



**Land at Westwood  
Heath Road**

**Landscape and Green  
Belt Matters**

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On behalf of:  
**Rainier Real Estates Ltd**

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## Section 1

### Introduction and Key Findings

- 1.1 Rainier Real Estates Ltd have appointed The Environmental Dimension Partnership Ltd (EDP) to undertake a series of environmental appraisals on a site known as Land at Westwood Heath Road, in Coventry (hereafter referred to as 'the site'). The location and boundaries of the site are illustrated on **Image EDP 1**.
- 1.2 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors, in the fields of landscape, ecology, heritage, arboriculture and masterplanning. EDP is a Registered Practice of the Landscape Institute and a Corporate Member of IEMA. The Practice operates throughout the UK from offices in Cirencester, Cheltenham and Cardiff. Details of the Practice can be obtained at [www.edp-uk.co.uk](http://www.edp-uk.co.uk).
- 1.3 To date, the purpose of EDP's work has been to gain an understanding of the environmental issues likely to affect the site's 'in principle' suitability for development and its potential capacity. To this end, the following specific work items have been undertaken:
- Data trawl of relevant landscape designations and considerations and assessment of the site's character and zone of primary visibility (ZPV); and
  - Data trawl of relevant designated heritage assets.
- 1.4 The site sits on the south-western edge of Coventry, to the south of Westwood Heath Road. The site comprises a single plot, which is currently in use as a builder's yard. The site context is illustrated in **Image EDP 1.1**.

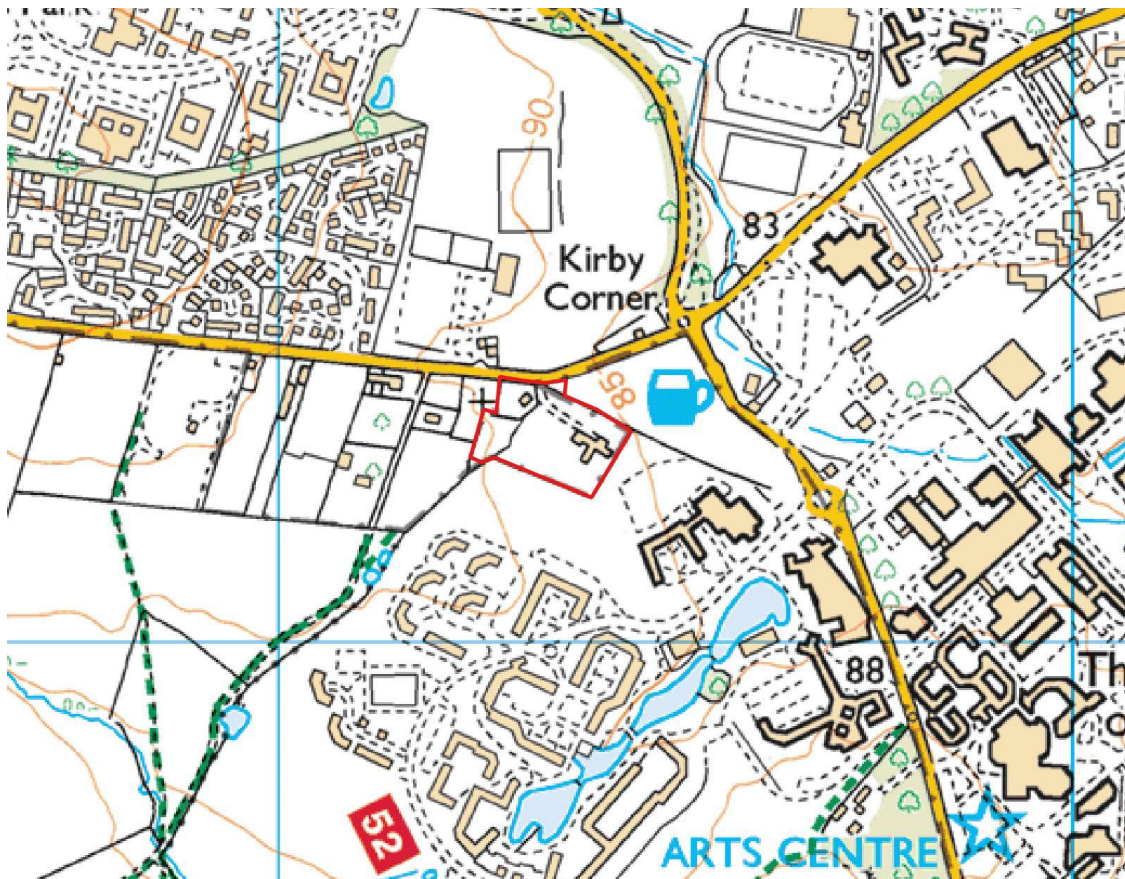


Image EDP 1.1: Site Location Plan

## KEY CONCLUSIONS OF EDP'S ASSESSMENTS

- 1.5 EDP has not found any 'in principle' issue, which would preclude the site's allocation for built development; indeed, it is not especially constrained in environmental terms. Due to the current land use of the site there is the opportunity for enhancement.

### Landscape Matters

- 1.6 Due primarily to the enclosure created by existing landscape features within the site and immediate context and the prevailing site use and existing built form, the site has a heavily reduced landscape sensitivity.
- 1.7 The site is not perceptible from the wider setting and has well-established urbanising influences in close proximity to it, being well contained by both existing built form and mature landscape features. It is likely that the majority of landscape and visual effects resulting from proposed development within the site would be limited to the site itself and receptors immediately adjacent to the site. The site gives good opportunity for the enhancement of landscape fabric and features.
- 1.8 The development of the site provides an opportunity to enhance and augment the current character of the site which currently comprises a building yard. Further, landscaping

measures included within the promoted development would be able to provide targeted mitigation where necessary.

### **Green Belt Matters**

- 1.9 Whilst the site is not currently within the Green Belt, as safeguarded land, if the land were to be reviewed against GB purposes as part of any future Green Belt review (or should the review of strategic development within South Warwickshire fail to come forward) then it is clear that the site makes a limited contribution to Green Belt purposes and would justify removal from the designated Green Belt. Development within the site, would avoid the creation of Green Belt 'islands' which policy GB2 seeks to avoid. If the land were retained in the Green Belt, it would constitute 'Grey Belt' in any event under NPPF 2024 Annex 2 definition, whereby development would not be inappropriate.

### **OVERALL CONCLUSION**

- 1.10 For the above reasons, EDP's overall conclusion at this stage is that the site is eminently suited to accommodate some development to help meet the Council's housing need and is capable of being developed in accordance with relevant environmental policy at local and national levels.
- 1.11 Further detail of EDP's desk and field assessments can be found within **Sections 2-3**.



## Section 2

### Landscape and Visual Matters

- 2.1 Following desk-based analysis of local landscape-related planning policy, designations and character, a site appraisal was undertaken by an experienced Landscape Architect. This involved walking and driving the local area to understand the character of the site and context and to assess the likely landscape and visual effects that would arise from development of the site.

#### LANDSCAPE-RELATED DESIGNATIONS

- 2.2 Whilst the site is entirely within the green belt, there are no national or local landscape designations located within the broad study area.

#### LANDSCAPE CHARACTER

##### EDP's Assessment

- 2.3 The site is situated to the south of Westwood Heath Road and is enclosed by vegetation (**Image EDP 2.1**), contains and is adjacent to built development. The site has a heavily developed urban character, due to the current land use.



**Image EDP 2.1:** Taken from the approx. centre of the site facing south.

- 2.4 The site is currently a builder's yard and utilised for the storage of materials (e.g. **Image EDP 2.1**). At the north-western and southern parts of the site are buildings comprising a two-storey brick-built cottage with single storey outbuildings towards the rear. Otherwise, the site comprises a mix of crushed rubble and tarmac hardstanding and areas of scrub.
- 2.5 As discussed above, due the site's current use, topography and surrounding vegetation, there are no opportunities for views into the site apart from when passing the site immediate site entrance.
- 2.6 Topographically the site is relatively flat.
- 2.7 In summary, the main character and fabric of the site is the influence of the current 'brownfield' site use.

***Conclusions in respect of Landscape Matters***

- 2.8 From a landscape perspective, it is EDP's opinion that there are no 'in principle' constraints with regard to future built development of the site. Furthermore, landscaping measures included within any promoted development would be able to provide targeted mitigation where necessary, which would be effective at promoting biodiversity gains.



## Section 3 Green Belt Matters

### GREEN BELT MATTERS

- 3.1 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are openness and permanence. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.
- 3.2 The National Planning Policy Framework (NPPF) sets out five purposes of the Green Belt, which are listed below:
- *“To check the unrestricted sprawl of large built-up areas;*
  - *To prevent neighbouring towns merging into one another;*
  - *To assist in safeguarding the countryside from encroachment;*
  - *To preserve the setting and special character of historic towns; and*
  - *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 3.3 The NPPF sets out guidelines for local planning authorities (LPA) in relation to Green Belts including: the desire to plan positively to enhance their beneficial use; looking for opportunities to provide access, outdoor sport, and recreation; and to retain and enhance landscapes, visual amenity, and biodiversity; or to improve damaged and derelict land.
- 3.4 NPPF guidance makes clear that, when reviewing Green Belt boundaries, LPAs should take account of the need to promote sustainable patterns of development; they should consider the consequences for sustainable development of channelling development towards urban areas, towns and villages within the Green Belt or towards locations outside the Green Belt boundary.
- 3.5 Also of relevance to this report is guidance with regard to defining boundaries, which states that local authorities should inter alia:
- *“Not include land that it is unnecessary to keep permanently open; and*
  - *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*
- 3.6 Local Green Belt policy of relevance to the site is contained within Coventry Local Plan most notably, the site is subject to Policy GB2: Safeguarded Land in the Green Belt. The Policy states that development within these sites will be considered as part of a partial or full review, with consideration of development to the south, within Warwickshire. A key objective

of Policy GB2 is to avoid creating Green Belt 'islands' when considered alongside consenting and allocations associated within Warwick District's administrative boundaries.

### **Green Belt Review**

- 3.7 It has been established by case law (Appeal Ref APP/P2935/A/14/3000634) that openness is defined by *“an absence of buildings or other forms of development.”* However, the case of Turner<sup>1</sup> is important as it makes clear that a visual dimension should be included within any Green Belt Assessment.
- 3.8 As set out within the case of Turner *“there are a range of spatial factors, of which volumetric matters may be a material concern, but they are by no means the only one”* (paragraph 14). In addition, the Turner case confirms that *“openness can have a visual dimension”*, although *“an absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt”* (paragraph 25).
- 3.9 With reference to *“how built up the Green Belt is now and how built up it would be if redevelopment occurs”* (paragraph 14) and the visual dimension of openness, **Table EDP 3.1** below presents the results of the consideration of the site against the main purposes of Green Belt in landscape and visual terms, applying criteria based on the detailed site-specific study.

**Table EDP 3.1:** Green Belt Review of the Site and Its Context

<b>Green Belt Criteria</b>	<b>Application of Criteria to Site</b>
<b>Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas</b>	
Located at the edge of a large built-up area (as defined by the LPA).	The site is located adjacent to the large built-up area. Whilst some of the site constitutes vegetation, there is very limited degree of openness, being located immediately adjacent to the settlement edge and containing mostly previously developed, or brownfield land enclosed by development on three sides. The site provides limited contribution to the separation between any neighbouring built up areas.
Creates a clear, recognisable distinction between urban fringe and open countryside.	The site's location and current land use results in it providing a limited contribution, in landscape and visual terms, to the clear distinction between the urban fringe and the wider open countryside, in Green Belt terms, it currently constitutes an 'Island' with consideration of the wider development to the south, within the adjoining LPA associated with Warwick University Campus and consented by Warwick District Council. There are extensive areas of development within the site. The site is contained by a road network and well vegetated boundaries.

<sup>1</sup> John Turner v Secretary of State for Communities and Local Government and East Dorset District Council [2016] EWCA Civ 466

Green Belt Criteria	Application of Criteria to Site
Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary. Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts and streams. Fences do not form defensible boundaries.	Mature boundary features, aligning the site's boundaries, afford a sense of visual enclosure, as does the road network to the north. The site has a robust and defensible boundary, which can be subject to additional reinforcement and will be present well beyond the plan period.
<b>Purpose 2: To Prevent Neighbouring Towns Merging Into One Another</b>	
Settlements maintain a sinuous edge.	The site abuts the settlement boundary and is otherwise enclosed by a combination of built form on three sides and mature landscape features.
Prevent loss or noticeable reduction in perceived distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap.	In landscape and visual terms, the site does not form part of a perceived gap between settlement areas.
The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent perceived merging.	Development within the site would not result in any visual association with any other settlement.
<b>Purpose 3: To Assist in Safeguarding the Countryside from Encroachment</b>	
The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.	The site comprises some limited representative key characteristics, not all of them contributing positively to the local context, furthermore, the site is greatly developed and in a poor condition.
Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	There are many detractors and urbanising features affecting the site, including the influence of existing built form of Warwick University Campus and the adjacent road network.

Green Belt Criteria	Application of Criteria to Site
<b>Purpose 4: To Preserve the Setting and Special Character of Historic Towns</b>	
In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to a Conservation Area which relates to the historic character of a town.	The site does not share a boundary with a Conservation Area and/or there is no intervisibility with the historic core of the nearest settlement.
<b>Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land</b>	
Purpose 5 considers whether or not sites can be 'recycled' or redeveloped, such as brownfield land within the Green Belt.	The site contains brownfield and previously developed land, currently used as a builder's merchant, which this purpose seeks to encourage.

- 3.10 It is clear that the site makes a very limited to no contribution to the Green Belt overall.
- 3.11 What this review of the site in terms of the main purposes of Green Belt shows is that, rather than being a high functioning part of the Green Belt which contributes highly towards the main function of keeping land 'permanently open', overall, it is an enclosed site, characterised by existing built form and urbanising elements, which is seen by relatively few receptors in relatively close proximity to it. The site does not play a fundamental role in relation to the wider Green Belt Parcel, and if developed would not harm the performance of the wider strategic Green Belt. Development within the site, would avoid the creation of Green Belt 'islands' which policy GB2 seeks to avoid.

## **NPPF 2024 and PPG 2025**

### ***New Paragraph 155***

- 3.12 The previous paragraph 154 is replaced by new paragraph 155 requires that:
- "155. The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:*
- a. 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."*
- 3.13 This is helpful in that while residential development on any undeveloped, open, Green Belt land would generally, by its nature, have a 'greater impact' on the openness of the green belt than exists on the Site already, it would not necessarily 'fundamentally undermine' the wider Green Belt.
- 3.14 In relation to the Site and the surrounding landscape, they are open in so far as they do not contain development of a scale, character or form that has a significant impact on Green Belt openness. While development of the Site might be seen to have 'greater impact' on the

openness of the Green Belt than exists on the Site already, it would not fundamentally undermine the performance of green belt land outside the site in part due to its relatively small scale in relation to the wider green belt and containment.

#### **Footnote 7**

- 3.15 The first test is to determine whether the Site constitutes land within or contains assets listed in footnote 7 - i.e. habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest (SSSI); Local Green Space; a National Landscape (formerly Area of Outstanding Natural Beauty), a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

#### **Contribution**

- 3.16 The second test determines whether the Site is considered to be 'Grey Belt' is whether it does not strongly contribute to any of the following Green Belt purposes (a) check the unrestricted sprawl of large built-up areas; (b) prevent neighbouring towns merging into one another; or (d) preserve the setting and special character of historic towns.
- 3.17 When determining therefore if the site constitutes 'Grey Belt', it should be noted that:
1. The area proposed for development does not constitute land within or contain assets listed in footnote 7;
  2. As detailed above, the Site does not strongly perform against any Green Belt purpose;
  3. The site makes no contribution to preventing neighbouring towns from merging into one another; and
  4. The site is not considered to make any contribution to preserving the setting and special character of historic town.
- 3.18 The Site therefore does not 'strongly contribute' and constitutes grey belt land.

## **Section 4**

### **Summary and Conclusions**

- 4.1 When the findings of EDP's review and assessment, are tested against the NPPF (2023), (2024) and Green Belt PPG (2025), the site comprises grey belt land and development of the Site would not be inappropriate in terms of Green Belt release.
- 4.2 EDP's findings suggest that by virtue of the site's visual and physical association with existing built form within and surrounding the site. Removal of this Green Belt Island, and development within would not give rise to any effects on the strategic aspirations of Green Belt policy.





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