

## Appendix 3

### Method Statement Consultation

The following Local Authorities were consulted on the method for the Joint Green Belt Review:

- Derbyshire County Council
- Leicestershire County Council
- Staffordshire County Council
- Warwickshire County Council
- West Northamptonshire Joint Planning Unit
- Birmingham City Council
- Blaby District Council
- Bromsgrove District Council
- Cherwell District Council
- Cotswolds District Council
- Daventry District Council
- Harborough District Council
- Hinckley and Bosworth Borough Council
- Lichfield District Council
- North West Leicestershire District Council
- Redditch Borough Council
- Solihull Metropolitan Borough Council
- South Derbyshire District Council
- South Northamptonshire District Council
- Tamworth Borough Council
- West Oxfordshire District Council
- Wychavon District Council

The table below outlines the consultation responses received in relation to Joint Green Belt Review Method Statement and Steering Group's responses.

Respondent	Section	Comment	Response to comments
West Northamptonshire Joint Planning Unit	General	I confirm that the West Northamptonshire Joint Planning Unit is content with the proposed methodology of the Green Belt Review and we have no further detailed comments on the Method Statement.	Noted.
Birmingham City Council	Table 1.1 – Green Belt review criteria	The Green Belt review criteria 1.b and 3.a are identical, as are criteria 2.b and 3.a, which would result in double counting of scores.	<p>Criteria 1b and 3a are similar but this is because Green Belt purposes 1 and 3 are similar. However, there are differences:</p> <ul style="list-style-type: none"> <li>• Criterion 1b assesses the degree openness of the Green Belt within a parcel. All built development within a parcel can compromise openness.</li> <li>• Criterion 3a assesses the encroachment of the countryside, i.e. the intrusion or gradual advance of buildings and urbanising influences beyond an accepted or established urban edge. Built development which effects openness does not necessary have an urbanising influence on the countryside and therefore may not be considered encroachment, e.g. agricultural or forestry related development or isolated dwellings and historic schools/churches can contribute to the countryside's rural character.</li> </ul> <p>Before acknowledging the presence of urbanising influences in the assessment of purpose 3 an additional question has been added to criterion 3a to determine whether parcels contain land with the characteristics of countryside and/or are connected to land with the characteristics of countryside. By asking this question first, we can determine whether there is any countryside to be encroached upon before we</p>

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			<p>identify any urbanising influences. A definition of countryside has been added to the assessment method notes: 'Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.'</p> <p>An additional question has been added to the assessment of criterion 2a. The question asks whether a parcel of land being assessed is within an existing settlement as opposed to being on its fringe. Parcels considered to be within an existing settlement automatically score 0 against criterion 1a based on the agreed assumption that these pockets of Green Belt within settlements do no play a role in preventing merging with neighbouring settlements.</p> <p>Finally, in a bid to simplify the assessment of Purpose 2, criterion 2b was deleted. Criterion 2b considered the role of 'significant boundaries' inhibiting the merging of neighbouring settlements. However, it is considered that the width of the gap between settlements assesses in simple terms the role of the Green Belt preventing merging. The role of 'significant boundaries' is considered thoroughly in the assessment of parcels against criterion 3b for Purpose 3. The assessment method notes for criterion 3b have been amended to include a clearer definition of what constitutes a significant boundary.</p>
	Table 1.1 – Green Belt review criteria	The definition of "less significant boundaries" could also include local roads and lanes if "significant boundaries" are only defined as railways, rivers, motorways/ dual carriageway.	The assessment method notes for criterion 3b have been amended to include a clearer definition of what constitutes a significant boundary in relation to Purpose 3: 'The significance of boundaries within and in close proximity to the parcel will be determined by the boundaries' role in inhibiting encroachment of the countryside. This role is defined by the location of boundaries, i.e. boundaries close

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			to the existing urban edge are more significant than those further away, and the type of boundary: Significant boundary = railway, river, motorway/dual carriageway; Less significant boundary = stream/canal, topography / steep slope.'
Cherwell and South Northants Councils	Context for the Review	Paragraphs 1.12 to 1.16 provide some background to the Green Belt review, but it is unclear whether the "exceptional circumstances" required to justify a Green Belt review will be set out in this report, or subsequently in relevant Development Plans.	<p>While the assessment of performance against the GB purposes could contribute to a case for 'de-designating', the relatively poor performance of the land against Green Belt purposes is not, in itself, an exceptional circumstance that would justify release of the land from the Green Belt. There would need to be:</p> <ol style="list-style-type: none"> <li>1) Other exceptional circumstances, such as housing, education or employment needs that cannot be met on alternative, non-Green Belt sites.</li> <li>2) Demonstration that the release of the land would not cause significant harm to the remaining Green Belt (which is where master planning and good design comes in to play).</li> </ol> <p>It could indeed be argued that high performing Green Belt should be removed; for example because the Borough want to focus development around railway stations for reasons of sustainability. As such, this study should be seen as only one element of an assessment as to whether land should be deleted from the Green Belt to facilitate development based on exceptional circumstances.</p> <p>In order to protect the robustness and objectivity of the assessment of Green Belt against the purposes, we feel it is important to keep any further assessment work separate.</p>
	Methodology	Task 2: Should the primary constraints also include Ancient Woodland and AONBs, or are these not relevant to the	Ancient Woodland and Areas of Outstanding Natural Beauty are not considered primary constraints as some

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		study area?	developments may be appropriate within them.
	Methodology	<p>Task 5- 4. To preserve the setting and character of historic towns- the criteria seems to be narrowly defined, related only to conservation area designation. Is this because of the character of the towns in the study area? Ordinarily the character and setting of historic towns would be dependent on a range of factors including protection of important views, openness of the surrounding countryside etc.</p>	<p>The assessment against of purpose 4 (to preserve the setting and special character of historic towns) of the Green Belt purposes is proportionate and appropriate to a Green belt review. It assessed the contribution of Green Belt parcels to the setting and special character of a defined list of historic towns agreed by the Steering Group: :</p> <ul style="list-style-type: none"> <li>• Coventry</li> <li>• Rugby</li> <li>• Bedworth</li> <li>• Nuneaton</li> <li>• Warwick</li> <li>• Kenilworth</li> <li>• Royal Leamington Spa</li> <li>• Coleshill</li> <li>• Stratford-upon-Avon</li> <li>• Alcester</li> <li>• Henley-in-Arden</li> <li>• Studley</li> </ul> <p>Topographic mapping is used to inform desk based judgements as to whether land parcels have good intervisibility with the historic core of an historic town, or form a visual backdrop to the core before site visits are undertaken.</p>

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	Reporting	Will the findings of the Final Report set out the assessment of the "broad areas" of Green Belt in addition to the individual parcels?	Yes.
Lichfield District Council	Consultation	Lichfield District Council is disappointed by the very short timescale which has been provided for a response to be made, particularly given that this is being treated as a formal Duty to Co-operate matter.	Noted.
	Review Stages	Why is the review being split in to two parts with North Warwickshire and Stratford upon Avon being considered at a later date? This is not explained. What are the timescales for each stage?	North Warwickshire Borough Council's Local Plan has recently been adopted and Stratford District Council's Core Strategy is at examination. Consequently, this Study will inform the future review of their respective Plans. Consequently, it is intended to carry out Stage 2 to cover these two local authorities towards the end of 2015.
	Review Purpose and Timescales	What is the purpose of this review, and what planning period is it intending to cover? Is it informing the development and progression of the emerging Local Plans (the stage 1 authorities) listed in paragraphs 1.17 to 1.23? How does this tie in with the other Local Plans in the study area (e.g. North Warwickshire's adopted Local Plan). The status of the Stage 2 authorities Local Plans needs to be explained.	<p>The review determines whether the existing Green Belt within the study area meets the purposes set out in the NPPF. The review informs the plan-making processes of all Local Authorities involved, complementing separate reviews of housing capacity, employment land, infrastructure needs and retail needs.</p> <p>The review does not identify land for removal from Green Belt; its role is not to find the necessary exceptional circumstances for alterations to these designations, but to provide evidence on the relative performance of land parcels against the Green Belt purposes. Should the Local Authorities conclude that there are exceptional circumstances for making alterations to the existing Green Belt boundaries, these changes, including any allocations of land for development, will be taken forward through their respective Local Plan-making processes.</p>

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	Broad Areas	<p>Paragraph 1.38 states 'these broad areas of Green Belt are assumed to be likely to make a considerable contribution to the Green Belt purposes as they represent the main 'body' of the Green Belt, rather than land at the edges...'. The reasoning for this needs to be made clear: are all the plans at stage 1 sufficiently advanced to be able to justify this spatial, settlement focused approach to the distribution of development? How are longer term issues to be considered in this context including the consideration of potential options for the Birmingham / GBSLEP housing 'overspill' issue? How will the review be applied to the Plans for the 'stage 2' authorities? Whilst Lichfield District Council is supportive of the approach of assessing all of the Green Belt in the study area, more locally applicable strategic context needs to be provided.</p>	<p>Given the strategic nature of the Green Belt designation, broad areas away from the urban edge can be expected to make a considerable contribution. If a local authority's spatial strategy focuses on larger urban extensions or new settlements, the case would need to be made for an incursion into a broad area and exceptional circumstances demonstrated.</p>
	Broad Areas	<p>Whilst Lichfield District Council understands and supports the principle of looking at some areas in more detail than others (although the context needs to be explained), the outcome of the 'broad brush' reviews needs to have a mechanism built in to allow for further, more detailed review to be undertaken once the outcome of the broad brush assessment is complete. This enables flexibility to be built-in, thus not precluding or pre-determining options which may need to be considered in the light of emerging long term strategic growth needs in the wider region. Local Plans are being required by Planning Inspectors via their EiPs to include provision for early review of Plans should these local authorities be required to take additional growth and new Green belt reviews should reflect this possibility.</p>	<p>The Joint Green Belt Review does not preclude detailed assessment on broad areas. More fine grain assessments could be undertaken of broad areas, as and when development options by individual local authorities are considered – in order to minimise harm to the rest of the Green Belt.</p>