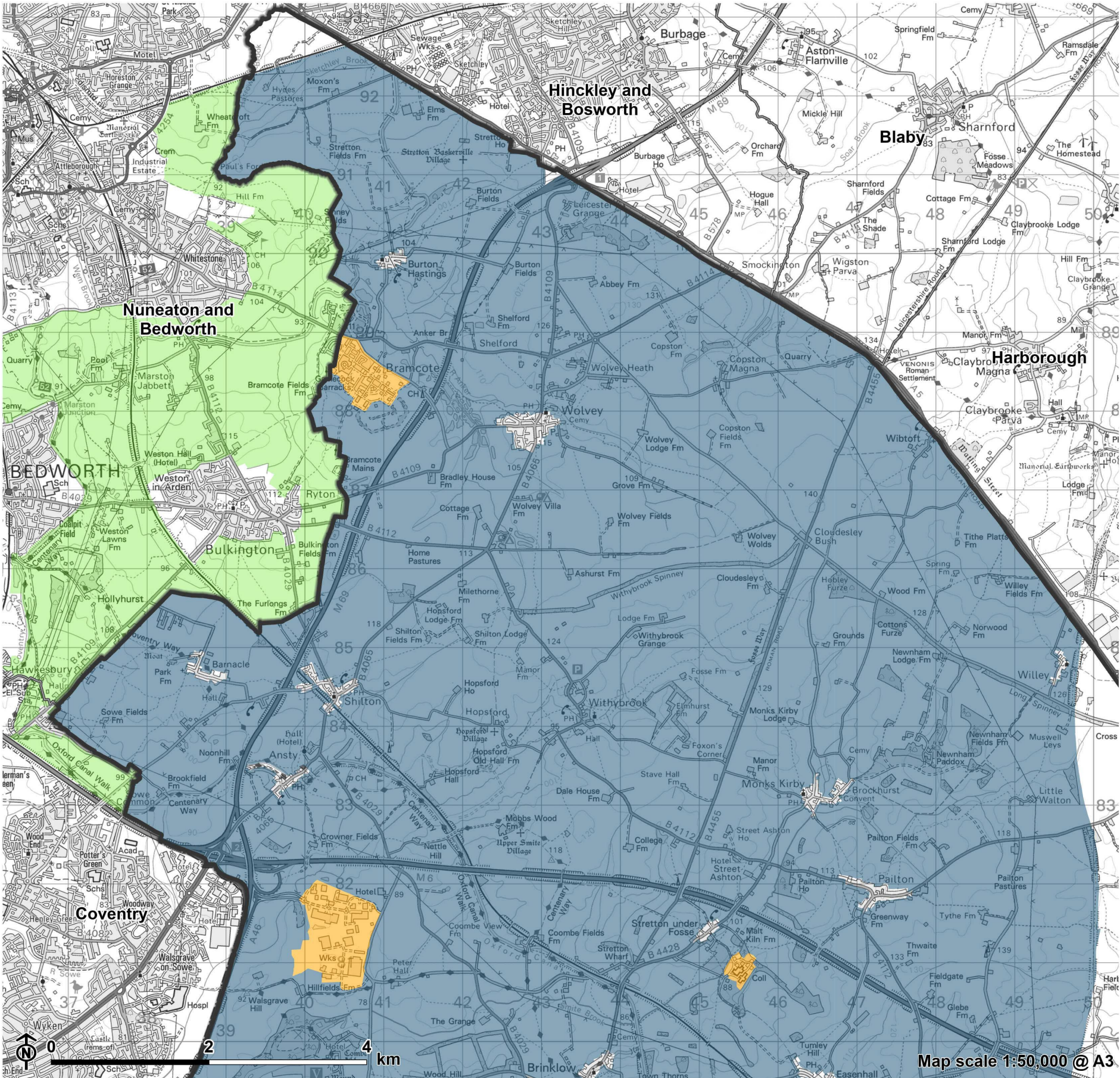
3.126 When the Council is in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.

Chapter 4

Strategic Green Belt Contribution Assessment Findings

4.1 This chapter summarises the findings of this strategic Green Belt contribution assessment. **Figures 4.2** through **4.6** map all notable strategic variations in contribution to the national Green Belt purposes, with **Figure 4.1** combining these to show the highest contribution rating across the Green Belt purposes. **Figure 4.7** maps all the areas suitable for definition as 'grey belt', i.e. Green Belt land judged not to perform strongly with regard to Green Belt Purposes A, B or D.

Figure 4.1: Highest rating for contribution to NPPF Purposes A, B, C, and D

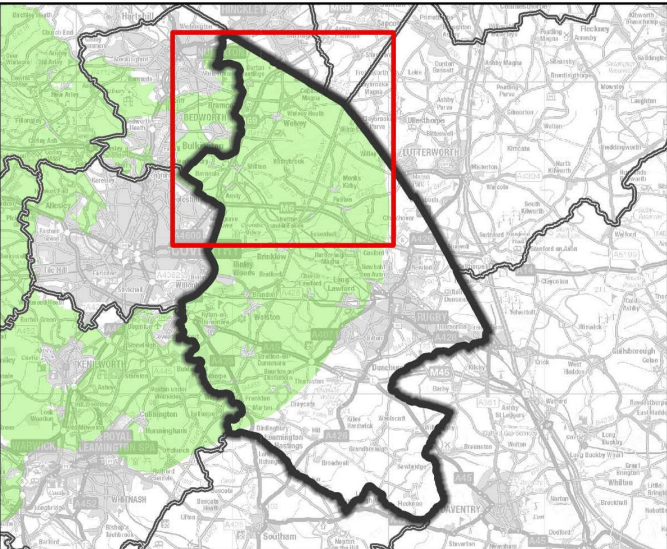


Rugby Green Belt Contribution Study
Rugby Borough Council



Figure 4.1: Highest rating for contribution to NPPF Purposes A, B, C and D

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Highest Rating:**
 - Strong
 - Moderate
 - Weak/No

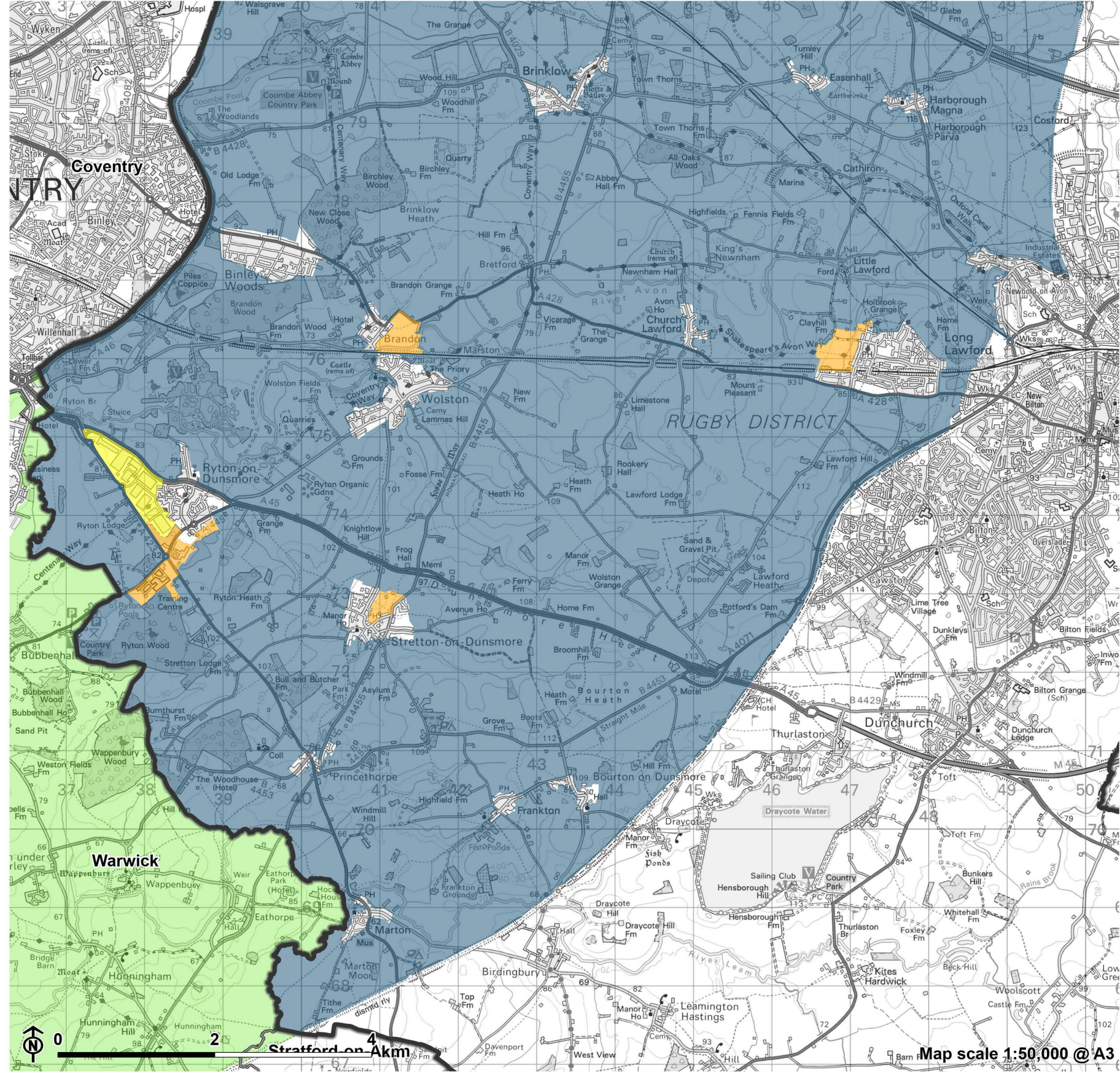
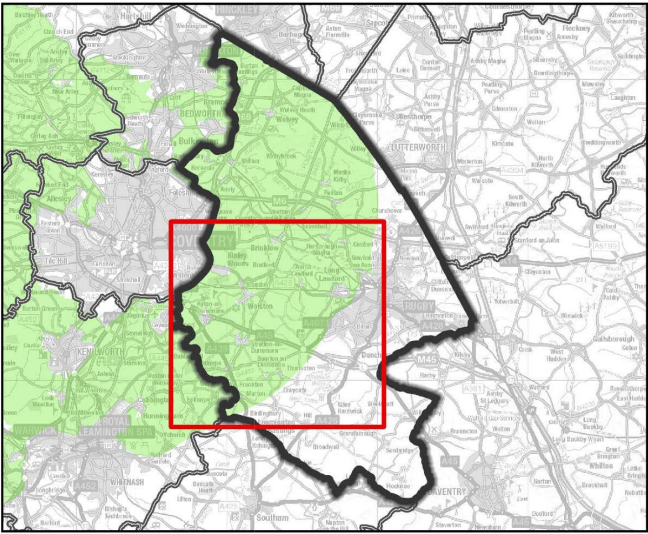


13488_001_RugbyMainReportMaps/
13488_r5_Results_A_Figure_4 22/10/2025

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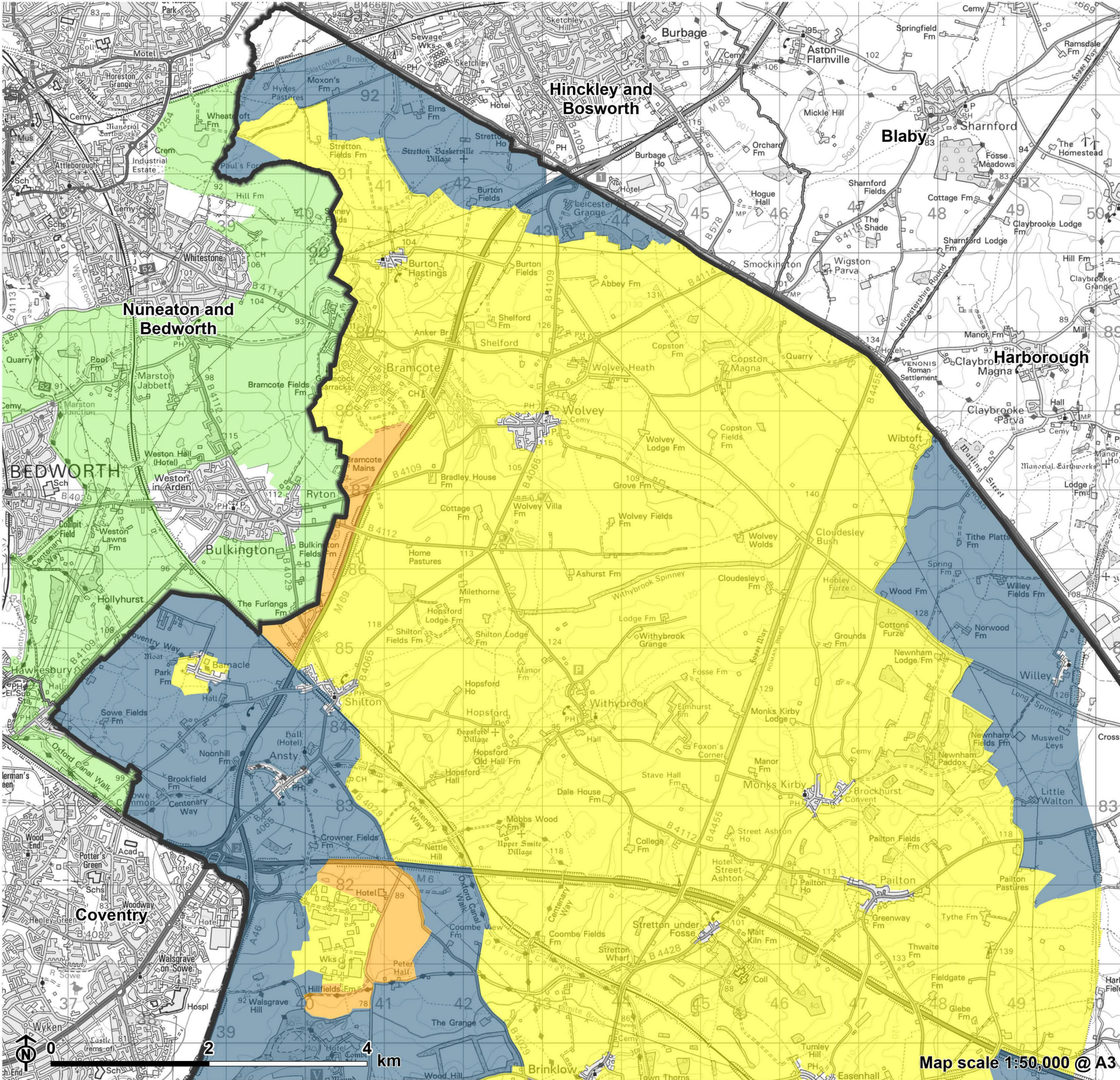
Figure 4.1: Highest rating for contribution to
NPPF Purposes A, B, C and D

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Highest Rating:**
 - Strong
 - Moderate
 - Weak/No



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Figure 4.2: Contribution to Purpose A – check the unrestricted sprawl of large built-up areas

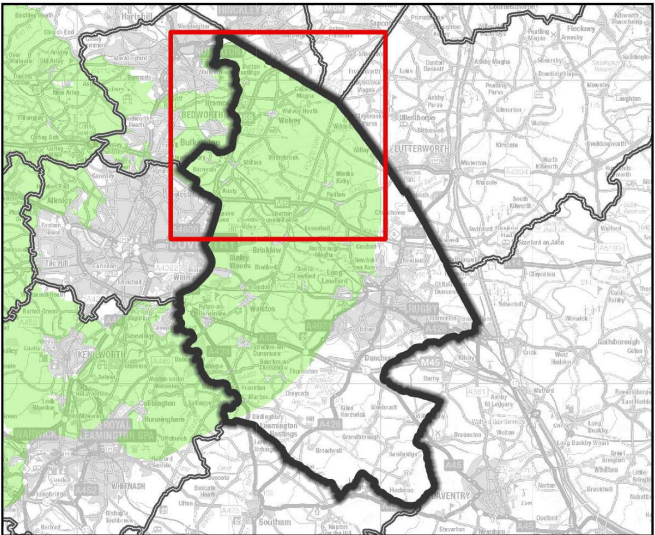


Rugby Green Belt Contribution Study
Rugby Borough Council



Figure 4.2: Contribution to Purpose A –
Check the unrestricted sprawl of large built-
up areas

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No



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**Figure 4.2: Contribution to Purpose A –
Check the unrestricted sprawl of large built-up areas**

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No

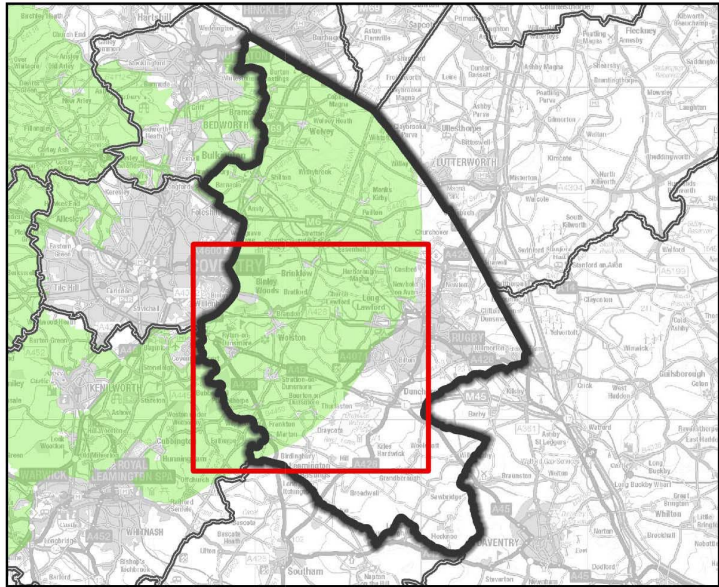
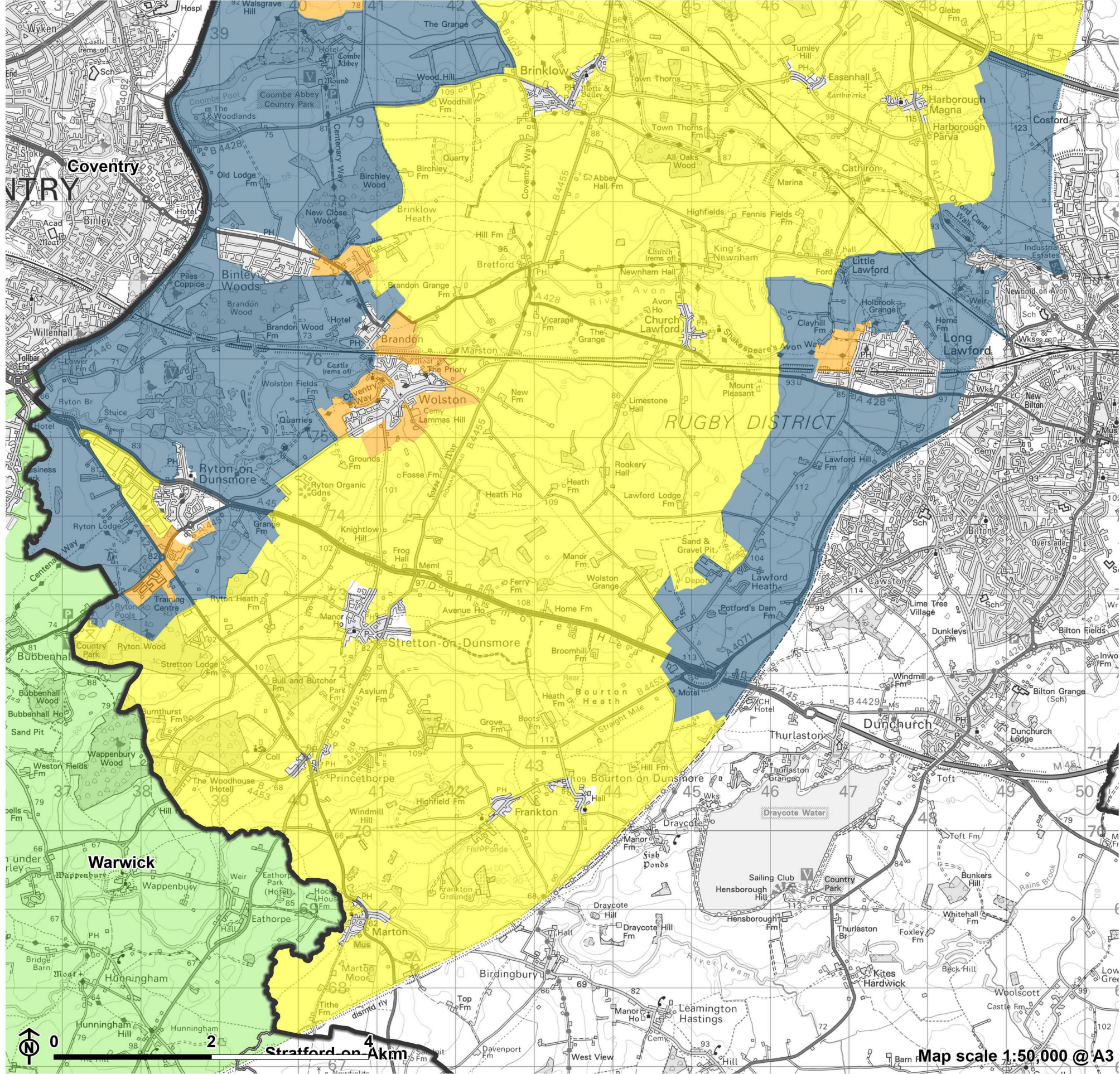


Figure 4.3: Contribution to Purpose B – Prevent neighbouring towns merging into one another

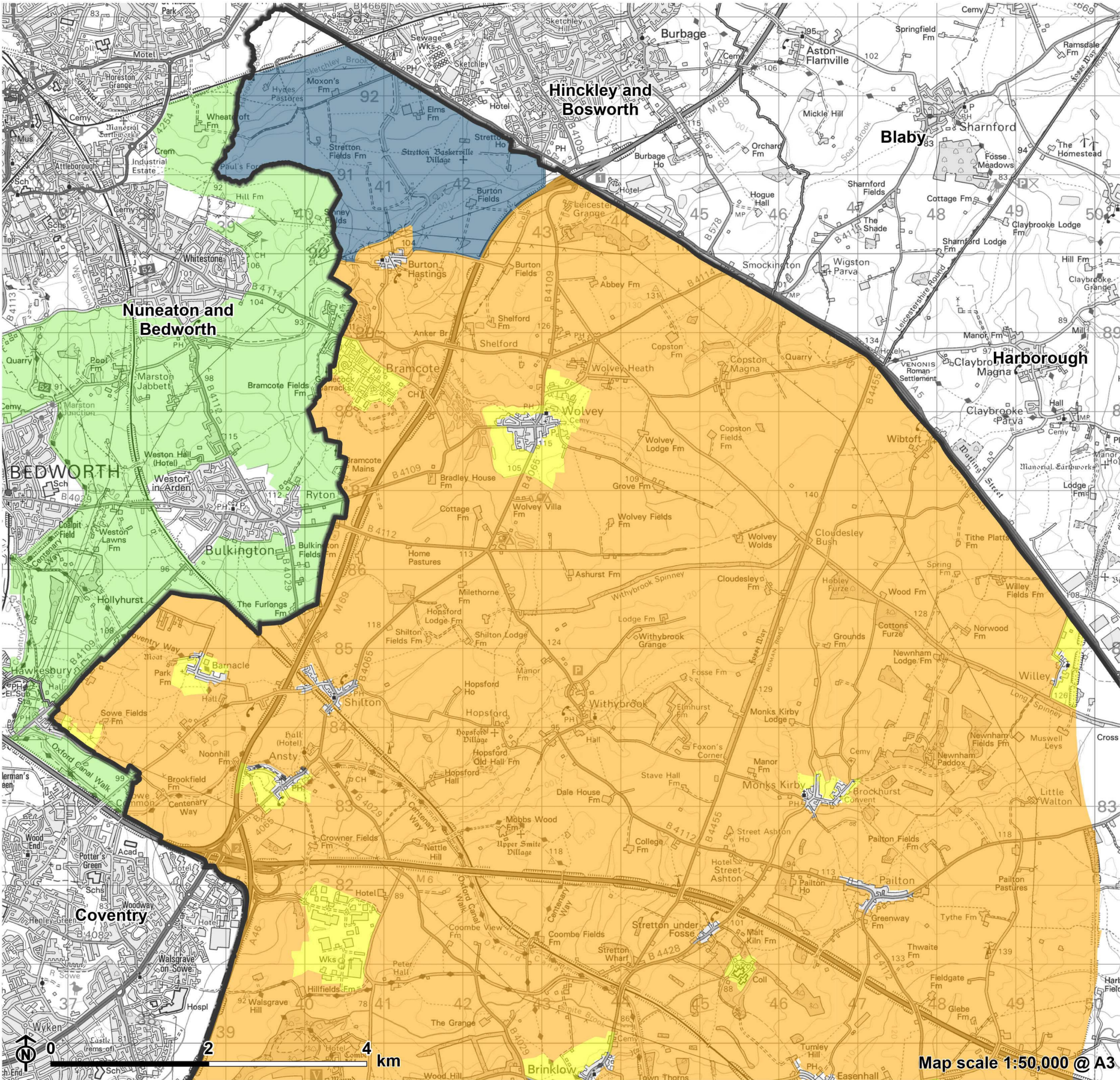


Figure 4.3: Contribution to Purpose B – Prevent neighbouring towns merging into one another

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No

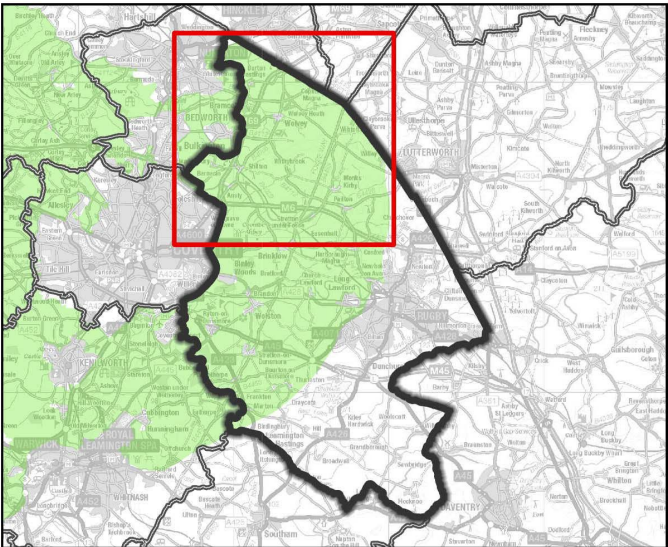


Figure 4.3: Contribution to Purpose B –
Prevent neighbouring towns merging into one
another

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No

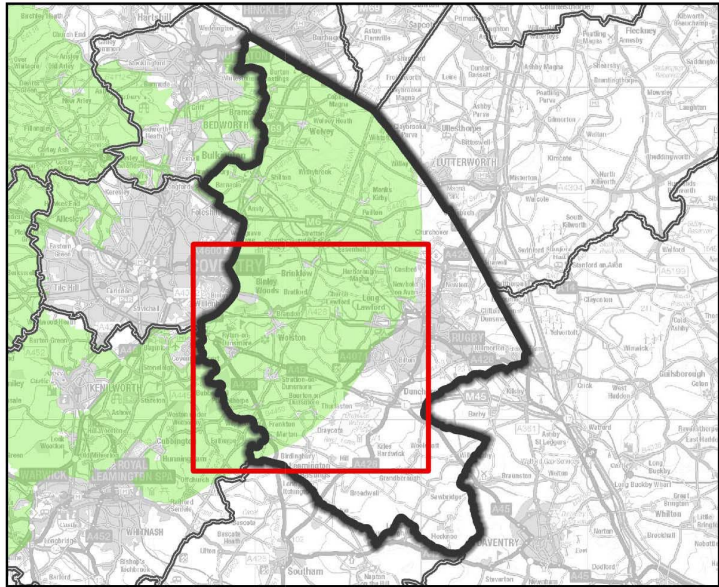
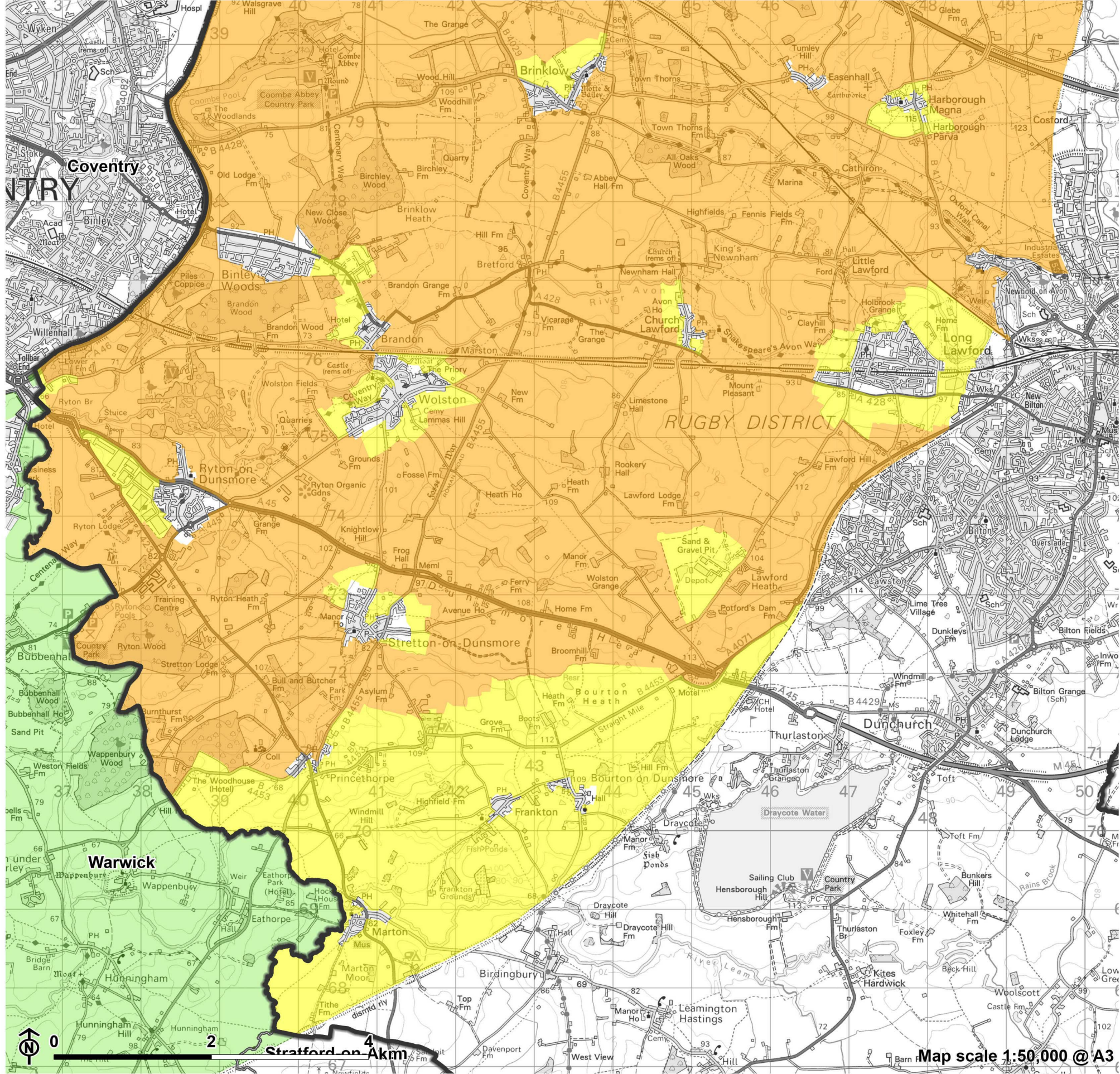
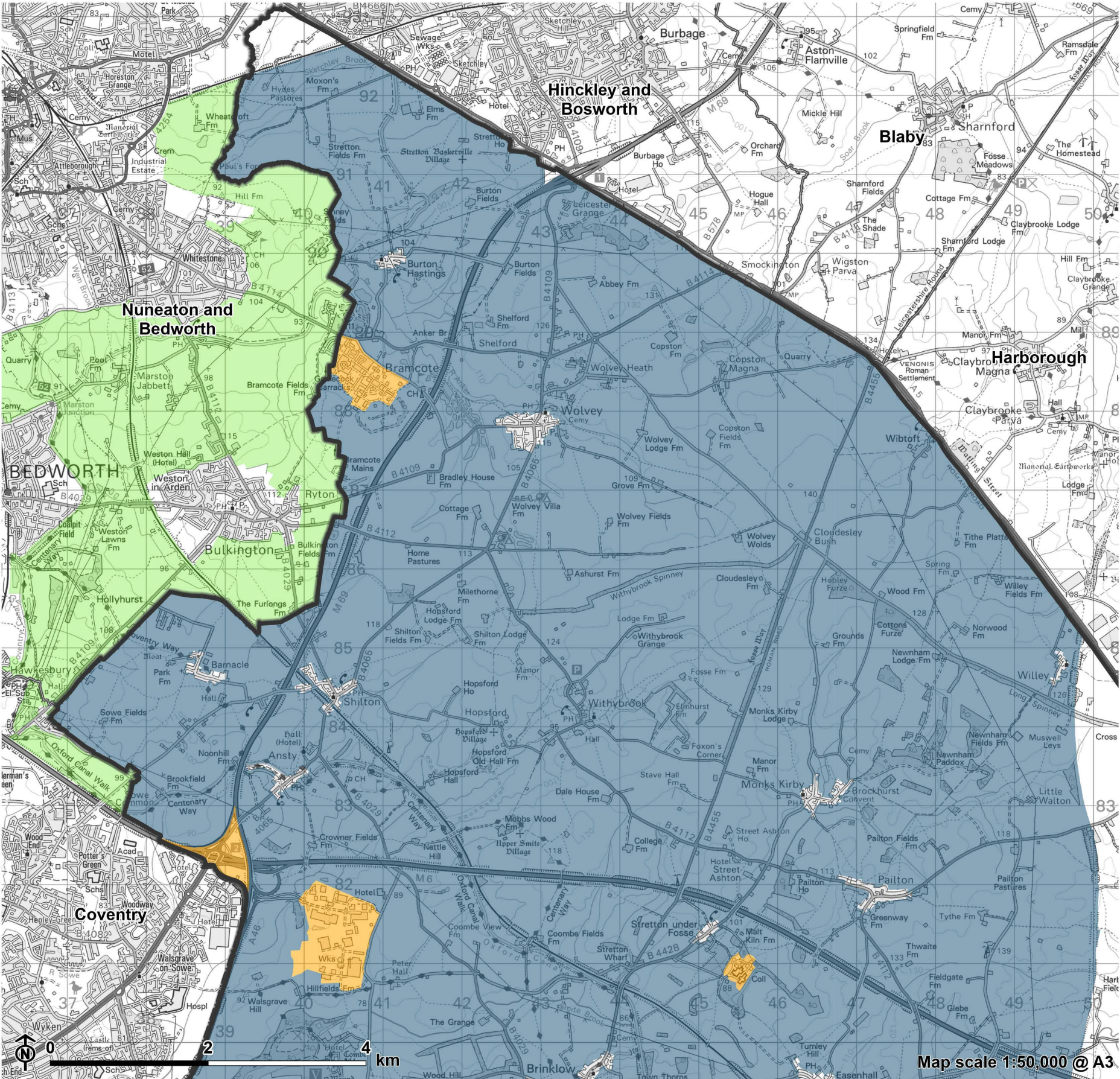


Figure 4.4: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment

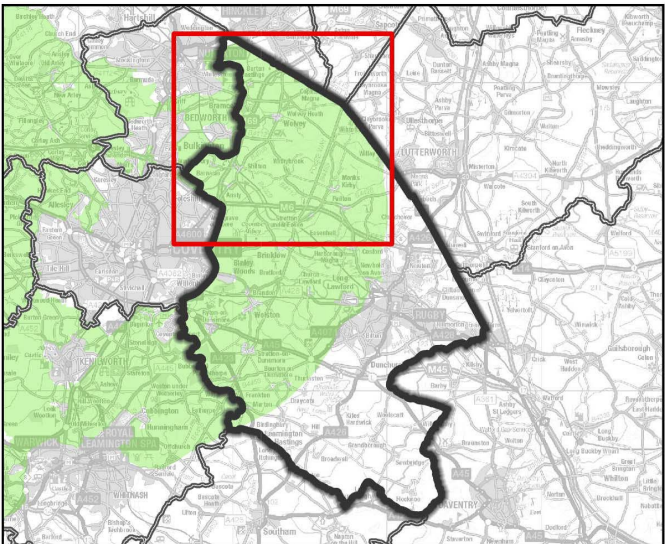


Rugby Green Belt Contribution Study
Rugby Borough Council



Figure 4.4: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No



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13488_r5_Results_A_Figure_4 22/10/2025

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Figure 4.4: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No

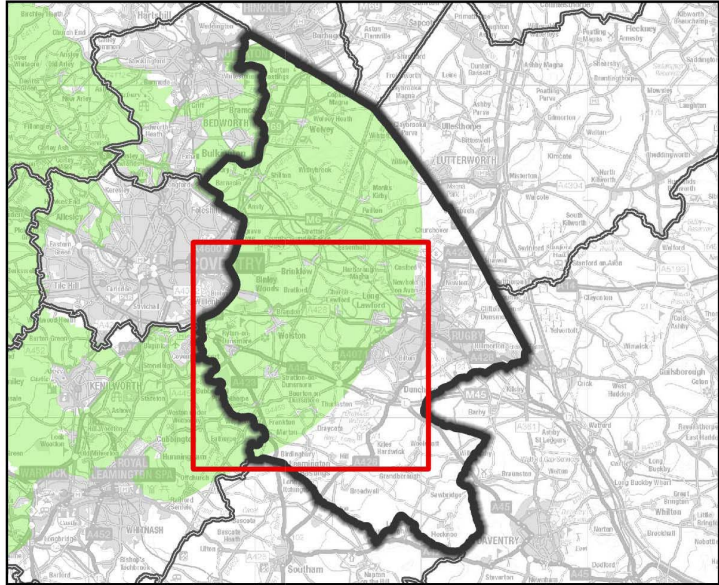
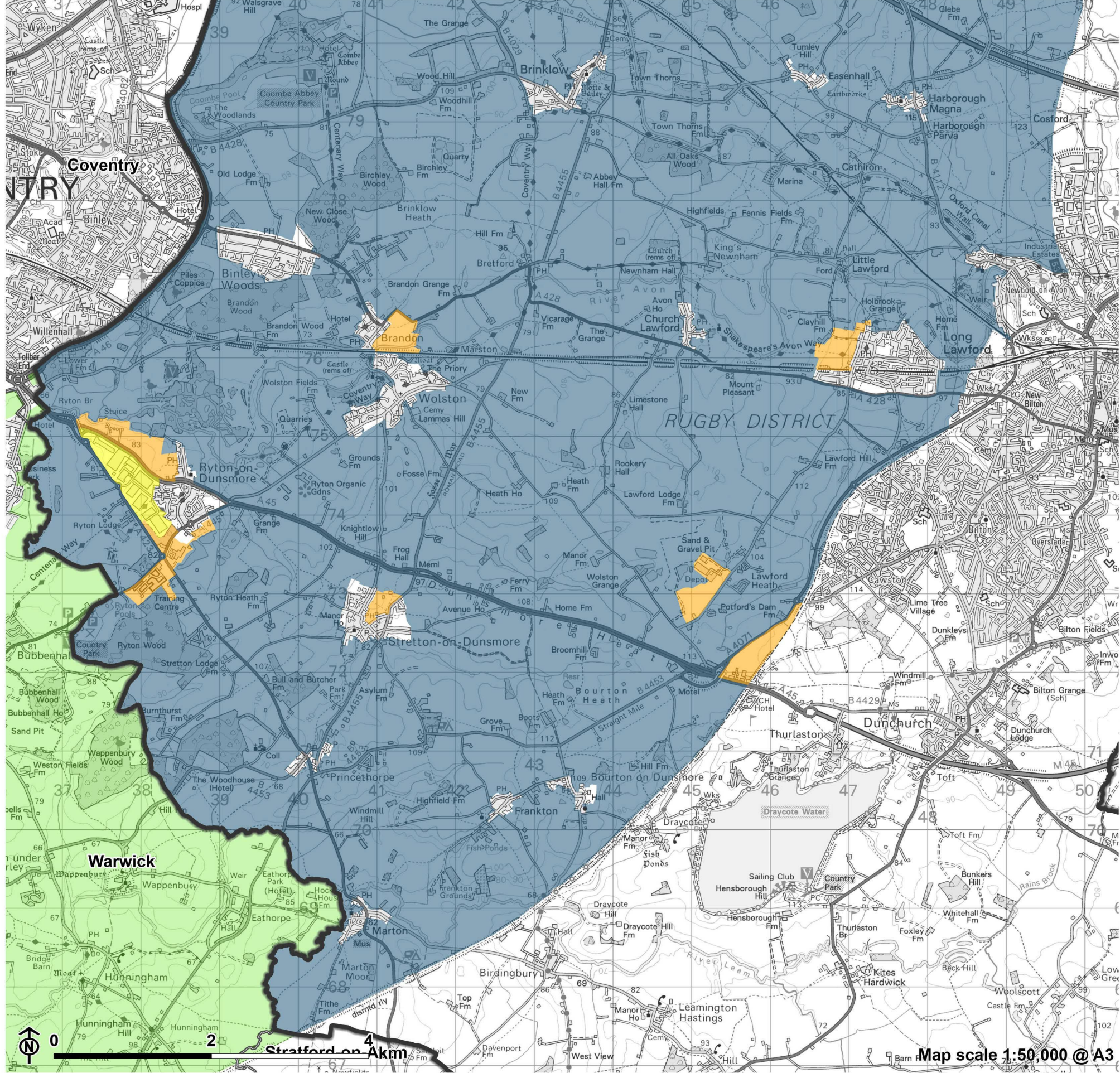


Figure 4.5: Contribution to Purpose D – Preserve the setting and special character of historic towns

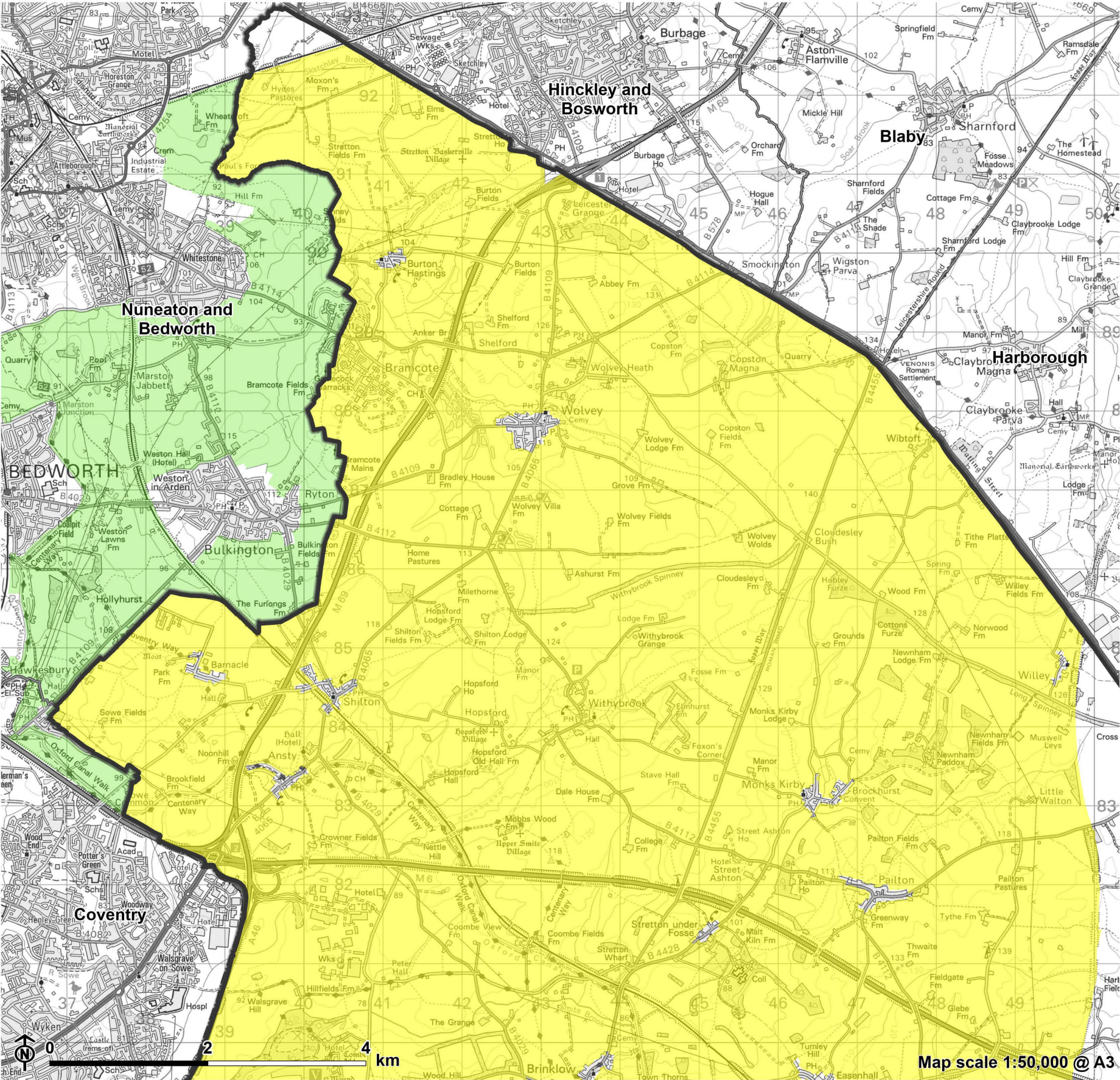
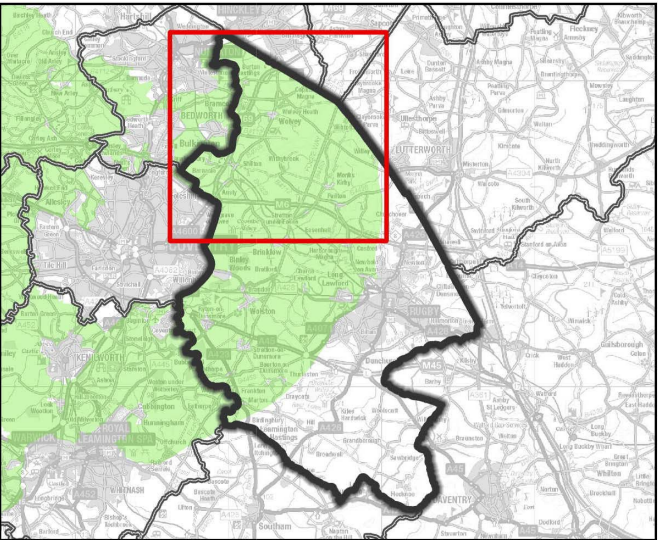


Figure 4.5: Contribution to Purpose D – Preserve the setting and special character of historic towns

-  Rugby Borough boundary
-  Neighbouring authority
-  Green Belt
- Purpose Contribution Rating:**
 -  Strong
 -  Moderate
 -  Weak/No



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Figure 4.5: Contribution to Purpose D – Preserve the setting and special character of historic towns

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Strong
 - Moderate
 - Weak/No

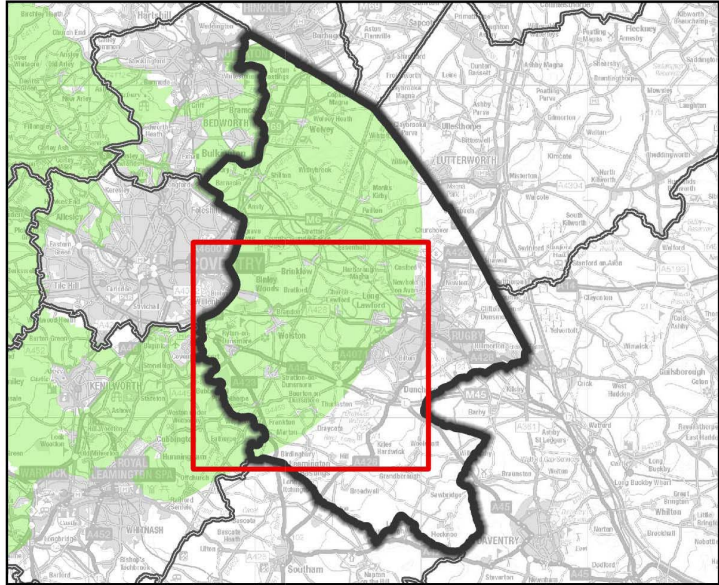
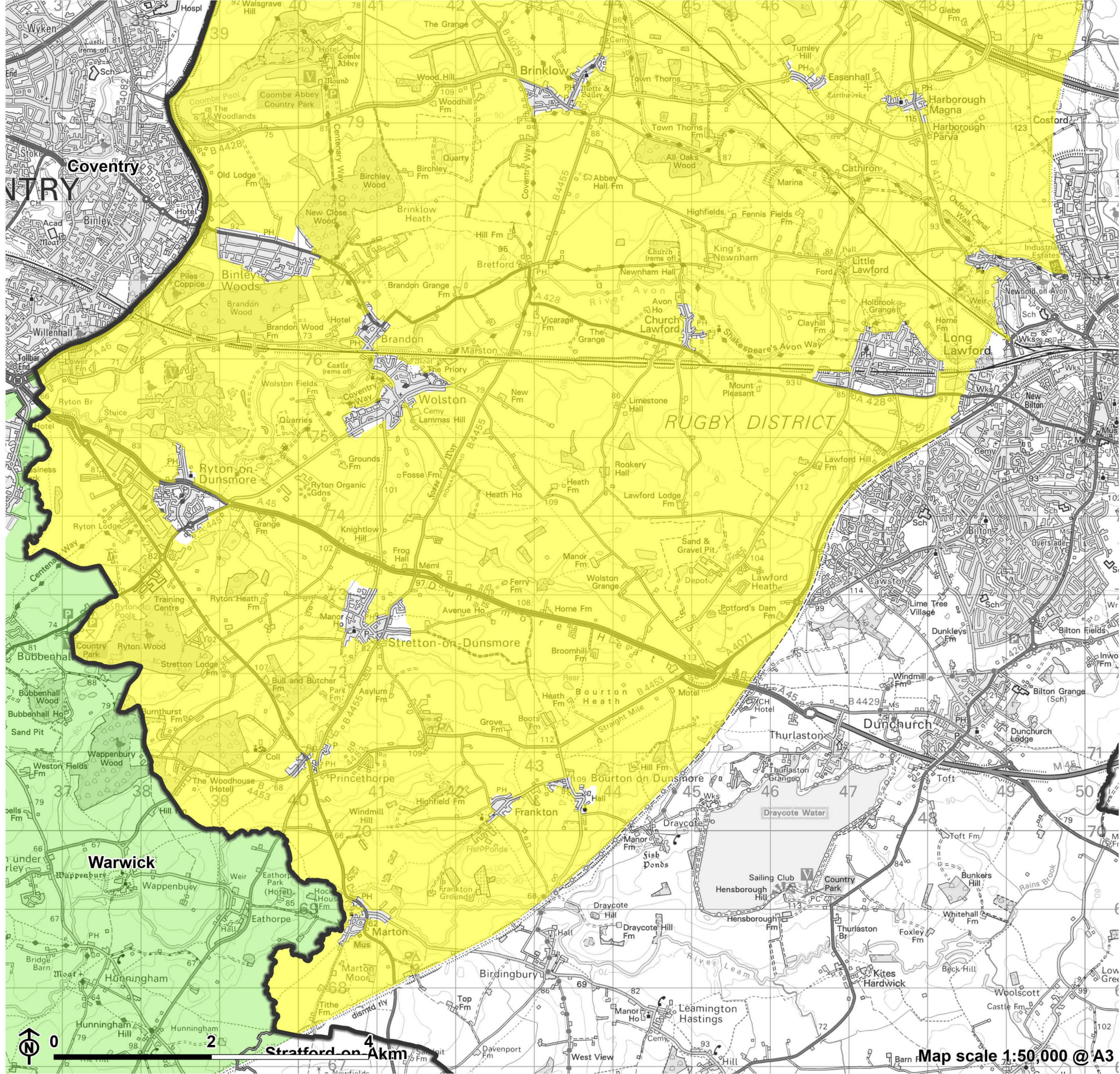
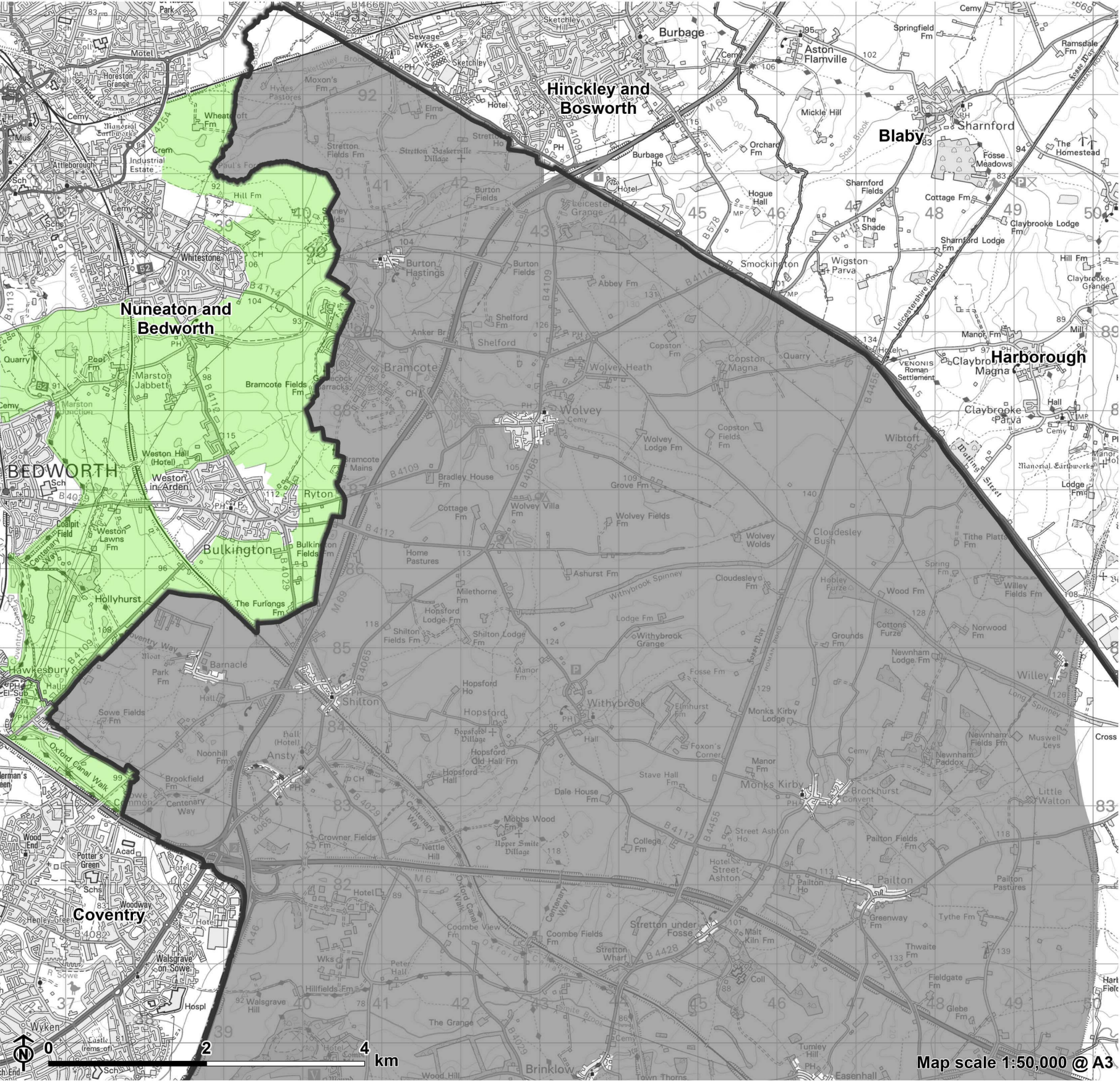


Figure 4.6: Contribution to Purpose E – To assist in urban regeneration

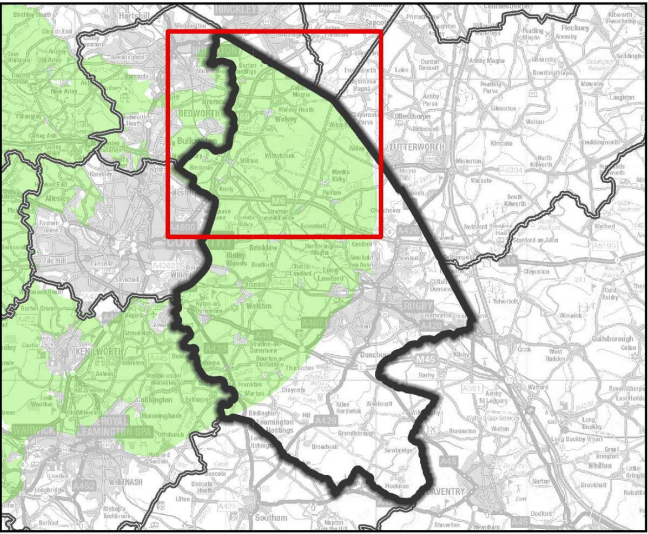


Rugby Green Belt Contribution Study
Rugby Borough Council



Figure 4.6: Contribution to Purpose E – To assist in urban regeneration (e.g. encouraging the recycling of derelict and other urban land)

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:
 - Equal



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Figure 4.6: Contribution to Purpose E – To assist in urban regeneration (e.g. encouraging the recycling of derelict and other urban land)

- Rugby Borough boundary
- Neighbouring authority
- Green Belt
- Purpose Contribution Rating:**
 - Equal

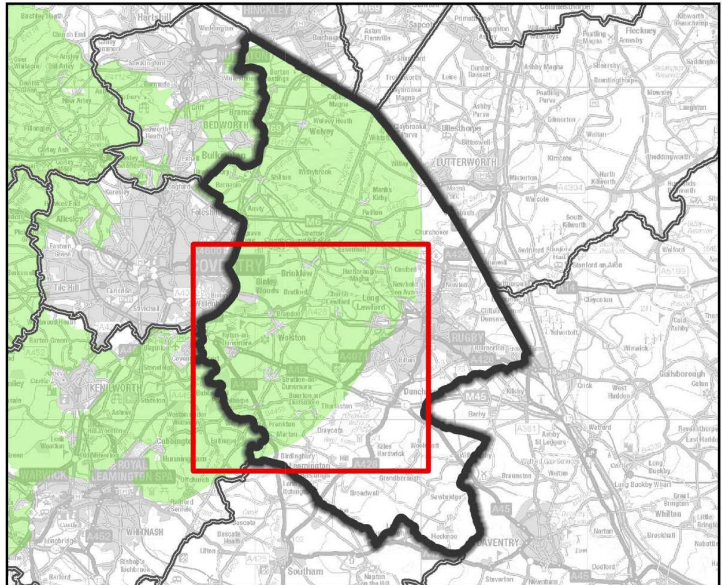
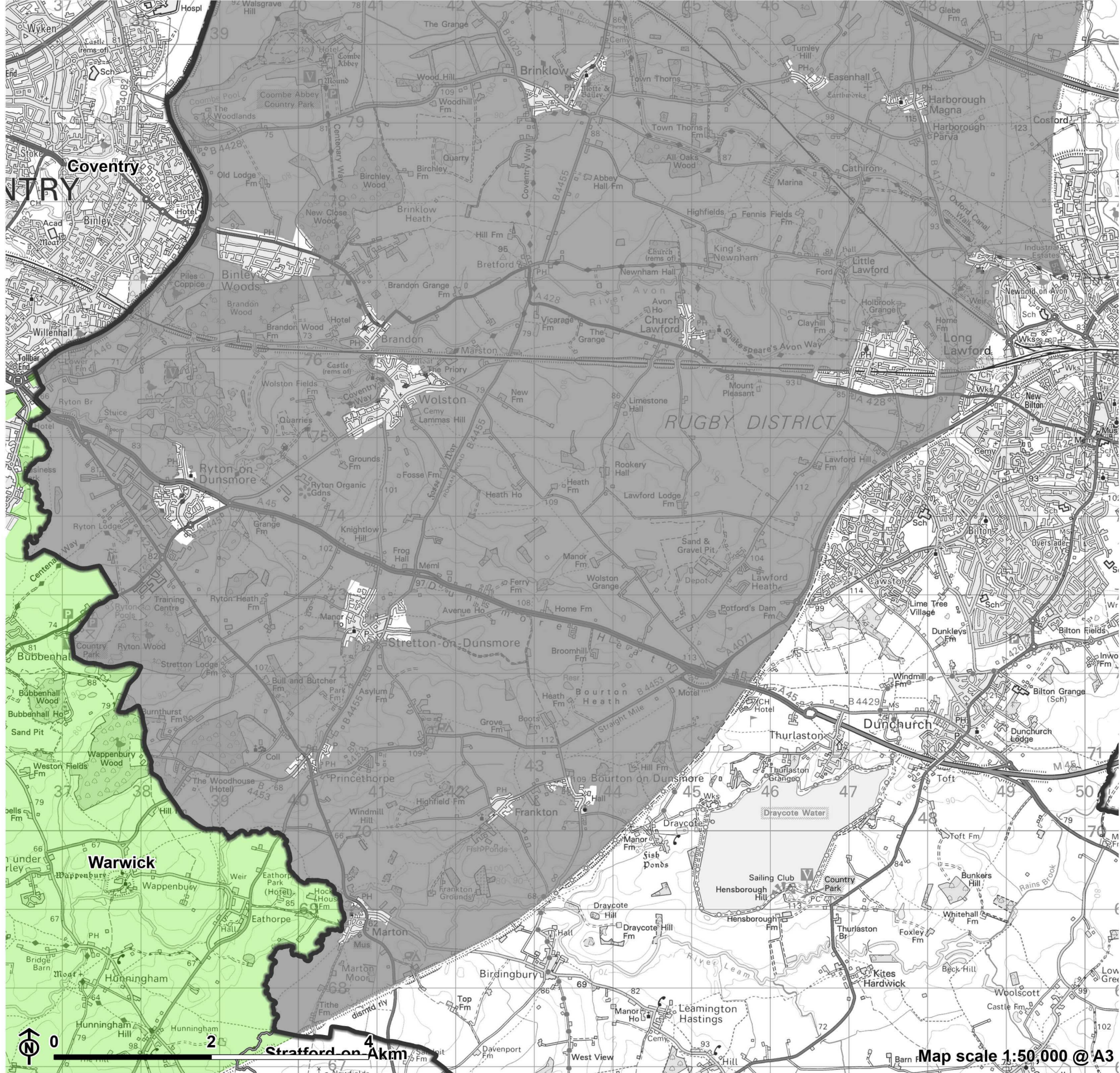


Figure 4.7: Areas suitable for definition as grey belt

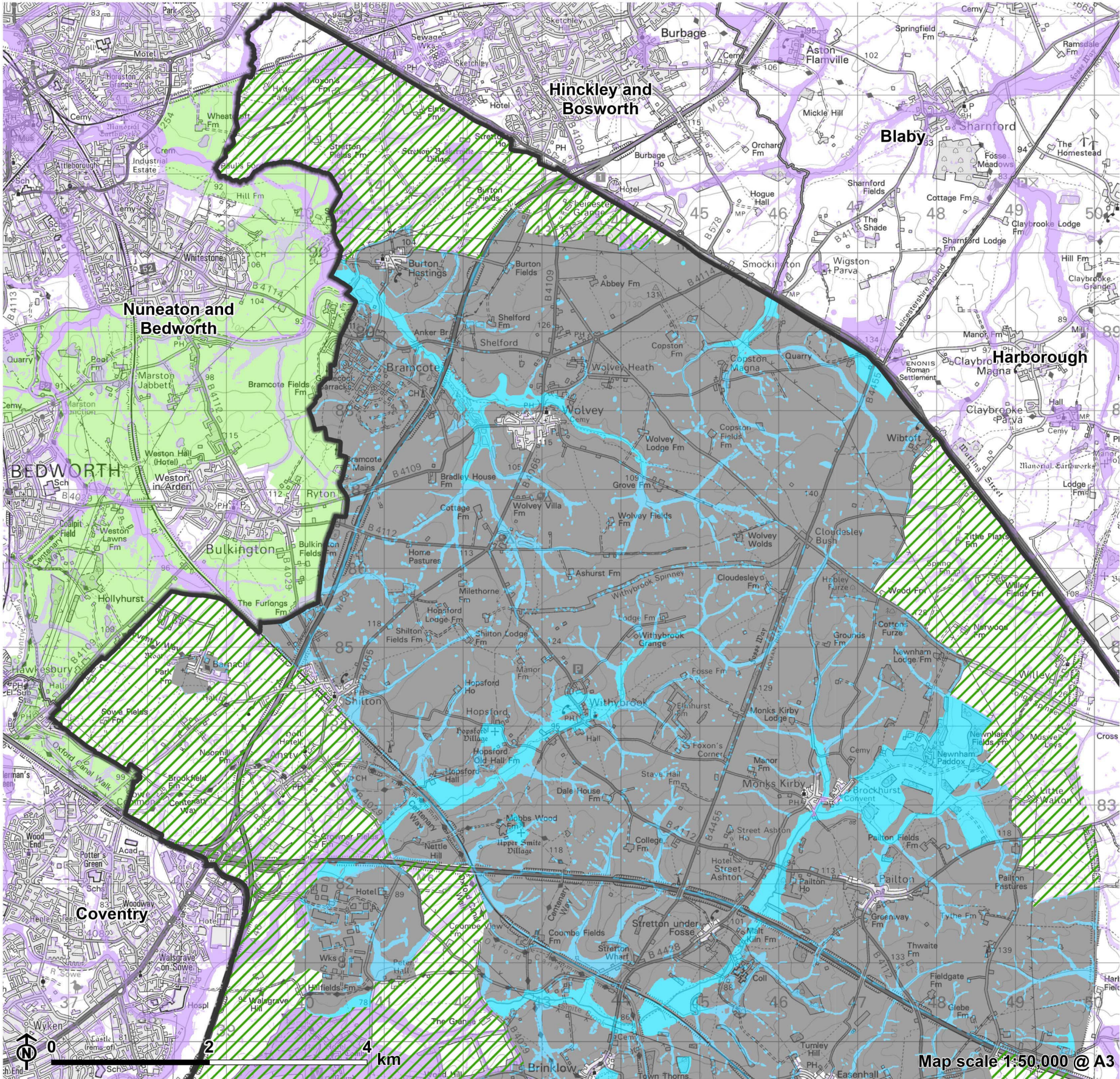









Figure 4.7: Areas suitable for definition as grey belt

-  Rugby Borough boundary
-  Neighbouring authority
-  Green Belt land outside of the borough
-  Green Belt land potentially not suitable for definition as grey belt land in the borough
-  Potentially suitable for definition as grey belt land in the borough
-  Potential grey belt land overlapping with footnote 7 designations in the borough
-  Footnote 7 designations outside of grey belt

Note:
Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and therefore should be reviewed separately. The locations of these assets are illustrated in parcel proforma reports. Each NPPF footnote 7 designation is individually mapped on Figure 3.1.

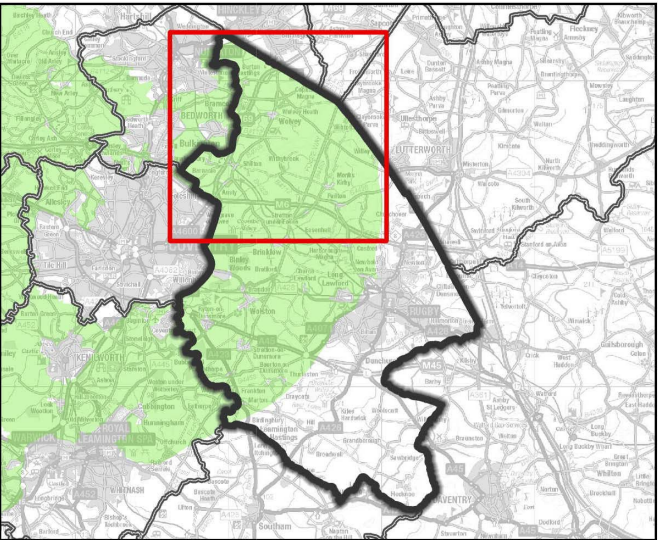
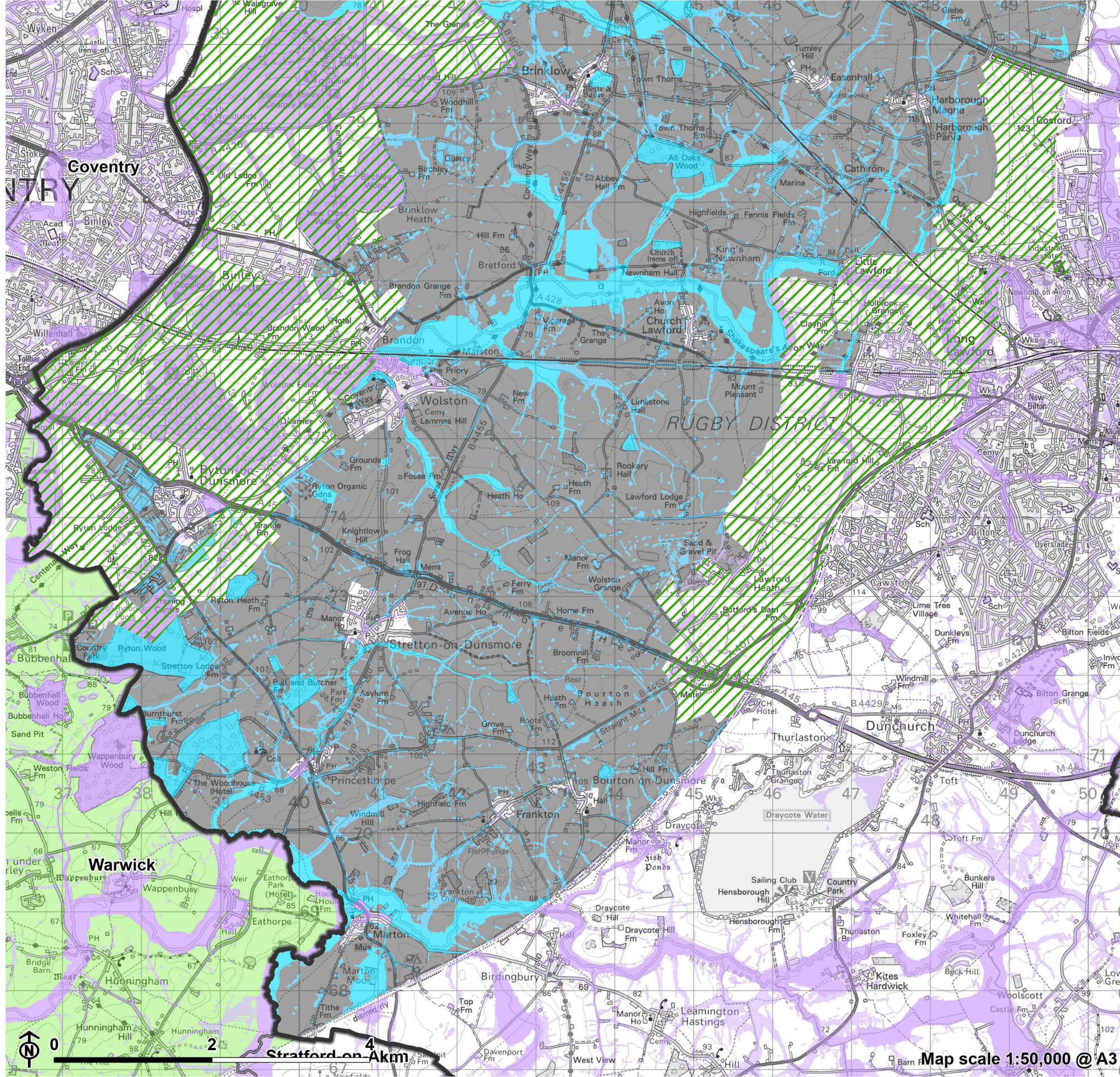
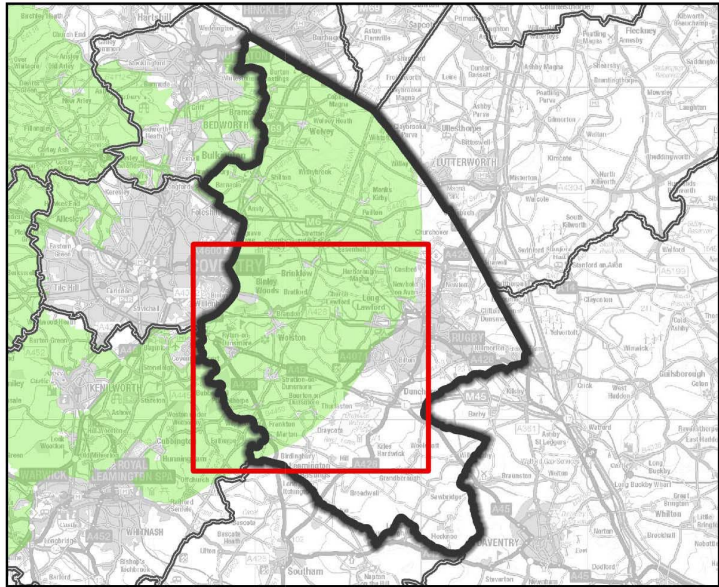


Figure 4.7: Areas suitable for definition as grey belt

- Rugby Borough boundary
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- Green Belt land outside of the borough
- Green Belt land potentially not suitable for definition as grey belt land in the borough
- Potentially suitable for definition as grey belt land in the borough
- Potential grey belt land overlapping with footnote 7 designations in the borough
- Footnote 7 designations outside of grey belt

Note:
Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and therefore should be reviewed separately. The locations of these assets are illustrated in parcel proforma reports. Each NPPF footnote 7 designation is individually mapped on Figure 3.1.



Strategic contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

4.2 Land adjacent to the inset urban edges of Coventry (including Bedworth), Nuneaton, Hinckley, Magna Park (and the associated town of Lutterworth) and Rugby is considered to make the strongest contribution to Purpose A. Major roads, rivers, railways and woodlands form well-defined boundaries beyond which no areas of less than 10 hectares within Rugby Borough have been identified as making less than a strong contribution.

4.3 In a number of locations land close to these urban edges is also playing a role in preventing sprawl and assimilation of neighbouring villages and other areas of urban development. The Green Belt PPG is clear that villages are not large built-up areas, but some are close enough to a large built-up area to be associated with it.

4.4 Key areas of separation between large built-up areas and satellite settlements, and locations where significant spread of those satellite settlements away from the large built-up areas would likely be perceived as associated sprawl, include:

- around the settlements of Binley Woods, Ryton-on-Dunsmore, Barnacle, Ansty and Shilton - associated with the sprawl of Coventry;
- around the commercial development at Ansty Park (washed-over by the Green Belt designation) - associated with the sprawl of Coventry;
- to the south of Bulkington - associated with the sprawl of Bedworth. Land to the east of the village does not make a strong contribution to Purpose A because the M69 provides strong containment;
- around the settlements of Long Lawford and Harborough Magna - associated with the sprawl of Rugby;
- between Magna Park (strongly associated with the town of Lutterworth) and Willey.

4.5 Some limited areas adjacent to satellite settlements where development would be contained and/or would not be significantly incongruous with the urban pattern have been identified, and beyond the zones around large built-up areas and associated satellite settlements contribution to Purpose A drops to weak.

Expansion of any large built-up area into this area of weak contribution would have a significant impact on this purpose, but there is some potential for the expansion of existing villages or the creation of new areas of inset development without any significant impact on the urban pattern.

4.6 Inappropriate development within the Green Belt, which may have been constructed prior to the designation of the Metropolitan Green Belt or have been permitted following appropriate demonstration of the necessary 'very special circumstances' referenced in paragraphs 153 and 154 of the NPPF, generally reduces the contribution to Purpose A. The most significant areas of inappropriate development in relatively close proximity to the large built-up area are the industrial areas Prologis Park to the west of Ryton-on-Dunsmore and Antsy Park to the south east of the junction of the M6/A46/A4600 near Mount Pleasant, which make weak contributions to Purpose A.

Strategic contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

4.7 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns. The gap between Coventry and towns to the east - Rugby and Lutterworth/Magna Park - is wide and robust, such that most land between these settlements is considered to make a moderate contribution to Purpose B. Development extending out from existing urban edges would cross clear boundary features but in terms of the size of the visual gaps between towns the impact would be limited. There is also scope for development associated with existing smaller settlements within the gaps, or new inset developments, that would result in the loss of only a small part of the gap between towns, with only a very limited impact on visual separation. Where land adjacent to existing villages is subject to some evident urbanising influence already, or where there are sizeable areas of washed-over development, contribution reduces to weak.

4.8 In the north west of the Borough, most land between Coventry, Bedworth and Bulkington also makes a moderate contribution to Purpose B. Bulkington is a village with limited separation from Bedworth, so development narrowing the gap between Coventry and Bulkington could weaken perceived separation between Coventry and Bedworth in this area, but the extent to which Coventry and Bedworth are already contiguous is a limiting factor to contribution.

4.9 Land in the far south of the Borough is not considered to lie in a gap between neighbouring towns – Rugby and Royal Leamington Spa are over 13km apart – and so makes no contribution to Purpose B.

4.10 The narrowest gap is in the north-east of the Borough, between Nuneaton and Hinckley. Outside of the Green Belt there is only fragile separation between these towns, where they almost adjoin along the A5, but elsewhere the gap is more defined. Within the Green Belt, the broad but shallow valley associated with Yarrow Brook is almost entirely undeveloped and plays an important role in maintaining visual separation. This is the only area within the Borough considered to make a strong contribution to Purpose B.

Strategic contribution to Green Belt Purpose C – to assist in safeguarding the countryside from encroachment

4.11 The vast majority of the Green Belt in the Borough is open and has strong distinction from the Borough and neighbouring authorities' urban areas, and therefore makes a strong contribution to Purpose C. This includes land adjacent to the large urban areas on the outer edges of the Green Belt where, as noted under the Purpose A analysis, major roads, rivers, railways and woodlands form well-defined boundaries. Some defined areas of land adjacent to villages are subject to sufficient urbanising influence to make only a moderate contribution. One area of washed-over development, Prologis Park at Ryton-on-Dunsmore, is sufficiently developed to make only a weak contribution.

Strategic contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

4.12 As noted in Chapter 3, despite some intervisibility between Rugby's Green Belt and historic towns, no connection of notable significance was found between the Green Belt and their historic settings and significance. This is considered to be driven largely by the fact that the historic areas of the settlements do not lie in close proximity to the Green Belt, separated physically by the modern expansion of the settlements.

4.13 Rugby's Green Belt is therefore not considered to make a notable contribution to preserving the setting and special character of historic towns. It

is important to note that this does not mean that Rugby's settlements and neighbours do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

Strategic contribution to Green Belt Purpose E – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

4.14 All the borough's Green Belt is judged to make an equally strong contribution to Green Belt Purpose E in acknowledgement of the significant role it has and continues to play in encouraging the recycling of derelict and other urban land in the adjacent urban areas.

Areas identified as grey belt

4.15 As noted above, there are only relatively small areas where the Green Belt does not make at least one strong contribution to at least one Green Belt purpose. However, only Purposes A, B and D are considered relevant to the identification of grey belt. As no land has been identified as making a significant contribution to Purpose D, only areas of the Borough's Green Belt which make a strong contribution to either Purpose A or Purpose B are considered to not meet the definition of grey belt.

4.16 On this basis, as illustrated in **Figure 4.7**, the central core of the Borough's Green Belt, extending down to its southern edge, is categorised as grey belt.

This reflects two principal factors:

- The location of large built-up areas around the fringes of Rugby's Green Belt, rather than inset within it; and
- The breadth of the gap between towns to the east and west of the Green Belt, and relatively small size of inset villages and other areas of development in between, including a lack of substantial sprawl along the major routes connecting the larger urban areas.

4.17 This pattern of grey belt, focused on the core rather than the fringes of the area, is indicative of a strong Green Belt where it is not extensive urbanising

influences that have resulted in definition of large areas grey belt but, rather, the absence of significance of Purpose C to the assessment process.

Potential for fundamental impact on remaining Green Belt land

4.18 The vast majority of the Borough's Green Belt land contributes strongly to at least one Green Belt purpose (most commonly Purpose C). This can be attributed to the fact that the vast majority of the Borough's Green Belt is open, free from significant containing and urbanising influences and has a stronger association with the wider countryside than urban areas.

4.19 The area of strongest overall contribution to Green Belt purposes is in the north of the Borough, where the proximity of the urban edges of Hinckley and Nuneaton combined with presence of strong urban boundaries and absence of significant development within the Green Belt means that land makes a strong contribution to purposes A, B and C.

4.20 Much of the land along the outer edges of the Green Belt to the east and west makes a strong contribution both to Purpose A and Purpose C, due to proximity to large built-up areas combined with a sense of distinction from those settlements and their urbanising influence.

4.21 Reflecting the strength of the Borough's Green Belt, there are few locations where contribution to the Green Belt purposes suggests a fragility that would mean that development of a strategic scale (ten hectares in the context of this study) would be certain to result in fundamental impact on remaining Green Belt land. The most likely would be the area between Hinckley and Nuneaton, where any development in the Borough would represent the breach of a clear and consistent boundary feature (either the A5, the railway line, Harrow Brook or the River Anker) and would be likely to weaken the integrity of adjacent Green Belt land in relation to Purpose A, B and C. However, with regard to the role of the Green Belt in separating towns, the absence of Green Belt protection for the gap between Hinckley and Nuneaton to the north could be taken to suggest that separation of these towns is not considered to be of fundamental importance.

4.22 It is also noted that a narrow corridor of land to the south of the A5 at Hinckley is excluded from the Green Belt, such that the main road itself is not technically the Green Belt boundary, but as any development here would still be

very linear in character and associated with the A5 this is still considered to represent a consistent edge to the town.

4.23 In addition to its role alongside Hinckley, the A5 forms a strong edge to Magna Park, and alongside Coventry the A46 and the M6 are strong boundary features, so any substantial development could have a significant impact in terms of perceived sprawl beyond consistent boundaries. However, the size of the gaps between towns means that there is potential for alternative boundaries to be established without fundamental impact on the separation of towns.

4.24 The core Green Belt area is as a whole playing a fundamental role in preventing the merger towns, and the substantial sprawl that this would also reflect. It also forms the rural centre of the Borough, where any substantial development is likely to be encroaching on countryside. However, as its identification as grey belt suggests, there is scope for expansion of smaller settlements within this area, or creation of new developments, that would not fundamentally harm the Green Belt purposes.

Chapter 5

Next Steps

5.1 This study has assessed contribution to the Green Belt purposes at a strategic level, applying the PPG issued in February 2025 in relation to the identification of grey belt. As a result, areas of grey belt or provisional grey belt have been identified and the potential for fundamental impact on the Green Belt purposes has been considered.

5.2 Potential development sites can be overlaid on the mapping generated by the study to give an indication of the harm to the Green Belt purposes of releasing and/or developing land, but the potential for reduced contribution ratings for sites below the ten hectare minimum size threshold needs to be taken into consideration, and a finer-grained analysis carried out where appropriate.

5.3 Where areas have been identified as provisional grey belt, due to the presence of areas/assets identified in footnote 7 of the NPPF, judgement will need to be made as to whether policies relating to those areas/assets provide a strong reason for refusing or restricting development, such that land should not be considered grey belt.

5.4 The identification of land as grey belt does not mean that development within it will be 'not inappropriate'. As set out in NPPF paragraph 155, consideration will need to be given as to:

- Whether the development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. For the grey belt area that forms the central core of the Borough's Green Belt, the scale of any new development would clearly be a significant factor in the extent to which the Green Belt purposes might be undermined.
- Whether there is a demonstrable unmet need for the type of development proposed.
- Whether the development would be in a sustainable location.
- Whether, where applicable, the proposed development meets the 'Golden Rules' (set out in NPPF paragraphs 156-157).

References

- 1 LUC, Joint Green Belt Study for Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council (2015-2016).
- 2 The consultees queried the categorisation of all settlements larger than villages (that is, towns) as large built-up areas. In response the methodology was refined to clearly identify the large built-up areas within the Borough, with clear justification for their inclusion in this category.
- 3 Dr Charles Goode, The History of Regional Planning: The West Midlands Green Belt, RTPI Presentation
- 4 Ministry of Housing, Communities and Local Government (2023) National Planning Policy Framework. Available at: [National Planning Policy Framework \[pdf\]](#)
- 5 Ministry of Housing, Communities and Local Government (2025) Planning Practice Guidance (PPG), Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>.
- 6 Footnote 55 of the National Planning Policy Framework (December 2024.) Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 7 Rugby Borough Council, Rugby Local Plan (2011-2031). Available at: <https://www.rugby.gov.uk/w/local-plan-2011-2031>
- 8 Rugby Borough Council, Rugby Local Plan Review Issues and Options Consultation (October 2023). Available at: <https://www.rugby.gov.uk/w/local-plan-review-issues-and-options-consultation>
- 9 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.
- 10 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).
- 11** 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.
 - 12** Some Irreplaceable Habitat data sets are more up-to-date than others. Consequently, their extent mapped in this study may require refinement following detailed site specific work through the typical development management process.
 - 13** Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916)
 - 14** 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.
 - 15** 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.
 - 16** 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.
 - 17** Nuneaton and Bedworth Borough Council (2021) Conservation Area Appraisals And Management Plans SPDs. Available at: <https://www.nuneatonandbedworth.gov.uk/downloads/download/110/conservation-area-appraisals-and-management-plans-spds>
 - 18** Coventry City Council (2024) Conservation Areas. Available at: <https://www.coventry.gov.uk/heritage-ecology-trees/conservation-areas/8>
 - 19** Hinckley and Bosworth Borough Council (2024) Conservation Areas. Available at: https://www.hinckley-bosworth.gov.uk/info/200023/conservation/253/conservation_areas/2

- 20** Rugby Borough Council (2024) Rugby Borough Conservation Area Appraisals. Available at: <https://www.rugby.gov.uk/w/conservation-area-character-appraisals>
- 21** 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>