

LONDON BOROUGH OF REDBRIDGE

GREEN BELT REVIEW

JANUARY 2016



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1 INTRODUCTION

1.1 The purpose of this draft review

- 1.1.1 The London Borough of Redbridge is currently preparing their Local Plan 2015 2030. As part of the process of developing this Local Plan the Council commissioned and undertook a range of studies assessing the Borough's Green Belt.
- 1.1.2 The original Green Belt review was carried out by Colin Buchanan with Wardell Armstrong and the University College London in 2010. The Borough produced an Addendum to this review in 2013, which was then updated in 2015.
- 1.1.3 Wardell Armstrong has been commissioned by London Borough Redbridge to collate the findings of these studies together in one report and undertake a fresh review of the Green Belt within the Borough. This involved updating the existing Green Belt studies to ensure their consistency with current policy, and to confirm that their conclusions are still valid.

1.2 Summary of the 2010 Green Belt review

- 1.2.1 In 2010 Colin Buchanan, with Wardell Armstrong and University College London, undertook a Green Belt review on behalf of the London Borough of Redbridge in order to inform the first version of the Council's revised Core Strategy. The aim of the study was to identify areas of land that were contained within the Green Belt which no longer fulfilled the objectives of national planning policy for Green Belts, which at the time was Planning Policy Guidance 2 (PPG2), which was superseded by the National Planning Policy Framework (NPPF) in March 2012. The review informed decisions about possible changes to Green Belt boundaries.
- 1.2.2 The study was split into a number of stages. Stage 1 identified areas of Green Belt and set out details of their history, development pressures, policy constraints and analysis of the area's role and function. Stage 2 split the identified Green Belt into sixteen parcels and provided information on each parcel's ownership, use, planning history, and other significant policy constraints. In Stage 3, a desk-based study (Stage 3A) assessed each parcel against the national purposes of the Green Belt; an interpretation of these purposes at a local level; and environmental and planning policy constraints. This was followed by a site study, assessing each parcel against the same criteria (Stage 3B). Both stages gave conclusions as to whether the parcels should remain within the Green Belt, or whether they could potentially be sub-divided or removed from the Green Belt.



1.2.3 The Green Belt was divided into 16 parcels, set out in table 1.1 below.

Table 1.1, The Sixteen Parcels Identified in the 2010 Green Belt Review

Parcel reference	Parcel name
GB01	Wanstead Flats
GB02	Wanstead Park
GB03	Snaresbrook Crown Court and Walthamstow
GB04	Woodford Green
GB05	Epping Forest Hatch and Woodford Golf Course
GB06	Reed's Forest
GB07	Knighton Wood
GB08	Ray Park
GB09	Roding Valley Park
GB10	Roding Lane North
GB11	Roding Hospital
GB12	Claybury Hospital
GB13	Hainault Fields
GB14	Fairlop Plain
GB15	Hainault Forest
GB16	King George / Goodmayes Hospitals

- 1.2.4 The review concluded that one parcel, GB16 King George / Goodmayes Hospitals could be released from the Green Belt. Additionally four other parcels were recommended for sub-division or for potential partial removal from the Green Belt. These were as follows;
 - GB11 Roding Hospital
 - GB12 Claybury Hospital



- GB13 Hainault Fields
- GB14 Fairlop Plain.
- 1.2.5 The remaining parcels were found to fulfil Green Belt purposes as set out by PPG2 and an interpretation of these purposes at a local level. Table 1.2 below summarises the recommendations of the 2010 report.

Table 1.2, Summary of the 2010 Green Belt Review Results

Parcel	Site fulfilling G purposes an discounted		Full release from the GB
GB01 Wanstead Flats	Х		
GB02 Wanstead Park	Х		
GB03 Snaresbrook	Х		
Crown Court and			
Walthamstow			
GB04 Woodford	Х		
Green			
GB05 Epping Forest	Х		
Hatch and Woodford			
Golf Course			
GB06 Reed's Forest	X		
GB07 Knighton Wood	Х		
GB08 Ray Park	Х		
GB09 Roding Valley Park	Х		
GB10 Roding Lane North Sports Grounds	Х		
GB11 Roding Hospital		X	
GB12 Claybury		X	
Hospital			
GB13 Hainault Fields		Х	
GB14 Fairlop Plain		X	



Parcel	Site fulfilling purposes discounted	GB and	Sub-division and partial release from the GB	Full release from the GB
GB15 Hainault Forest	Х			
GB16 King George / Goodmayes Hospitals				X

- 1.2.6 These recommendations are further illustrated in Appendix 4 of the 2010 London Borough of Redbridge Green Belt review, see Appendix 1 of this report.
- 1.3 Summary of the London of Borough Redbridge Green Belt Review Addendum 2013
- 1.3.1 Public consultation from the 7th January to 22nd February 2013 was undertaken for the Council's Core Strategy Review Preferred Options Report. This document proposed that the sites identified in the 2010 London Borough of Redbridge Green Belt review should be released from the Green Belt.
- 1.3.2 In response to the consultation several developers and landowners made representations to the Council, which suggested further sites could be released from the Green Belt. Some representations challenged the original 2010 Green Belt review and stated that it did not consider smaller sites within the sixteen parcels.
- 1.3.3 Additionally, some representations argued that national policy had moved on from 2010 as PPG2 had been replaced by the NPPF, albeit the NPPF is written in very similar terms and provides the same five Green Belt purposes. The Council believed the findings of the 2010 review were still relevant. However, to ensure all of the representations were fully considered it was decided to conduct a further review of the Green Belt sites put forward in the representations.
- 1.3.4 The findings of this review were set out in the London of Borough Redbridge Green Belt review Addendum 2013. All of these sites were assessed in August 2013 using the same methodology as the 2010 review with the exception that they were assessed against the Green Belt purposes set out within the NPPF.
- 1.3.5 Of the six sites assessed, four were found to meet the Green Belt purposes as set out by the NPPF. The 2013 Addendum review recommended that these sites remain within the Green Belt. Some amendments to site boundaries were put forward where they were found not to follow physical boundaries and/or were the result of minor mapping errors arising from digitising the 2008 Proposals Map. In addition one site



was put forward for full release from the Green Belt as it was assessed as no longer meeting the NPPF purposes. Table 1.3 below shows the conclusions of the 2013 addendum. The recommendations of this review are set out in Appendix 2 of this report.

Table 1.3, Summary of Green Belt Review Addendum (2013)

Site	Site fulfilling GB purposes and discounted	Sub-division and partial release from the GB	Full release from the GB	Boundary Changes
Site A: Land to the south of Roding Hospital	х			
Site B: Fernhall Cottage			X	
Site C: The Nine Acre Site	Х			Х
Site D: Land at Tomswood Hill	X			
Site E: Land to the South of Billet Road, Little Heath	Х			
Site F: Claire House and Repton Court				Х

1.3.6 The 2013 Addendum was completed in August 2013 and referred to the LDF Advisory Panel in September 2013. This provided input into the Preferred Options Extension – Alternative Development Strategies 2014.

Summary of the London Borough Redbridge Green Belt Addendum – Updated February 2015.

1.3.7 The Council received objections to one site set out in the Local Plan Preferred Options Report. The Council therefore set out four options to help meet the Borough's housing



- needs which were subject to a fresh round of public consultation, which took place from the 7th November to 22nd December, 2014.
- 1.3.8 The Council received several representations with regard to potential development sites within the Green Belt some of which had already been considered in the Green Belt Review Addendum (August 2013). However, some of these site boundaries had changed and the Council considered the changes significant enough to warrant reassessment as part of an update to the Green Belt Review Addendum. This update was issued in February 2015.
- 1.3.9 Many of the representations in the 2015 updated Addendum referred to the high pressure for new housing development within the Borough. Housing targets and housing needs had been assessed as part of the Council's Local Plan, taking into account constraints such as the Green Belt. Therefore, the 2015 updated Addendum to the Green Belt review considered the performance of the sites within the Green Belt, put forward in representations, against the five NPPF Green Belt purposes. The 2015 updated assessment again utilised with the methodology of the 2010 Green Belt review and 2013 Green Belt Review Addendum.



2 CONTEXT OF THIS LONDON BOROUGH OF REDBRIDGE DRAFT GREEN BELT REVIEW JANUARY 2016

2.1 Introduction

- 2.1.1 The purpose of this draft review is to evaluate whether the conclusions of the 2010 Green Belt review and the subsequent Addendum of the 2013 and 2015 are still valid and in line with current policy. In addition, this draft review will form part of the Councils evidence base for the Borough's emerging Local Plan.
- 2.1.2 In 2010, Colin Buchanan in association with Wardell Armstrong and Professor Nick Gallent of the University College London were commissioned by the London Borough of Redbridge to undertake a Green Belt review to inform the first revision of the Council's Core Strategy, published in 2008. The main purposes of this 2010 review was to identify areas of Green Belt land which might not fulfil national planning policy. In 2010 the relevant policy was PPG2 however, this was superseded by the NPPF in March 2012.
- 2.1.3 A desk and site study was undertaken in August and September 2015 and this assessed whether the findings with regard the sixteen sites identified in the 2010 review were still in line with national policy. In addition it examined the sites examined as part of the 2013 and 2015 Green Belt review Addendums. The purpose of the study was to identify if land should remain within or be released from the Green Belt.

2.2 **Methodology**

- 2.2.1 For consistency this 2016 draft review has utilised the Stage 3B methodology as that of the 2010 review (see Appendix 1, section 2.5 for the methodology). This has been updated to take account of the Green Belt purposes set out within the NPPF.
- 2.2.2 In addition, the 2010 review utilised a scoring system which assessed each identified Green Belt parcel against PPG2 (national policy) purposes and local interpretations of these purposes. However a scoring system such as this may be considered to be too crude to fully capture the inter-relationship between performance against all of the purposes and local interpretations. Accordingly this draft review has assessed the contribution that each parcel makes to the Green Belt as a written evaluation only.
- 2.2.3 Site inspections provided a detailed assessment of the sixteen parcels of Green Belt land to complement the desk-study. The site inspections enhanced the analysis of the NPPF, particularly in relation to understanding and assessing sprawl; merging of



settlements; countryside encroachment; and setting and character of Conservation Areas. This also addressed key landscape characteristics, namely;

- Landscape and vegetation structure, taking account of landscape structure; adjacent development; the possibility of settlement coalescence and the determination of vegetation cover.
- Topography, which is important when considering the wider openness of the Green Belt and any impact on key views.
- Biodiversity, considering any key designations or conservation status of the sites.
- 2.2.4 The findings of the desk-based study and site inspections and have informed the assessments made by this report.

2.3 Redbridge Green Belt role and purposes

- 2.3.1 The 2010 London Borough of Redbridge Green Belt review was undertaken in the context of PPG2 which was superseded by the NPPF in March 2012. The NPPF was part of UK government reforms that aimed to make the UK planning system less complex and more accessible. It simplified a number of policy pages about planning and acts as guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications.
- 2.3.2 The NPPF outlines twelve core principles of the planning system, one of particular relevance to Green Belt is to:
 - "take account of the different roles and character of different areas, promoting
 the vitality of our main urban areas, protecting the Green Belts around them,
 recognising the intrinsic character and beauty of the countryside and
 supporting thriving rural communities within it."

(NPPF, para 17.)

2.3.3 The NPPF notes that the Government attaches great importance to Green Belts. The 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."

(NPPF, para 79.)

- 2.3.4 The NPPF sets out five purposes of the Green Belt, namely;
 - "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."

(NPPF, para 80.)

- 2.3.5 The wording of the five NPPF purposes is identical to that of PPG2 which formed the basis of the 2010 assessment. As a consequence the national interpretation of these purposes presented by the 2010 Green Belt review are still valid and there is no need to re-examine the national purposes in this 2015 addendum. However, there is the need to re-examine the local interpretation of these purposes in the context with the NPPF.
- 2.3.6 In addition to the five Green Belt purposes there are four core principles set out within the NPPF that are of relevance, particularly when addressing local issues and characteristics within the Borough and the way in which the above Green Belt purposes can be interpreted at a local level;
 - "...Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
 - Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
 - Promote mixed use developments, and encourage multiple benefits from the
 use of land in urban and rural areas, recognising that some open land can
 perform many functions (such as for wildlife, recreation, flood risk mitigation,
 carbon storage, or food production);
 - Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;..."

(NPPF, para 17.)

2.3.7 These help take account of local issues and characteristics when applying the NPPF to Green Belt land within the Borough.



- 2.3.8 The NPPF states that once Green Belt land has been defined, local planning authorities should plan to enhance the beneficial uses of Green Belt, which include;
 - Providing opportunities for access, outdoor sport and recreation;
 - Retain and enhance landscapes and visual amenity;
 - Protect biodiversity; and
 - Improve damaged and derelict land.
- 2.3.9 In that regard Green Belt land has additional purposes to that of the aforementioned purposes set out in paragraph 80 of the NPPF. These are set out elsewhere within the NPPF and aid the interpretation of the NPPF at the local level.
- 2.3.10 The NPPF attaches great weight to locally important green open spaces. Paragraph 77 states;

"The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land."

(NPPF, para 77.)

2.3.11 In addition, paragraph 78 states that;

"Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts."

(NPPF, para 78.)

2.3.12 When determining Green Belt boundaries the NPPF makes clear that boundaries should be permanent and defendable beyond the duration of the Local Plan. Paragraph 83 states that once established;



"Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

(NPPF, para 83.)

2.3.13 Paragraph 84 also addresses Green Belt boundaries and states that;

"When drawing up or reviewing Green Belt boundaries local planning authorities 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 inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

(NPPF, para 84.)

- 2.3.14 Paragraph 85 sets out six objectives that planning authorities should consider when defining boundaries, which are;
 - "Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
 - Not include land which it is unnecessary to keep permanently open;
 - Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
 - Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
 - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

(NPPF, para 85.)

2.3.15 In that regard local planning authorities should be certain that Green Belt boundaries are well defined by permanent physical features which will be relevant beyond the



Local Plan period. Areas that are deemed necessary to remain open should be retained within the Green Belt.

- 2.3.16 In light of the above additional requirements of the Green Belt set out by the NPPF, the following local interpretations can be made.
- 2.3.17 The 2010 Green Belt review locally interpreted the national Green Belt purpose; "to check the unrestricted sprawl of large built up areas", as;

"the Green Belt should check sprawl into locally important open space."

(Page 7, 2010 Green Belt review.)

- 2.3.18 This is consistent with the NPPF. Any land in adjoining local authorities will need to be considered when establishing the role played by the Green Belt. Where parts of the Green Belt are surrounded by urban development or have already been encroached onto by development, these areas are considered to not prevent sprawl. However, Green Belt may check sprawl between local pockets of urban development, or it may check urban sprawl into locally important open space. Such areas may therefore be important in achieving a local level interpretation of this Green Belt purpose.
- 2.3.19 The 2010 Green Belt review locally interpreted the national Green Belt purpose; "to prevent neighbouring towns from merging into one another", as;

"Green Belt should prevent merging and coalescence of local centres (within the existing conurbation)."

(Page 7, 2010 Green Belt review.)

- 2.3.20 This is again consistent with the NPPF. Redbridge contains a number of larger local centres which whilst not comprising separate towns they are distinct areas within the greater London area. Whilst the Green Belt within Redbridge does not prevent the merging of neighbouring towns at a national level i.e. "to prevent neighbouring towns merging into one another", at a local level the Green Belt prevents the merging of these local centres within the greater London urban area.
- 2.3.21 The 2010 Green Belt review locally interpreted the national Green Belt purpose; "to assist in safeguarding the countryside from encroachment", as;

"Green Belt should safeguard locally important open space."

(Page 8, 2010 Green Belt review.)



- 2.3.22 This is also consistent with paragraph 78 of the NPPF that requires the management of development within a Local Green Space to be consistent with Green Belt policy. Redbridge is generally urbanised and comprises high density development, which is typical of the wider London conurbation. "Countryside" is often constrained to small areas of locally important open land. In that regard "safeguarding the countryside from encroachment" also needs to be considered in relation to land uses in adjoining local authority areas. Accordingly at a local level the Green Belt should safeguard locally important open space.
- 2.3.23 The 2010 Green Belt review locally interpreted the national Green Belt purpose; "to preserve the setting and special character of historic towns", as;

"Green Belt should preserve the setting and character of conservation areas."

(Page 8, 2010 Green Belt review.)

- 2.3.24 This is again consistent with the NPPF. Redbridge contains a number of local centres that make up the wider London conurbation but these cannot be considered separate towns and the Borough does not contain any historic towns. Therefore, the Green Belt purpose "to preserve the setting and special character of historic towns" has limited relevance to Redbridge. However, the Borough has a number of conservation areas which contribute to the setting and special character of the area. A local interpretation of this Green Belt purpose is that the Green Belt should preserve the setting and character of those conservation areas as set out in paragraph 77 and 78 of the NPPF.
- 2.3.25 The 2010 Green Belt review concluded that the national Green Belt purpose; "to assist in urban regeneration by encouraging the recycling of derelict and other urban land" was irrelevant to Redbridge as;

"Green Belt contributes equally to fulfilling this purpose. Each parcel, by its nature and designation, encourages development within the urban area."

(Page 8, 2010 Green Belt review.)

2.3.26 The Council has considered all non-Green Belt previously developed land as part of their Strategic Housing Land Availability Assessment. Also almost all of new development is built on previously developed land. Therefore the release of Green Belt land would not undermine any attempt "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land". As a consequence this national purpose has no local relevance to Redbridge and is not considered further within this review.



2.3.27 The following sections 3, 4 and 5 provide an introduction to the 2010 Green Belt review; the 2013 Green Belt Review Addendum; and the 2015 Green Belt Review Addendum Update and tests whether there conclusions are still valid and in line with current policy.



3 REVIEW OF THE 2010 GREEN BELT REVIEW

3.1 Introduction

- 3.1.1 The original Green Belt review was completed in 2010 by Colin Buchannan in association with Wardell Armstrong and University College London and was prepared to inform the Council's first revision of the Core Strategy which was adopted in 2008.
- 3.1.2 The main objective of the review was to identify land in the Green Belt which no longer fulfilled the objectives of national policy for Green Belt, as set out within PPG2 at the time.
- 3.1.3 The Council divided the Green Belt into sixteen parcels and set out details of the history of these parcels, development pressures and policy constraints. This provided consultants with information relating to each parcel including land area; ownership; use at the time; planning history; and other significant constraints. The sixteen parcels that were identified are as follows:
 - GB01: Wanstead Flats
 - GB02: Wanstead Park
 - GB03: Snaresbrook Crown Court and Walthamstow
 - GB04: Woodford Green
 - GB05: Epping Forest Hatch and Woodford Golf Course
 - GB06: Reed's Forest
 - GB07: Knighton Wood
 - GB08: Ray Park
 - GB09: Roding Valley Park
 - GB10: Roding Lane North
 - GB11: Roding Hospital
 - GB12: Claybury Hospital
 - GB13: Hainault Fields
 - GB14: Fairlop Plain
 - GB15: Hainault Forest
 - GB16: King George / Goodmayes Hospital



3.1.4 The full results of the 2010 London Borough of Redbridge Green Belt review desk-based and site-based surveys are set out in section 5 of the 2010 review, attached as of Appendix 1 of this 2016 draft review. The following provides an update to those results following a site survey conducted in September 2015.

3.2 **GB01: Wanstead Flats**

- 3.2.1 This parcel comprises a large expanse of flat land which is referred to as Wanstead Flats. The majority of the parcel is bound with trees with extensive woodland to the north. The parcel contains Site of Special Scientific Interest (SSSI) and Site of Nature Conversation Importance (SNCI) designations, ancient and semi-natural woodland and a network of ponds. These contribute to the wider Green Belt and the visual and biodiversity importance of the parcel. The parcel contributes to the setting of the adjacent Conservation Areas of Aldersbrook and Wanstead Park and prevents coalescence between them. The parcel also provides a link to GB02 Wanstead Park and the Green Belt to the south east and north west in the adjoining local authority areas.
- 3.2.2 GB01 represents locally important open space that has the purpose of providing opportunity for access and recreational space and protects the biodiversity of the area. With the exception of where it links to other Green Belt parcels it has strong physical boundaries provided by roads at its borders and a generally well-defined urban edge. It does not check urban sprawl as it is generally surrounded by urban development. However, it provides a break between Aldersbrook to the north and Manor Park to the south and prevents the merging of these local centres. The parcel is located adjacent to the Wanstead Park Conservation Area and it contributes to the setting and character of the Conservation Area, particularly where the parcel adjoins the Conservation Area's southern boundary along Aldersbrook Road.
- 3.2.3 The findings of the 2010 review remain valid. It is recommended that the parcel remains in the Green Belt and that it is not sub-divided.

3.3 GB02: Wanstead Park

3.3.1 This parcel mainly comprises undulating topography, sloping eastwards towards the Roding Valley. Woodland is fragmented and there are denser areas of woodland located eastwards towards the river valley. The parcel has a strong sense of enclosure. GB02 links with GB01 to the west and provides the setting for the Conservation Areas of Aldersbrook and Wanstead Park. The river valley to the east of parcel forms a part of the Blue Ribbon network and also provides a well-defined link to GB09 and the



- wider Green Belt beyond. It links to the Green Belt beyond the Borough boundary to the south and forms part of a contiguous corridor of Green Belt.
- 3.3.2 GB02 represents locally important open space that has the purpose of providing opportunity for access and recreational space and protects the biodiversity of the area. It also has strong physical boundaries provided by roads at its borders. It does not check urban sprawl as the majority of the parcel is surrounded by urban development however, it provides a break between Aldersbrook to the south and Wanstead to the north and prevents the merging of these local centres. In addition a large proportion of the parcel is located within the Wanstead Park Conservation area, as a consequence the parcel helps preserve its setting and character.
- 3.3.3 The findings of the 2010 review remain valid. It is recommended that the parcel remains in the Green Belt and that it is not sub-divided.

3.4 GB03: Snaresbrook Crown Court and Walthamstow Forest

- 3.4.1 The majority of this parcel is flat. The northern section is mostly wooded and a river tributary flows through the centre. The southern section bounds Snaresbrook Crown Court, which is enclosed by woodland which contributes to a strong sense of enclosure. Visual linkage between the northern and southern sections is limited due to the boundary provided by Snaresbrook Road and the Borough boundary. Additionally, there are no linkages with the other Green Belt parcels within the Borough. However, this is because the northern and southern sections are contiguous with the wider Green Belt within the adjoining local authority area of Waltham Forest.
- 3.4.2 GB03 does not prevent urban sprawl as it forms part of the eastern boundary of the wider Green Belt which is surrounded by urban development. However it does provide a break between Snaresbrook and Upper Walthamstow. It also represents locally important open space and safeguards the countryside from encroachment as it provides links to the wider Green Belt along its western border. In addition, it retains the character and setting of the Snaresbrook Conservation Area to the south.
- 3.4.3 It is recommended that the parcel remain in the Green Belt and that it is not subdivided.
- 3.4.4 However it is recommended that the boundary of the Green Belt be realigned. The Primary Constraints map contained in the 2010 Green Belt review (Appendix 1, section 5.3) shows that the Green Belt boundary is not consistent with the Borough boundary. In addition, the Green Belt at the north eastern tip of the northern section of GB03, is



not defined by a clear, permanent physical boundary. Part of the northern section of GB03 extends into a school playing field which is bounded by grey palisade fencing, see images 1 and 2 in Appendix 4. Similarly, a SSSI is shown by the Primary Constraints map to be within the same boundary. This is most likely to be as a result of a mapping error. It is recommended that the boundary be amended to follow the line of the grey palisade fencing which delineates the school's playing field as this will provide a permanent physical boundary.

3.5 **GB04: Woodford Green**

- 3.5.1 The parcel is generally flat and its boundaries are formed by roads and development. The parcel is split into two distinct sections, north and south, both are linked by a corridor of land to the east of the parcel. However, the southern parcel has a strong physical and visual link with Epping Forest to the south west. In addition the southern half of the parcel is designated a SSSI and a SNCI which both link with Epping Forest. The northern section is more weakly linked to the Green Belt and Epping Forest to the west. The 2010 Green Belt review (see Appendix 1) had recommended a further addition to the Green Belt to strengthen this linkage.
- 3.5.2 This parcel does not prevent sprawl nor does it prevent the merging of towns in the Borough or within the adjoining local authority area (Waltham Forest). It is predominately surrounded by urban development, however, the southern part is connected to the wider Green Belt. The parcel represents locally important open space, the southern part of Woodford Green strengthens this aspect of the northern part through the corridor of land in the middle of the parcel. The parcel maintains a gap between the local centres of Chingford to the west and Woodford to the east and helps to preserve the setting and character of the Woodford Conservation Area.
- 3.5.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided. The original 2010 review suggested including an additional small area of open land to the west of the northern section within the Green Belt (see Appendix 1, section 5.4, Sub-division GB04). The site assessment in September 2015 confirmed that this would be appropriate as this small area enhances the link to the west between the northern section of GB04; the wider Green Belt of GB05; and Green Belt within the adjoining local authority area (Waltham Forest) as well as Epping Forest to the west.



3.6 **GB05:** Epping Forest Hatch and Woodford Golf Course

- 3.6.1 GB05 is a larger parcel, it undulates and slopes towards the west. The parcel borders Epping Forest and contains some patches of dense woodland, with intermittent grasslands. For a small section along Whitehall Road, the parcel is visually and physically connected to GB06 by a contiguous area of dense woodland. A considerable section of the parcel is within an SSSI and there is ancient and semi-natural woodland present where the parcel borders GB06 to the east and the river valley adjacent to the parcel's western border. These features contribute to the biodiversity of the area.
- 3.6.2 This parcel is well connected to the wider Green Belt outside Redbridge to the west and north. It does not prevent sprawl as the wider Green Belt is surrounded by urban development, nor does it prevent the merging of neighbouring towns. However, GB05 to the west and north maintains a gap between Chingford to the west and Woodford to the east and prevents coalescence to these local centres. In addition GB05 safeguards the countryside from encroachment and is connected to the wider Green Belt to the west and to the north. GB05 also helps preserve the setting of Woodford Green Conservation Area, which is adjacent to its southern and western border.
- 3.6.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.7 **GB06: Reed's Forest**

- 3.7.1 GB06 is made up entirely of an area of woodland that borders GB05 to the west. The parcel undulates and slopes to the east. The parcel consists of densely wooded areas of ancient and semi-natural woodland and is designated as a SSSI and Special Area of Conservation (SAC). It is also locally designated as a SNCI. It is therefore very important to the biodiversity of the area. Woodford Wells Conservation Area is present within the eastern part of GB06. The parcel is intersected by Epping New Road, but maintains strong visual and physical links between its western and eastern parts. There is also a strong visual and physical connection to GB05 to the west.
- 3.7.2 Reed's Forest does not prevent sprawl nor does it prevent the merging of neighbouring towns as it is surrounded by urban development, it is essentially an extension to GB05. Despite the presence of intersecting roads, the parcel has strong physical and visual links to GB05 and thereby links to the wider Green Belt and assists in safeguarding the countryside from encroachment. In addition it helps preserve the character and setting of the Woodford Wells Conservation Area.



3.7.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.8 **GB07: Knighton Wood**

- 3.8.1 GB07 predominately comprises dense woodland, with ancient and semi-natural woodland, it undulates and slopes to the south and the parcel is designated both a SSSI and a SAC. The parcel is connected to the wider Green Belt to the north west as it is part of Buckhurst Hill (within the Epping Forest District).
- 3.8.2 Knighton Wood does not prevent sprawl nor does it prevent the merging of neighbouring towns. It represents the southwest corner of Buckhurst Hill, which is located outside of Redbridge and is as a whole surrounded by urban development. GB07 safeguards the countryside from encroachment, as it forms part of Buckhurst Hill, to which it is clearly connected. Buckhurst Hill represents urban countryside in need of protecting. The parcel represents locally important open space, this importance is supported by its connection to the wider area of Buckhurst Hill.
- 3.8.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.9 **GB08: Ray Park**

- 3.9.1 GB08 slopes down from the east to the west. The parcel is surrounded by urban development to the east and south west. The northern boundary of the site adjoins the Borough's edge, at this point the parcel is connected to the wider Green Belt within the Epping Forest District. To the south the parcel is connected to GB09 through a narrow section of land that follows the river corridor of the Roding Valley and at this point a section of the Woodford Bridge Conservation Area extends across the parcel. This section creates a corridor that extends southwards, linking to other parcels within the Borough.
- 3.9.2 The parcel does prevent sprawl, it separates Woodford Bridge to the east and Woodford Green to the west. The parcel is open, is of significant size and the land represents locally important open space. GB08 is contiguous with the wider Green Belt, in this regard it safeguards the countryside from encroachment. The southern boundary with GB09 is strategically important as it creates a corridor with the Borough's other parcels of Green Belt. To the north the parcel links to the wider Metropolitan Green Belt beyond the Borough boundary. The parcel has some effect in preserving the setting and character of the Woodford Bridge Conservation Area.



3.9.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.10 GB09: Roding Valley Park

- 3.10.1 Most of GB09 is located within the river flood plain of the Roding Valley. The majority of GB09 is classed as a SNCI and therefore the biodiversity value is high. This is reinforced by the strong physical linkage to GB08; GB10; GB02; and this with other parcels within and beyond the Borough boundary. The parcel is situated adjacent to the Wanstead Grove Conservation Area to the south west and the Woodford Bridge Conservation Area to the north. Development potential within and at the edge of this parcel is limited due to the presence of the river flood plain. The parcel is generally well defined by roads at its boundaries.
- 3.10.2 GB09 does not prevent sprawl as it is surrounded by urban development to the east and west, additionally the North Circular and the Blue Ribbon create further barriers to development. However, the parcel prevents the merging of local centres within the London conurbation. The parcel does represent locally important open space and safeguards the countryside from encroachment, strengthened by its connections to other Green Belt parcels and its connection to the wider Green Belt. This connection also reinforces its importance in protecting biodiversity. The parcel has some effect in preserving the setting of the Wanstead Grove Conservation Area and the Woodford Bridge Conservation Area.
- 3.10.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.11 GB10: Roding Lane North

3.11.1 GB10 is shallowly sloping and borders the Roding Valley flood plain to the west. Seminatural woodland on this western boundary is located within a SNCI. Ponds and ditches within the site provide further biodiversity value. The parcel is physically and visually linked with GB09 to the west. To the north, south and east there is a well-defined settlement edge, which is less defined to the north east where it links with GB12. The link with GB12 is somewhat weakened by the presence of new housing development to the east of Roding Lane North. However, the presence of mature vegetation and mature trees within this section preserves a visual link. Image 3 in appendix 4, is taken from the south west corner of GB12 looking into the north eastern edge of GB10, it demonstrates the visual link between these parcels.



- 3.11.2 GB10 does not prevent sprawl. However, it does prevent the merging of local centres namely, Woodford to the west, Redbridge to the east and Chigwell to the north. It prevents the visual coalescence of Woodford to the north west and the wider area of Ilford to the south east. GB10 helps safeguard the countryside from encroachment given its connection with Green Belt parcels GB09 and GB12. It also represents locally important open space for recreation and has a high biodiversity value. The area also helps to preserve the setting of the Woodford Bridge Conservation Area to the south east.
- 3.11.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.12 **GB11: Roding Hospital**

- 3.12.1 The 2010 Green Belt review recommended that a significant portion of this parcel be released from the Green Belt. The area surrounding Roding Hospital and Hatton School is relatively developed, as a result it was recommended for release (see Appendix 1, page 97). The site labelled as GB11b on drawing ST14935-004 is generally developed. The area associated with the Spire Roding Hospital; electrical substation; and Hatton School and Special Needs Centre to the west of the parcel do not meet any national Green Belt purposes or local interpretations, nor do the areas associated with Beal High School and development located along Woodford Bridge Road to the east.
- 3.12.2 During the Council's Green Belt review, 2013 Addendum, a part of the parcel to the east of Roding Lane South (including Fernhall Cottage) was recommended for further release (see Appendix 2, page 21), refer to section 4.3 below of this 2016 report. The September 2015 site visit found that this previous recommendation is valid. This part of the parcel is labelled GB11c on drawing ST14935-004 and relates strongly to urban and residential development to the east. As a consequence it does not meet any national Green Belt purposes and local interpretations. The comments below refer to the remaining area of land which adjoins GB09.
- 3.12.3 The remaining area of land within the parcel mostly comprises dense semi-natural woodland, it opens out to the west where the river valley (Roding Valley) extends north south. This area has a well-defined edge to the east were it borders Roding Lane South. The site has a strong sense of enclosure due to the presence of dense woodland. To the west it is visually connected to GB09 through a wide pedestrian underpass that extends beneath the North Circular (see image 4 in Appendix 4).



- Furthermore, it is physically and visually connected to GB09 when looking north and south along the river valley, see image 5 in Appendix 4.
- 3.12.4 GB11 does not prevent sprawl nor does it prevent the merging of local centres or neighbourhoods. The North Circular and the river valley act as physical barriers between Clayhall and Snaresbrook. However, the parcel protects the countryside from encroachment due to the parcel's strong physical and visual link with GB09. This effect extends to the wider Green Belt as GB09 is connected to the wider Borough and Metropolitan Green Belt.
- 3.12.5 It is recommended that the parcel is sub-divided as recommended by the 2010 Green Belt review and the 2013 Addendum review (see drawing ST14935-004). However, it is recommended that the remaining area of GB11 be considered part of GB09 considering its small size and its strong physical and visual linkage with GB09 and the wider Green Belt (see drawing ST14935-005).

3.13 **GB12: Claybury Hospital**

- 3.13.1 The 2010 Green Belt review suggested that two areas of the parcel be released from the Green Belt, see Appendix 1, page 106. These two areas are labelled as GB12b and GB12c on drawing ST14935-004. This draft review has concurred with that assessment as these areas do not fulfil Green Belt purposes.
- 3.13.2 The area relating to GB12b comprises the former Claybury Hospital, now a residential community known as Repton Park. The area does not check urban sprawl nor does it prevent sprawl into locally important open space as it is surrounded by urban development, to the north and east. GB12b does not prevent neighbouring towns from merging as surrounding development is part of Ilford. It is physically connected to GB12 and views are available of this area from within Claybury Park, however it does not safeguard the countryside from encroachment. The area relating to GB12b is not located within or adjacent to a historic town, however it is located within the Claybury Conservation Area and contributes to the character of the Conservation Area.
- 3.13.3 The area relating to GB12c comprises residential development. This area does not meet any national Green Belt purposes or local interpretations.
- 3.13.4 It is recommended that the findings of the 2010 review be carried forward and these areas are released from the Green Belt. The comments below refer to the remaining area of land within GB12.



- 3.13.5 GB12 is undulating and slopes down towards the south. There is extensive woodland separated by areas of parkland and grassland. The parcel is bounded by fencing and mature trees which often creates a strong sense of enclosure. The majority of the parcel is a SNCI, all of the parcel (with the exception of a small area to the south east) is designated as a green corridor and most of the site is part of the Claybury Conservation Area. A large proportion of the parcel is contained within Claybury Park which has long range views of the wider London conurbation and the Metropolitan Green Belt.
- 3.13.6 GB12 does not prevent sprawl nor does it prevent the merging of towns. It is surrounded by urban development. The parcel does, however, prevent coalescence of Clay Hall and Woodford Bridge and helps maintain the gap between Woodford/Woodford Green to the east and the various neighbourhoods to the north of Ilford. The parcel represents locally important open space especially where this corresponds to Claybury Park. The parcel safeguards the countryside from encroachment as it is connected to GB10 and thus the wider Green Belt.
- 3.13.7 It is recommended that with the exception of the two areas previously referred to as GB12b and GB12c (see drawing ST14935-004) the majority of the parcel remain in the Green Belt and that it is not sub-divided further. However, a minor amendment to the southern boundary is recommended; referred to as GB12d, where part of the parcel has been built upon, north of development off Repton Grove. It is recommended that the Green Belt boundary at this point be amended to follow the boundary of Claybury Park (see drawing ST14935-004).

3.14 **GB13: Hainault Fields**

- 3.14.1 The 2010 Green Belt review suggested that a part of the parcel be released from the Green Belt, see Appendix 1, page 115. This was recommended as a railway line intersects the parcel from north to south. It was recommended that the western part of the parcel be released as the railway line creates a strong physical boundary for the western part of the parcel. This area is labelled GB13b on drawing ST14935-004.
- 3.14.2 The September 2015 assessment reaffirmed the findings of the 2010 review. GB13b (referred to as Oakfields in the Redbridge Local Plan 2015-2030 Preferred Options Report Extension: Alternative Development Strategies report) represents locally important open space. However, it does not meet any other NPPF purposes. The site does not check unrestricted sprawl of large built-up areas as it is surrounded by development to the north, west and south nor does it prevent neighbouring towns



merging into one another as adjacent development is part of Ilford and the greater London conurbation. In addition the site's openness and connection to the wider Green Belt is limited by the presence of the railway to the east. Also the site does not preserve the setting and special character of historic towns nor does it preserve the setting of Conservation Areas as the site is not adjacent to or designated as a Conservation Area. The remainder of the text below considers the remaining area to the east of the railway line.

- 3.14.3 GB13 is physically split into two parts by small industrial estate located along Roebuck Road. The largest section of GB13 is located west of Roebuck Road and is flat and open. Hedgerows and trees extend along field boundaries and extend at right angles to Forest Road. To the east of Roebuck Road there is a smaller section of GB13 which comprises the Forest Park Cemetery & Crematorium. This comprises grassland on more sloping topography and is visually connected to both GB13 and to GB15. In addition it has long range views of the wider London Conurbation and the Metropolitan Green Belt. Parts of the parcel are located within a SNCI and all of the parcel, apart from the Cemetery is located within an Archaeological Priority Zone (APZ).
- 3.14.4 The parcel does prevent sprawl as it is part of the largest area of Green Belt in the Borough of Redbridge comprising Green Belt parcels GB13, GB14 and GB15. It is bordered by urban development to the west and north. GB13 is thus considered to prevent sprawl. It prevents the merging of local centres as it separates Hainault to the north from Chadwell Heath and Newbury Park to the south. It forms a gap between Redbridge, as part of Greater London conurbation, and towns beyond the Borough boundary. It is contiguous with the wider Green Belt and in that regard, it safeguards the countryside from encroachment. It also represents locally important open space for recreation and other uses associated with the cemetery.
- 3.14.5 The findings of the 2010 Green Belt review remain valid. It is recommended that with the exception of the area labelled as GB13b, the parcel remain in the Green Belt and that it is not sub-divided further (see drawing ST14935-004). However, it is recommended that the far eastern part comprising of Redbridge Cemetery is reclassified as GB13a (see drawing ST14935-005), in order to clarify its visual connection with the western portion of GB13.



3.15 **GB14: Fairlop Plain**

- 3.15.1 The 2010 Green Belt review suggested that a part of the parcel be released from the Green Belt, see Appendix 1, page 128. This was recommended as a railway line intersects the parcel from north to south. It was recommended that the north western part of the parcel be released as the railway line creates a strong physical boundary for the western part of the parcel. This area is labelled GB14b on drawing ST14935-004.
- 3.15.2 The September 2015 site assessment reaffirmed the findings of the 2010 review. The area labelled GB14b represents locally important open space due to the presence of the playing fields to the south of Fullwell Cross and King Solomon High School, however, it does not meet any of the NPPF purposes. The site does not check urban sprawl of large built-up areas as it is mostly surrounded by urban development, particularly to the north, west and south. This area does not prevent the merging of neighbouring towns nor does it prevent the merging and coalescence of local centres as it is surrounding urban development is part of Ilford and the local centres of Barkingside and Fullwell Cross have existing coalescence. The site is physically and visually disconnected to the remainder of GB14 due to the presence of the railway and railway embankment to the east of the site, in that regard the site does not safeguard the countryside from encroachment. In addition the area is not located within or adjacent to a historic town or Conservation Area, therefore the site does not preserve the setting and special character of historic towns or Conservation Areas. As a consequence, although the site meets one local interpretation of Green Belt purposes the site labelled GB14b (see drawing ST14935-004) does not meet any other national Green Belt purpose or any other local interpretations. Therefore it is recommended that the recommendation put forward by the 2010 review to release the site from the Green Belt be carried forward.
- 3.15.3 GB14 is a large, open and generally flat parcel of land with some wooded areas to the north of the parcel which surround Fairlop Waters. Field boundaries within the parcel comprise hedgerows and mature trees.
- 3.15.4 The parcel does prevent sprawl. It is the single largest green belt parcel in Redbridge and is connected to GB13 and GB15 which link to the wider Green Belt. Urban development borders the west and south of the site and in this regard it can be considered to prevent sprawl. GB14 is generally open with some intervening vegetation along field boundaries and it forms part of the continuous Green Belt that



- surrounds London. In that regard it safeguards the countryside from encroachment. It also forms a barrier between the local centres of Hainault to the north from Chadwell Heath and Newbury Park to the south, preventing them from merging. In addition the western part of the parcel represents locally important open space.
- 3.15.5 It is recommended that the area labelled as GB14b (see drawing ST14935-004) is released from the Green Belt. The potential for further sub-division of the remainder of the parcel is discussed further in sections 4 and 5 of this 2016 review.

3.16 **GB15: Hainault Forest**

- 3.16.1 GB15 can be split into two distinct parts. The northern part comprises undulating land and densely wooded areas including Hainault Forest Country Park and Hainault Forest Golf Course. The wooded area is designated a SSSI and a SNCI consisting of ancient, semi-natural woodland. The southern part comprises small to medium sized arable fields with areas of grassland and scrub land. The middle section of the parcel is being developed for housing, along Five Oaks Lane. The parcel as a whole is visually and physically connected with parcels GB14 and GB13 and the wider Green Belt.
- 3.16.2 GB15 Hainault Forest prevents sprawl and prevents the merging of local centres. The parcel is open and is well connected with the wider Metropolitan Green Belt, in this regard it safeguards the countryside from encroachment. It prevents Havering Park (London Borough of Havering) and Hainault from merging. GB15 also represents locally important open space and the ancient woodland and the diversity of landscapes increase the biodiversity value of the parcel.
- 3.16.3 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel remain in the Green Belt and that it is not sub-divided.

3.17 **GB16: King George / Goodmayes Hospitals**

- 3.17.1 The 2010 Green Belt review recommended that GB16 be removed from the Green Belt as the parcel was considered to have an urban character and be isolated from the wider Green Belt, see Appendix 1 page 144 152. The September 2015 site assessment reviewed the findings of the 2010 review.
- 3.17.2 GB16 is generally flat and slopes downwards towards the southern boundary of a tree lined playing field. The parcel can be split into two distinct parts, the hospital site to the east and Seven Kings Park and Fords Sports Ground to west. These areas are dissected by a tree lined river extending north to south. The parcel is physically and visually unconnected to the wider Green Belt parcel of GB14 due to the presence of



- the A12 dual carriageway. The site is surrounded by housing on all sides and the hospital site is relatively urbanised. A large part of the parcel is designated a SNCI.
- 3.17.3 GB16 does not prevent sprawl nor does it prevent the merging of local centres as it is surrounded by development at all sides. Furthermore, its physical and visual connection to GB14 and the wider Green Belt is weak due to the presence of the A12 and the urbanised nature of the hospital site. In that regard it does not safeguard the countryside from encroachment. The western and southern parts of the parcel can be considered locally important open space, particularly Fords Sports Ground; Goodmayes Hospital Sports Ground; Seven Kings Park; and Barley Lane Allotments. These spaces also help to retain the biodiversity of the area. The hospital site is urbanised in character and does not meet any Green Belt purpose. However it should be noted that, if the hospital site was released the remainder of the Green Belt land to the west would be isolated from GB14 and therefore any recommendations must be inclusive of the site as a whole.
- 3.17.4 The findings of the 2010 Green Belt review remain valid. It is recommended that the parcel be released from the Green Belt (see drawing ST14935-004 and 005).
- 3.18 Summary: Consistency between the recommendations of the 2010 Green Belt Review and this draft review.
- 3.18.1 Table 3.1 below summarises the recommendations of the 2010 Green Belt review and this draft review.

Table 3.1, Summary of the 2010 Green Belt Review and This Draft Reviews Findings

Parcel	Recommendation of the 2010 Green Belt Review	Recommendations of this draft review
GB01: Wanstead Flats	Total release from Green Belt: NO Potential for sub-division: NO	No change.
GB02: Wanstead Park	Total release from Green Belt: NO Potential for sub-division: NO	No change.
GB03: Snaresbrook Crown Court and Walthamstow	Total release from Green Belt: NO Potential for sub-division: NO	No change.



Parcel		
raicei	Recommendation of the 2010 Green Belt Review	Recommendations of this draft review
GB04: Woodford Green	Total release from Green Belt:	No change.
	Potential for sub-division: NO	
	Potential for further Green Belt allocation: YES	
GB05: Epping Forest Hatch and Woodford Golf Course	Total release from Green Belt:	No change.
	Potential for sub-division: NO	
GB06: Reed's Forest	Total release from Green Belt: NO	No change.
	Potential for sub-division: NO	
GB07: Knighton Wood	Total release from Green Belt: NO	No change.
	Potential for sub-division: NO	
GB08: Ray Park	Total release from Green Belt: NO	No change.
	Potential for sub-division: NO	
GB09: Roding Valley Park	Total release from Green Belt:	No change.
	Potential for sub-division: NO	
GB10: Roding Lane North Sports Grounds	Total release from Green Belt:	No change.
	Potential for sub-division: NO	
GB11: Roding Hospital	Total release from Green Belt:	No change.
	Potential for sub-division: YES	Further sub-division has been recommended (see section 3.3 below). Furthermore, it is recommended that the



Parcel	Recommendation of the 2010 Green Belt Review	Recommendations of this draft review remaining area become part of
		GB09.
GB12: Claybury Hospital	Total release from Green Belt:	No change.
	Potential for sub-division: YES	However, it is recommended that the Green Belt boundary to the south of the parcel (north of Repton Grove) be realigned with the boundary of Claybury Park.
GB13: Hainault Fields	Total release from Green Belt:	No change.
	Potential for sub-division: YES	However, there is the potential for re-categorisation of the most eastern part of the parcel (comprised Redbridge cemetery) as GB13A.
GB14: Fairlop Plain	Total release from Green Belt:	No change.
	Potential for sub-division: YES	Potential for further sub- division of part of this parcel is discussed further in sections 4 and 5 of this 2016 review.
GB15: Hainault Forest	Total release from Green Belt: NO Potential for sub-division: NO	No change.
GB16: King George / Goodmayes Hospitals	Total release from Green Belt: YES Potential for sub-division: YES	No change.



4 REVIEW OF GREEN BELT ADDENDUM 2013

4.1 Introduction

- 4.1.1 From the 7th January 2013 to the 22nd February the Council conducted public consultation on its Core Strategy Preferred Options Report. The Preferred Options Report contributed towards the drafting of the Pre Submission document, the Preferred Options Report proposed that the recommendations of the 2010 Green Belt review be followed and the sites identified for release were released.
- 4.1.2 In response to consultations the Council received representations on behalf of developers and land owners suggesting further sites for release. This 2016 draft review has considered the findings of these representations during the review process.
- 4.1.3 The sites suggested formed part of the larger GB parcels identified within the 2010 Green Belt review. Six sites were suggested and of these four were found to be continuing Green Belt purposes, one was recommended for release and boundary changes were also suggested (see Table 1.3). The six sites put forward were:
 - Site A: Land to the south of Roding Hospital
 - Site B: Fernhall Cottage
 - Site C: The Nine Acre Site
 - Site D: Land at Tomswood Hill
 - Site E: Land to the South of Billet Road, Little Heath
 - Site F: Claire House and Repton Court
- 4.1.4 Each site assessment on these sites carried out in 2013 established how the site's parent parcel was dealt with by the Green Belt review 2010. The 2013 Review Addendum undertook a desk-based and a site-based assessment assessing the sites against NPPF Green Belt purposes using an adapted Methodology from the Green Belt review of 2010. See Appendix 2, section 2.
- 4.1.5 The results of the 2013 Green Belt Addendum are set out in Appendix 2 of this draft review, section 3 8 of the 2013 report.
- 4.1.6 The following text sets out the results of the review of these sites undertaken by Wardell Armstrong in September 2015.



4.2 Site A: Land south of Roding Hospital (within GB11)

- 4.2.1 The site comprises scrubland and woodland. Woodland is predominantly concentrated to the west and south of the site. The site is within a Site of Nature Conservation Importance (SNCI) and an Archaeological Priority Zone (APZ). There are fenced boundaries to the north and east of the site. The site undulates and slopes to the south and an embankment extends along the boundary with the River Roding to the west. The North Circular road is located further to the west.
- 4.2.2 The site does not prevent sprawl nor does it prevent the merging of settlements as it is surrounded by urban development to the north, south and east. Roding Lane South forms the boundary of the site to the south and east and is considered to be a strong and logical barrier to the Green Belt. The site is considered locally important open space and has strong physical and visual links to the wider Green Belt beyond the River Roding and the North Circular, see image 4 which is taken looking south-north along the River Roding and image 5 which is taken looking east-west from an underpass under the North Circular Road (see Appendix 4). In that regard the site safeguards the countryside form encroachment. The urbanised areas to the north and east (recommended for release and potential sub-division in the 2010 report) of the site are less open and appear to have less of a connection to the wider Green Belt. Roding Lane South appears to be a logical boundary for the site's southern and eastern extent.
- 4.2.3 The findings of the 2013 Green Belt Review Addendum are still valid. It is recommended that the site remains in the Green Belt and that it is not sub-divided. However, it is recommended that the Green Belt boundary be realigned to correspond with the western side of Roding Lane South.

4.3 Site B: Fernhall Cottage (within GB11)

- 4.3.1 The site is enclosed to the north, west and south by a fence and some trees. To the east there is an entrance to a house which faces urban development. The site is an 'island' separated by roads extending north-south and west-east. Roding Lane South creates a strong physical boundary to the west and as a consequence, the site does not have a strong physical or visual link to the wider Green Belt to the west. The site does not have any designations.
- 4.3.2 The site does not meet any NPPF purposes. The site is not open and is separated from the wider Green Belt to the west by Roding Lane South. It is physically and visually connected to urban development to the east.



4.3.3 The findings of the 2013 Green Belt Review Addendum are still valid. It is recommended that the site is released from the Green Belt along with 'island' areas to the north and south of the site which are located to the east of Roding Lane South, which would form a strong boundary to the Green Belt.

4.4 Site C: The Nine Acre Site (within GB12)

- 4.4.1 The site slopes to the south and is bounded by mature trees to the west, east and south, the site's boundaries are also well defined by tall fencing. To the south of the site there is a managed playing field, the northern part (later referred to within the 2015 Addendum update as "Site 2: Land East of Owen Gardens and Deacon Way") comprises grassland and a number of trees. The site is physically connected to Claybury Park. It adjoins the Claybury Conservation Area and a Site of Nature Conservation Importance and an APZ designation extends across the site.
- 4.4.2 The site does not prevent sprawl as it surrounded by urban development to the north and west. However, the site is physically connected to the wider Green Belt parcel GB12 and therefore prevents the merging of local centres Clay Hall to the south and Woodford Bridge to the north. Additionally, due to its connection to the wider Green Belt the site helps safeguard the countryside from encroachment and represents locally important open space. It has some contribution towards the setting of the Claybury Conservation Area.
- 4.4.3 It is recommended that the site remain in the Green Belt and that it is not sub-divided.

4.5 Site D: Land at Tomswood Hill (within GB12)

- 4.5.1 The site comprises grassland and parkland within Claybury Park and slopes to the southeast with views available across the wider Green Belt. It is surrounded by urban development at its northern, southern and eastern boundaries. These boundaries are well defined by mature vegetation which creates a strong physical boundary. There are Green Corridor and Heritage Land designations across the entire site and APZ and SNCI designations extend from part of the southern part of the site into the wider Green Belt.
- 4.5.2 The site is open, undeveloped and is contiguous with the remainder of the GB12 parcel. The site does not prevent sprawl and does not prevent the merging of local centres as it is bounded by development to the north, south and east within the same local centre. To the east Tomswood Hill Road creates a strong physical boundary. The site is well connected visually and physically to the remainder of GB12 to the west, in



- this regard it helps safeguard the countryside from encroachment. Additionally, the site represents locally important open space as it forms part of Claybury Park.
- 4.5.3 The findings of the 2013 Green Belt Review Addendum are still valid. It is recommended that the site remain in the Green Belt and that it is not sub-divided.

4.6 Site E: Land to south of Billet Road, Little Heath

- 4.6.1 The site is flat and is comprised of a mixture of scrub land, land for horse grazing and open fields. The site is bounded by residential development within the London Borough of Barking and Dagenham to the east. To the north west is the Hainault House stables (a permitted Green Belt use). To the south there are fields, beyond which are the A12 and Chadwell Heath.
- 4.6.2 The site is enclosed to the east by residential development, however, it is visually connected to GB14 to the south and west and to a lesser extent to the north. The site does to a limited extent prevent urban sprawl from the housing to the east and it prevents the merging of development in Barking and Dagenham with development in Redbridge. The release of the site would isolate areas of GB14 to the south of the site from the wider Green Belt.
- 4.6.3 It is recommended that the site be retained in the Green Belt and that it is not subdivided.

4.7 Site F: Repton Court and Claire House

- 4.7.1 The site has not been previously considered as it located almost entirely outside the established limits of the Green Belt parcel GB12. However, a small section of the north western part of the site is within the Green Belt. The September 2015 site survey revealed that this part of the Green Belt is now built development. The Green Belt boundary does not appear to correspond to any obvious physical boundary. It is thought that this could be the result of a previous mapping error.
- 4.7.2 It is recommended that the Green Belt boundary be amended to follow the physical boundary of Claybury Park which is a more defensible boundary.
- 4.8 Summary: Consistency between the recommendations of the 2013 Green Belt Review Addendum and this draft review.
- 4.8.1 Table 4.1 below summarises the recommendations of the 2013 Green Belt Review Addendum and this draft review.



Table 4.1, Summary of the 2013 Green Belt Review Addendum and This Draft Reviews Findings

Site	Recommendation of the 2013 Green Belt Review Addendum	Recommendations of this draft review
Site A: Land south of Roding Hospital	Total release from Green Belt: NO Potential for sub-division: NO	No change.
Site B: Fernhall Cottage	Total release from Green Belt: YES Potential for sub-division: NO	No change: Additionally it is recommended that 'islands' to the north and south of the site are also released (consistent with 2013 findings)
Site C: The Nine Acre Site	Total release from Green Belt: NO Potential for sub-division: NO	No change.
Site D: Land at Tomswood Hill	Total release from Green Belt: NO Potential for sub-division: NO	No change.
Site E: Land to south of Billet Road, Little Heath	Total release from Green Belt: NO Potential for sub-division: NO	No change.
Site F: Repton Court and Claire House	Total release from Green Belt: NO Potential for sub-division: NO Potential for boundary re- alignment: YES	No change.



5 REVIEW OF GREEN BELT ADDENDUM 2013 (UPDATED 2015)

5.1 *Introduction*

- 5.1.1 The responses received in relation to the 2013 Preferred Options Report were generally supportive, however, some sites attracted objections. As a result the Council committed to undertaking an additional review of alternative strategies to meet the Borough's needs, in order to address the concerns raised during consultations. The Local Plan Preferred Options Report Extension presented four options with the aim of meeting the Borough's need for housing and infrastructure, one of which was to release further land from the Green Belt. The four options were subject to public consultation from 7th November to 22nd December 2014 during which representations were put forward. This 2016 draft review has considered the findings of these representations during the review process.
- 5.1.2 The potential development sites put forward are set out in Table 5.1 below.

Table 5.1, Sites Comparison Between the 2013 Green Belt Review Addendum and the 2015 Green Belt Review Addendum Update

Green Belt Review Addendum 2013	Reassessment of the Site as part of 2015 Green Belt Review Addendum?	Key differences in site boundary
Site A: Land south of Roding Hospital	Yes to reflect new boundary: Site 1 Land south of Roding Hospital (within GB11)	Different boundary (moved to the west along the River Roding)
Site B: Fernhall Cottage	No	N/A
Site C: The Nine Acre Site	Yes to reflect new boundary: Site 2 Land to the east of Owen Gardens and west of Deacon Way (within GB12)	Northern part of Site C: The Nine Acre Site
Site D: Land at Tomswood Hill	No	N/A



Site E: Land to south of Billet Road, Little Heath	Yes to reflect new boundaries: Site 3 Land to the south of Billet Road (within GB14) – including Willow Farm	Different site boundaries comprising two separate areas covering an area south of Billet Road
Site F: Repton Court and Claire House	No	N/A
Sites not previously con	sidered as part of the 2013 Green	Belt Review Addendum
	Yes site was not previously considered: Site 4 Guide Dogs for the Blind, Manor Road Site (within GB12) Yes site was not previously considered: Site 5 Site adjacent to Wanstead Pumping Station (within GB02)	These two sites were not assessed as part of the 2013 Green Belt Review Addendum

- 5.1.3 Each site assessment on these sites carried out in 2015 established how the site's parent parcel was dealt with by the Green Belt review 2010. The 2015 Review Addendum undertook a desk-based and a site-based assessment assessing the sites against NPPF Green Belt purposes using an adapted Methodology from the Green Belt review of 2010. See Appendix 3, section 3.
- 5.1.4 The results of the 2015 Green Belt Addendum are set out in Appendix 3, section 4-9 of this 2016 draft review.
- 5.1.5 The following text sets out the results of the review of these sites undertaken by Wardell Armstrong in September 2015.
- 5.2 Site 1: Land south of Roding Hospital (within GB11)
- 5.2.1 The site is similar to Site A, however the western boundary extends to the bank of the River Roding.
- 5.2.2 The site comprises scrubland and woodland. The site is within a Site of Nature Conservation Importance (SNCI) and an Archaeological Priority Zone (APZ). There are fenced boundaries to the north and east of the site. The site undulates and slopes to



- the south and includes the River Roding which forms the western boundary. The North Circular road is located further to the west.
- 5.2.3 The site does not prevent sprawl nor does it prevent the merging of settlements as it is surrounded by urban development to the north, south and east. Roding Lane South forms the boundary of the site to the south and east and is considered to be a strong and logical barrier to the Green Belt. The site is considered locally important open space and has strong physical and visual links to the wider Green Belt parcel GB09, particularly when looking along the River Roding, this is illustrated by image 4 which looks south-north along the River Roding and by image 5 which looks east-west from an underpass under the North Circular Road (see Appendix 4). In this regard the site safeguards the countryside from encroachment. The urbanised areas to the north and east of the site (recommended for release and potential sub-division in 2010 review and within this 2016 draft review) are less open and appear to have less of a connection to the wider Green Belt.
- 5.2.4 The findings of the 2015 Green Belt Review Addendum are still valid. It is recommended that the site remain in the Green Belt and that it is not sub-divided. It is also recommended that the site become part of GB09.
- 5.3 Site 2: Land to the east of Owen Gardens and west of Deacon Way (within GB12)
- 5.3.1 The site is contained within the boundary of the former Site C known as "The Nine Acre Site", all of the assessments relating to this site in section 3.4 of this draft review are applicable to this site.
- 5.3.2 The site comprises unmanaged grassland and a number of trees. The site slopes to the south and is self-contained by mature trees and fencing along its western, eastern and northern boundaries. To the south of the site there is a managed playing field. The site is connected to the boundary of Claybury Park. The site adjoins Claybury Conservation Area and a SNCI designation. An APZ designation extends across the site.
- 5.3.3 Site 2 does not prevent sprawl as it surrounded by urban development to the north and west. The site is visually and physically connected to the wider Green Belt to the south. The site prevents the merging of local centres to the north and south as it is connected to the wider Green Belt parcel GB12. In this regard the site represents locally important open space and helps safeguard the countryside from encroachment. The site is not located within or adjacent to a historic town however, it is located adjacent to the western boundary of the Claybury Conservation Area and has some contribution towards the setting of the Claybury Conservation Area.



- 5.3.4 It is recommended that the site remain in the Green Belt and that it is not sub-divided.
- 5.4 Site 3: Land to the south of Billet Road (within GB14)
- 5.4.1 Site 3 has two boundaries, one is a larger site extending from the London Borough of Barking and Dagenham to the east to Hainault Road in the west. A smaller Site 3 is also assessed, this site covers Willow Farm. The two sites are considered together as the Willow Farm site is a small part of the entire area of Site 3.
- 5.4.2 The site is flat and comprises scrub land, land for horse grazing and open fields. The site is bounded by residential development within the London Borough of Barking and Dagenham to the east; residential development located along part of Billet Road to the north west; and playing fields to the west. The site is bound by the A12 to the south.
- 5.4.3 The site is enclosed to the east and north west by residential development. The site is visually and physically connected to the wider Green Belt parcel of GB14 to the north, however this connection is reduced by the presence of Hainault House stables, Red House Farm and development to the north west. The site does not prevent urban sprawl as it is surrounded by housing development especially to the east and beyond the A12 to the south. It does not prevent the merging of local centres as the local centres of Redbridge and Barking and Dagenham have existing physical and visual coalescence to south east of the site. The site is generally self-contained however, it has some visual connection to the wider Green Belt to the north including the remainder of GB14. The site is physically isolated from the remainder of GB14 due to the presence of development located along the majority of Billet Road. In that regard the site does not safeguard the countryside from encroachment. However due to the presence of playing fields and due to the sites relative openness, it does represent locally important open space.
- 5.4.4 It is recommended that the entirety of Site 3 (including Site 3 Willow Farm and Site E: Land to south of Billet Road, Little Heath) be released from the Green Belt. In addition it is recommended that the Green Belt boundary be amended to extend along Billet Road to the junction with Hainault Road. As a consequence it is recommended that all of the land to the north of Billet Road is released from the Green Belt (labelled GB14c on drawing ST14122-004).



5.5 Site 4: Guide Dogs for the Blind, Manor Road Site (within GB12)

- 5.5.1 The site is privately owned land, as a result only the Guide Dogs for the Blind Offices could be accessed during the September 2015 site assessment. However, views from the boundaries of the site, together with the onsite analysis obtained as part of the 2015 Green Belt Review Addendum have informed this report's findings.
- 5.5.2 The site is undulating and slopes to the east and the south. A training area and kennels are located within the site, these are enclosed by bunds and do not affect the openness of the site and they are not visible from Manor Road to the north. The site is distinct in character from the Guide Dogs for the Blind offices to the west, which is urban in character. In addition, the site is physically connected to Claybury Park and adjoins the Claybury Conservation Area.
- 5.5.3 Inspection of the southern boundary with Claybury Park revealed that the site is physically connected to the rest of GB12. The site survey in February 2015 confirmed that there are views of the remainder of GB12 from within the site and found the site to be visually connected due to the topography within the site. In this regard the site safeguards the countryside from encroachment, represents locally important open space and contributes to the setting of the Claybury Conservation Area. The site also forms a physical link to an area of Green Belt to the east of the site. If Site 4 was released in conjunction with the hospital site as recommended for release by the 2010 report, it would isolate this area of land to the east of the site from the remainder of the GB12 parcel.
- 5.5.4 The findings of the 2015 Green Belt Review Addendum are still valid. It is recommended that the site remain in the Green Belt and that it is not sub-divided.
- 5.6 Site 5: Site adjacent to Wanstead Pumping Station (within GB02)
- 5.6.1 The site forms part of the narrow link between parcels GB02 and GB09 of the Green Belt.
- 5.6.2 The site is screened by mature vegetation and trees to the north and east and these boundaries are well defined by palisade fencing. Land to the south and west is open to the remainder of the Wanstead Pumping Station site. The site has strong physical and visual links to the wider Green Belt, especially to the south and west, in this regard it protects the countryside from encroachment. The site also helps to maintain a gap between settlements to the east along Royston Gardens and development along River



Close to the west. It also is key to maintaining a link between GB02 and GB09 of the Green Belt.

- 5.6.3 It is recommended that the site remain in the Green Belt and that it is not sub-divided.
- 5.7 Summary: Consistency between the recommendations of the 2015 Green Belt Review Addendum and this draft review.
- 5.7.1 Table 5.2 below summarises the recommendations of the 2015 Green Belt Review and this report.

Table 5.2, Summary of the 2015 Green Belt Review Addendum and This Draft Reviews Findings

Site	Recommendation of the 2015 Green Belt Review Addendum	Recommendation of this draft review
Site 1: Land south of Roding Hospital	Total release from Green Belt: NO	No change.
	Potential for sub-division: NO	Additionally, it is recommended that the site become part of GB09.
Site 2: Land to the east of Owen Gardens and west of Deacon Way	Total release from Green Belt: NO Potential for sub-division: NO	No change.
Site 3: Land to the south of Billet Road	Total release from Green Belt: NO Potential for sub-division: NO	It is recommended that the site be released from the Green Belt and that the boundary be amended to extend along Billet Road to the junction with Hainault Road.
Site 4: Guide Dogs for the Blind, Manor Road Site	Total release from Green Belt: NO Potential for sub-division: NO	No change.



Site	Recommendation of the 2015 Green Belt Review Addendum	Recommendation of this draft review
Site 5: Site adjacent to Wanstead Pumping Station	Total release from Green Belt: NO Potential for sub-division: NO	No change.



6 SUMMARY AND KEY FINDINGS

6.1 **Summary**

- 6.1.1 The London Borough of Redbridge is currently preparing their Local Plan 2015 2030, as such there is a need to ensure that the current evidence base; used to inform the Preferred Options Report (January 2013), is robust and up to date.
- 6.1.2 This 2016 draft review has updated and collated the existing Green Belt studies to ensure they are consistent with current national policy, and to evaluate whether their conclusions are still valid.

6.2 Key findings

- 6.2.1 Following a fresh review of all sixteen Green Belt parcels and the sites suggested for release from the Green Belt, the findings of this 2016 draft review are consistent with the majority of the previous recommendations. As a consequence the following areas of land identified within the 2010 Green Belt review are recommended for release from the Green Belt:
 - GB11b
 - GB11c
 - GB12b
 - GB12c
 - GB13b
 - GB14b
 - GB16b (i.e. all of GB16)
- 6.2.2 These areas of land are marked on drawing ST14935-004.
- 6.2.3 In addition, it is recommended that a small area of land between GB04 (Woodford Green) and GB05 (Epping Forest Hatch and Woodford Golf Course) identified within the 2010 Green Belt review should be added to the Green Belt.
- 6.2.4 The findings of this 2016 draft review are also consistent with the 2013 Green Belt Review Addendum. It recommended that a small urbanised area of land within GB11 (Site B: Fernhall Cottage) and two islands of land to the north and south be released from the Green Belt. This 2016 draft review recommends that this land should be released from the Green Belt, this area is labelled GB11c on drawing ST14935-004.
- 6.2.5 A number of minor boundary changes are recommended within GB03 (Snaresbrook Crown Court and Walthamstow Forest) and GB12 (Claybury Hospital) labelled as areas



GB03b and GB12d on drawing ST14122-004. It is also recommended that the area of the land within of GB13 (Hainault Fields) comprising Forest Park Cemetery & Crematorium is relabelled GB13a and that the remaining area of land within GB11 (Roding Hospital) be amalgamated with GB09 (Roding Valley Park). Table 6.1 below summarises these recommendations and drawings ST14935-004 and ST14935-005 in Appendix 5 of this review illustrate these recommendations.

6.2.6 Furthermore, it is recommended that the entirety of Site 3: Land South of Billet Road (including Site 3 Willow Farm and Site E: Land to south of Billet Road, Little Heath) be released from the Green Belt. In addition it is recommended that the Green Belt boundary be amended to extend along Billet Road to the junction with Hainault Road. This is illustrated by drawing ST14395-004 and the area recommended for release is labelled GB14c.

Table 6.1, Recommendations

Parcel	Summary of recommendations
GB03: Snaresbrook Crown Court and	It is recommended that the boundary of the northern
Walthamstow Forest	part of GB03 is amended to ensure a more
	permanent physical boundary between Green Belt
	land adjacent playing fields, labelled as GB03b on
	drawing ST1412-004.
GB04: Woodford Green	It is recommended that the area of land between
	GB04 and GB05 identified within the 2010 Green Belt
	review is included within the Green Belt (labelled as
	GB04a on drawing ST14122-004).
GB11: Roding Hospital and surrounding Green Belt	It is recommended that GB11b and GB11c be released from the Green Belt. In addition it is recommended that the eastern boundary of GB11 is amended to correspond with Roding Lane South, to ensure a more permanent boundary between Green Belt land and adjacent urban development. It is also recommended that the remaining area of GB11 is
	amalgamated with GB09.
GB12: Claybury Hospital	It is recommended that GB12b and GB12c are
	released from the Green Belt.
	In addition a small boundary change should be
	implemented corresponding to the boundary
	between Claybury Park and Site F (Repton Court and



Parcel	Summary of recommendations		
	Claire House), labelled as GB12d on drawing		
	ST14122-004.		
GB13: Hainault Fields	It is recommended that GB13b is released from the		
	Green Belt. In addition, it is recommended that the		
	area of the land within GB13 comprising Forest Park		
	Cemetery & Crematorium is relabelled GB13a.		
GB14: Fairlop Plain	It is recommended that GB14b is released from the		
	Green Belt.		
	It is also recommended that Site 3: Land South of		
	Billet Road (including Site 3 Willow Farm and Site E:		
	Land to south of Billet Road, Little Heath) is released		
	from the Green Belt. In addition, it is recommended		
	that the Green Belt boundary be amended to extend		
	along Billet Road to the junction with Hainault Road,		
	labelled GB14c on drawing ST14122-004.		
GB16: King George / Goodmayes Hospitals	It is recommended that GB16b is released from the		
	Green Belt i.e. all of GB16.		

6.2.7 Table 6.2 below sets out the recommendations of all previous Green Belt reviews and of this update to those reviews.

Table 6.2, Summary of This Update to Previous Reviews

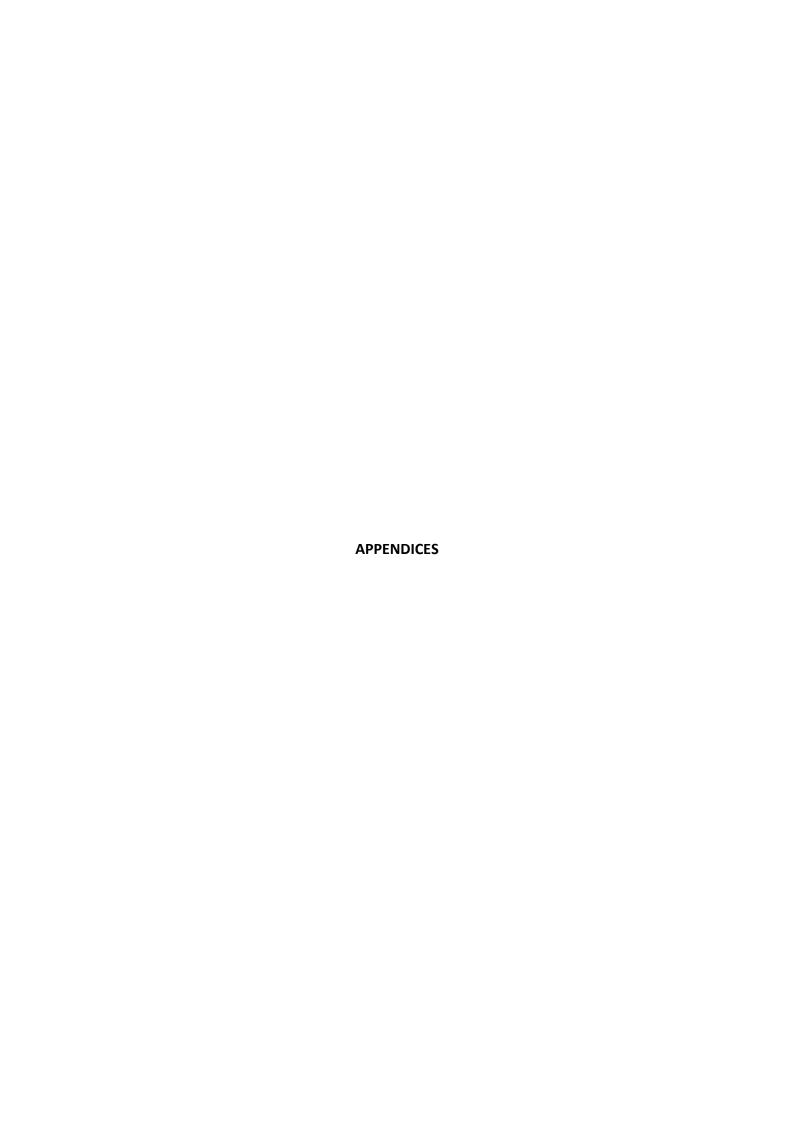
Parcel / site	Recommended for release	Recommended for sub-division	Recommended boundary amendment	Additional areas recommended for inclusion
	20	010 Green Belt Revie	w	
GB01				
GB02				
GB03			Х	
GB04				Х
GB05				
GB06				
GB07				



Darrol / site	Posomerus de d	Posome we say de d	Posome mental al	Additional
Parcel / site	Recommended for release	Recommended for sub-division	Recommended boundary	Additional areas recommended
		3110001	amendment	for inclusion
CDOS				
GB08				
GB09				
GB10				
GB11		Х	Х	
GB12		Х	Х	
GB13		х		
GB14		х		
GB15				
GB16	Х			
	2013 Gr	een Belt Review Add	dendum	
Site A				
Site B	Х			
Site C				
Site D				
Site E				
Site F			Х	
2015 Green Belt Review Addendum				
Site 1				
Site 2				
Site 3	Х			
Site 4				



Parcel / site	Recommended for release	Recommended for sub-division	Recommended boundary amendment	Additional areas recommended for inclusion
Site 5				













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