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LONDON BOROUGH OF REDBRIDGE

GREEN BELT REVIEW ADDENDUM

FEBRUARY 2017

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Wardell Armstrong

Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom
Telephone: +44 (0)845 111 7777 Facsimile: +44 (0)845 111 8888 www.wardell-armstrong.com



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FEBRUARY 2017

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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. These addendums assessed areas within Green Belt where representations had been made.
- 1.1.3 Wardell Armstrong were then commissioned by London Borough Redbridge in 2015, 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 were still valid. This study comprised a complete review as to whether the current Green Belt continued to fulfil Green Belt purposes. The Intention was to identify any opportunities for release of land from the Green Belt where to do so would not compromise Green Belt purposes as set out in the NPPF. For the original 2010 review, no specific sites had been put forward. Between 2010 and 2015 representations had been made which therefore necessitated further scrutiny. The Wardell Armstrong 2015 review provided the opportunity to consider the findings of the original 2010 review in the light of fresh analysis.
- 1.1.4 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 fulfils the Green Belt purposes as set out within the NPPF.
- 1.1.5 The review (completed in January 2016) formed part of the Council’s evidence base for the Borough’s emerging Local Plan.
- 1.1.6 A number of responses were received during the consultation period for the pre-submission stage (28th July – 30th July 2016) of Redbridge Councils Local Plan 2015-2030. These responses have been considered as part of this addendum report. The responses (and where they have been addressed, with regard to specific locations, within this report), are as follows:-

- A letter from the Mayor of London (reference LDF26LDD15/BS), dated 11th October 2016. (Refer to sections 3.12, 3.13, 3.14, 3.15 and 3.17 of this addendum report).
- *Green Belt Review: Oakfield Playing Fields* on behalf of the Save Oakfields Society, dated September 2016. (Refer to section 3.14 of this addendum report).
- Representations on Land at Roding Lane South, Redbridge on behalf of Todcham Ltd, dated September 2016. (Refer to section 3.12 of this addendum report).
- Representations submitted on behalf of Barking, Havering and Redbridge (University Hospitals) NHS Trust regarding land at King George Hospital, dated September 2016. (Refer to section 3.17 of this addendum report).
- Representations submitted on behalf of North East London NHS Foundation Trust (NELFT), in relation to land around Goodmayes Hospital, dated September 2016. (Refer to section 3.17 of this addendum report).
- Representations submitted on behalf of the Guide Dogs for the Blind Association, dated September 2016. (Refer to section 3.13 of this addendum report).
- Representations submitted on behalf of Crest Nicholson Eastern for land at Tomswood Hill, dated September 2016. (Refer to section 3.13 of this addendum report).
- Representations submitted on behalf of Ford Motor Company Ltd and Fords Sports and Social Trust in relation to the Ford Sports and Social Club, Newbury Park, dated September 2016. (Refer to section 3.17 of this addendum report).
- Representations submitted by AECOM on behalf of East Thames, in relation to land at Billet Road, dated September 2016. (Refer to section 3.15 of this addendum report).
- Representations from the Aldborough Hatch Defence Association, dated September 2016. (Refer to section 3.15 of this addendum report).
- Representations from CBRE Limited for Bancroft's School. (Refer to section 3.9 of this addendum report).
- Representations from Dalton Warner Davis on behalf of the PDSA in relation to land on the north side of Woodford Bridge Road, dated September 2016. (Refer to section 3.12 of this addendum report).
- Submission from the Education Funding Agency, dated September 2016.

1.1.7 The majority of these responses refer to particular locations within the Green Belt. However, general comments in relation to the Green Belt Review (January 2016) were set out in the letter from the Mayor of London.

1.1.8 The Mayor's letter states: -

"The Mayor notes Redbridge's commitment to protecting designated Green Belt and Metropolitan Open Land (MOL); however Redbridge is proposing to release six Green Belt sites. The Mayor has made clear that in line with his manifesto pledge, he wishes to protect Green Belt land.

The NPPF seeks to protect the Green Belt and paragraph 83 states the Green Belt boundaries should only be altered in "exceptional circumstances" through the preparation or review of the Local Plan. The London Plan is clear that growth will be supported, but without encroaching on the Green Belt (policy 1.1 B a) and that Green Belt should be protected from "inappropriate development" (policy 7.16 A). The Mayor strongly supports the current extent of London's Green Belt. He believes that "exceptional circumstances" for the release of these sites has not been demonstrated."

1.1.9 The Council is aware that some recent green belt reviews carried out by other local authorities have been criticised for focusing, solely or in large measure, on local interpretations and applications of the Green Belt purposes set out in the NPPF. The Council therefore has requested Wardell Armstrong to revisit and review the approach taken to the Green Belt purposes in earlier assessments of the Green Belt in Redbridge, to ensure that the assessment and conclusions are fully grounded in the Green Belt purposes as set out in the NPPF. The Green Belt within Redbridge, together with the conclusions of earlier assessments, has been reviewed in this context.

1.1.10 In the light of this and the representations and responses received in relation to the draft Local Plan, this addendum report, which should be read in conjunction in particular with the January 2016 Green Belt Review, provides further clarification of how the Green Belt parcels within Redbridge contribute to the five purposes set out by the NPPF.

2 THE NPPF AND GREEN BELT

2.1 Green Belt Purposes

2.1.1 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.)

2.1.2 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.)

2.1.3 Each of these five purposes are considered below.

“To check the unrestricted sprawl of large built up areas”

2.1.4 Any land in adjoining local authorities will need to be considered when establishing the role played by the Green Belt. The Council have held Duty to Cooperate meetings with all neighbouring boroughs as part of the process of producing the local plan and no neighbouring boroughs expressed any intentions of releasing Green Belt land close to the borough boundary.

2.1.5 In terms of this first green belt purpose, where parts of the Green Belt are surrounded by urban development or have already been significantly encroached onto by development, these areas are considered to not prevent sprawl. However, Green Belt may check sprawl between distinct areas of urban development into open areas of land. Such areas may therefore be important in achieving this NPPF Green Belt purpose and it is considered reasonable and appropriate to have regard to this function of the Green Belt in the context of the first of the Green Belt purposes as set out in the NPPF.

“To prevent neighbouring towns from merging into one another”

2.1.6 The interpretation of this NPPF purpose relates to the definition of what is meant by the word “town”. A literal translation of this purpose would for example be that the Green Belt prevents the urban conurbation of Greater London from merging with surrounding towns such as Epping to the north and Romford to the east. However, a reasonable interpretation of this NPPF purpose, in the context of the pattern of development in London, is that the Green Belt prevents the merging of neighbouring settlements.

2.1.7 This addendum interprets settlements within or adjacent to the Borough as being:-

- 1) Manor Park/Leytonstone/Walthamstow/Highams Park/Chingford
- 2) Aldersbrook
- 3) Snaresbrook/Wanstead/ South Woodford/Woodford Green/Buckhurst Hill
- 4) Woodford Bridge
- 5) Ilford / Gants Hill / Redbridge / Clayhall / Barkingside / Grange Hill / Newbury Park / Aldborough Hatch / Seven Kings / Goodmayes / Little Heath / Chadwell Heath
- 6) Romford/Collier Row
- 7) Hainault
- 8) Chigwell

“To assist in safeguarding the countryside from encroachment”

2.1.8 The interpretation of this NPPF Green Belt purpose relates to the definition of what is meant by the word “countryside”. A literal translation of this would be open undeveloped land beyond the urban edge that is used for agriculture (arable or pasture), woodland or land otherwise categorised as “Open Access Land” under the Countryside and Rights of Way (CROW) Act 2000.

2.1.9 Redbridge is generally urbanised and comprises medium - high density development, which is typical of the wider London conurbation. “Countryside” under this definition is often constrained to small areas. It is therefore a reasonable interpretation that “countryside” includes the following land uses, where such land is contiguous or connected with other more conventional “countryside”, as defined above in para 2.1.8:-

- Land used for grazing for horses.
- Sports pitches/amenity grassland areas.

- Allotments.
- Cemeteries.

2.1.10 However, where areas of land used for grazing for horses; sports pitches/amenity grassland areas; allotments; and cemeteries are not contiguous with/connected to other “countryside”, it is not considered that such land fulfils this NPPF purpose.

2.1.11 For example, land within the major part of Green Belt parcel GB11, i.e. GB11b, includes playing fields and some limited grazing by horses but it is unconnected to other areas which could be described as “countryside”. Accordingly GB11b does not fulfil the purpose of “safeguarding the countryside from encroachment”. By contrast sports fields and allotments in GB10 are strongly connected to semi-natural woodland both within GB10 and to grassland, scrub and woodland within GB09. Therefore these sports fields and allotments form part of a contiguous area of “countryside” and therefore fulfil this Green Belt purpose. In terms of assessing contiguous areas of countryside, land uses in adjoining local authority areas also need considering.

2.1.12 The NPPF Green Belt purpose; “to preserve the setting and special character of historic towns” is not of relevance to Redbridge, as whilst there are a number of Conservation Areas which contribute to the setting and special character of the area, there are no “historic towns” as applied to national Green Belt policy. This NPPF Green Belt purpose is therefore not examined further within this Addendum Report.

2.1.13 The 2010 Green Belt review concluded that the NPPF Green Belt purpose; “to assist in urban regeneration by encouraging the recycling of derelict and other urban land” was irrelevant to a Green Belt review 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.)

2.1.14 This is because this NPPF Green Belt purposes appears, from its wording, to be equally applicable to all Green Belt land. In considering the relative importance of different areas of land to Green Belt purposes and the implications of potential releases of Green Belt land for development, it is not relevant in distinguishing one area of Green Belt land from another.

2.1.15 The Council has considered all non-Green Belt land and previously developed land as part of their Strategic Housing Land Availability Assessment, and all brownfield sites offering reasonable prospects for development have subsequently been included as

Development Opportunity Sites in the Local Plan. 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 is not considered further within this Addendum Report.

Green Belt Boundaries

2.1.16 When determining Green Belt boundaries the NPPF makes clear that boundaries should be permanent and defensible 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.)

2.1.17 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.)

2.1.18 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.)

2.1.19 In that regard local planning authorities should be satisfied that Green Belt boundaries are well defined by permanent physical features which will remain relevant beyond the Local Plan period if required. Areas that continue to fulfil Green Belt purposes should be retained within the Green Belt.

2.1.20 This addendum report sets out how each Green Belt parcel performs against the three relevant NPPF purposes of Green Belt, as construed above in the Redbridge context, and provides commentary on any proposed boundary changes to ensure boundaries remain relevant beyond the plan period.

3 GREEN BELT PARCELS

3.1.1 For the original Green Belt review (2010), 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

3.1.2 The 2010 Green Belt review made recommendations as to whether these Green Belt parcels should be considered for sub-division. Potential for sub-division was recommended where part of the Green Belt parcel was considered to no longer fulfil Green Belt purposes. The location of these parcels and areas for sub-division (i.e. areas considered to no longer fulfil Green Belt purposes), is shown on Drawing ST14935-001 in Appendix 1.

3.1.3 Green Belt changes recommended by the January 2016 Green Belt review, including areas for sub-division, are shown on Drawing ST14935-004 in Appendix 1.

3.1.4 Each of these sixteen parcels is considered below in relation to the following national Green Belt purposes as set out in the NPPF and as construed in section 2 above:-

- 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.

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 a Site of Special Scientific Interest (SSSI) and Sites of Importance for Nature Conservation (SINC) designations, ancient and semi-natural woodland and a network of ponds. There are sports pitches and areas of amenity grassland but these form a contiguous part of the larger area. 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 Accordingly, the parcel represents 'countryside' and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"To assist in the safeguarding the countryside from encroachment"*.

3.2.3 With the exception of where it links to other Green Belt parcels, GB01 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 settlements.

3.2.4 Accordingly, the parcel prevents 'settlements' from coalescing and its retention within the Green Belt thus fulfils the NPPF Green Belt purpose of *"To prevent neighbouring towns merging into one another"*.

3.2.5 The findings of the 2010 and January 2016 reviews 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. GB02 links with GB01 to the west. 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 (which is not to be released from Green Belt, including the City of London Cemetery) and thus forms part of a contiguous corridor of Green Belt. The parcel includes sports pitches, golf courses, a cemetery and allotments but these form a contiguous part of the larger area.

3.3.2 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“To assist in the safeguarding the countryside from encroachment”*.

3.3.3 GB02 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 settlements.

3.3.4 Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt thus fulfils the NPPF Green Belt purpose of *“To prevent neighbouring towns merging into one another”*.

3.3.5 The findings of the 2010 and January 2016 reviews 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. It safeguards the countryside from encroachment as it provides links to the wider Green Belt along its western border.

3.4.2 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“To assist in the safeguarding the countryside from encroachment”*.

- 3.4.3 GB03 does not prevent urban sprawl since, whilst it forms part of the wider Green Belt which extends into the local authority area of Waltham Forest, the whole of this area is surrounded by urban development. However the parcel does provide a break between Snaresbrook/Wanstead/ South Woodford and Walthamstow.
- 3.4.4 Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt thus fulfils the NPPF Green Belt purpose of “*To prevent neighbouring towns merging into one another*”.
- 3.4.5 **It is recommended that the parcel remain in the Green Belt and that it is not subdivided.**
- 3.4.6 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. Similarly, a SSSI is shown by the Primary Constraints map to be within the same boundary. Both of these differences in boundaries are likely to have arisen in the past because of less sophisticated mapping data, leading to what now constitutes a mapping error.
- 3.4.7 Guidance within the NPPF states that Green Belt should only be altered in “*exceptional circumstances*”. Since mapping errors have now been identified and amendment to these boundaries would provide coherence to Green Belt boundaries, it is considered that such a change would be justified as fulfilling “*exceptional circumstances*”. **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, thus according with paragraph 85 of the NPPF. This proposed boundary change is shown on drawings ST15916-004 and ST15916-006 in Appendix 2.
- 3.5 **GB04: Woodford Green**
- 3.5.1 The parcel is generally flat and its boundaries are formed by roads and development. It includes ponds and woodland. 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. The northern section is linked to the Green Belt and Epping Forest to the west. The 2010 Green Belt review had recommended a further addition to the Green Belt to strengthen this linkage. 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 SINCR which both link with Epping Forest. The parcel includes amenity grassland and a cricket ground but these form a contiguous part of the larger area.

- 3.5.2 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to assist in the safeguarding the countryside from encroachment”*.
- 3.5.3 This parcel, when considered in isolation, does not prevent sprawl nor does it prevent the merging of towns in the Borough. It is predominately surrounded by urban development, however, the southern part is connected to the wider Green Belt. The wider Green Belt maintains a gap between the settlements of Chingford to the west and Woodford Green to the east.
- 3.5.4 Accordingly, because the parcel links to the wider Green Belt which prevents ‘settlements’ from coalescing within the wider Green Belt, its retention within the Green Belt partially fulfils the NPPF Green Belt purpose of *“to prevent neighbouring towns merging into one another”*.
- 3.5.5 The findings of the 2010 and the January 2016 Green Belt reviews 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. 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. It is unclear as to why this small area of land was not included within the Green Belt, as its omission does not seem to take account of the connection to Green Belt on the other side of the LPA boundary. It would appear to be illogical not to have included this land with the Green Belt and it is assumed that it was overlooked in error, or alternatively there was a mapping error, leading to its unwarranted exclusion from the Green Belt.
- 3.5.6 Guidance within the NPPF states that Green Belt should only be altered in *“exceptional circumstances”*. Since mapping errors have been identified and amendment to the boundary would provide coherence to Green Belt boundaries, it is considered that such a change would be justified as fulfilling *“exceptional circumstances”*. This proposed change is shown on drawings ST15916-004 and ST15916-007 in Appendix 2.

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

3.6.1 GB05 is a large 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. This parcel is well connected to the wider Green Belt outside Redbridge to the west and north.

3.6.2 Accordingly, the parcel represents 'countryside' and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"to assist in the safeguarding the countryside from encroachment"*.

3.6.3 When considered in isolation, the parcel does not prevent sprawl as the wider Green Belt is surrounded by urban development, nor does it prevent the merging of neighbouring settlements with the Borough. However, GB05 to the west and north maintains a gap between Chingford to the west and Woodford Green to the east and prevents coalescence to these local settlements.

3.6.4 Accordingly, because the parcel links to the wider Green Belt which prevents 'settlements' from coalescing, its retention within the Green Belt partially fulfils the NPPF Green Belt purpose of *"to prevent neighbouring towns merging into one another"*.

3.6.5 The findings of the 2010 and January 2016 Green Belt reviews 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 SINCC. It is therefore very important to the biodiversity of the area. 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 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“To assist in the safeguarding the countryside from encroachment”*.

3.7.3 Reed’s Forest does not prevent sprawl nor does it prevent the merging of neighbouring settlements as it is surrounded by urban development, it is essentially an extension to GB05.

3.7.4 The findings of the 2010 and January 2016 Green Belt reviews 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 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 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to assist in the safeguarding the countryside from encroachment”*.

3.8.3 Knighton Wood does not prevent sprawl nor does it prevent the merging of neighbouring settlements. It represents the southwest corner of Buckhurst Hill, which is located outside of Redbridge and is as a whole surrounded by urban development.

3.8.4 The findings of the 2010 and January 2016 Green Belt reviews 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 Representations from CBRE Limited have been submitted for the Bancroft’s School site within this parcel, see paragraph 3.9.7 below.

3.9.2 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. This section creates a corridor that extends southwards, linking to other parcels within the Borough. GB08 comprises woodland, grasslands and the River Roding and includes a

SINC. Amenity grassland and sports pitches are open and are contiguous with the larger area.

3.9.3 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to assist in the safeguarding the countryside from encroachment”*.

3.9.4 The parcel does prevent sprawl since, although surrounded by urban development to the east and south west, there are connections to the wider Green Belt to the north (within Epping Forest District) and to the south (connected to GB09). Accordingly, the parcel fulfils the NPPF purpose of *“to check the unrestricted sprawl of large built-up areas”*.

3.9.5 In addition it separates Woodford Bridge to the east and Woodford Green to the west. The parcel is open, is of significant size and is contiguous with the wider Green Belt.

3.9.6 Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to prevent neighbouring towns merging into one another”*.

Bancroft’s School

3.9.7 The site is located adjoining the western boundary of GB08. It comprises playing fields with urban development on the southern and western boundaries and tree planting on the northern and eastern boundaries with Ray Park beyond. The site is physically contiguous with the remainder of GB08. The site connects to ‘countryside’ and its retention within the Green Belt therefore fulfils the NPPF Green Belt purpose of *“to assist in the safeguarding the countryside from encroachment”*.

3.9.8 The findings of the 2010 and January 2016 Green Belt reviews 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. It comprises grassland, scrub and woodland. The majority of GB09 is classed as a SINC and therefore the biodiversity value is high. There are sports facilities and allotments but these form a contiguous part of the larger area. This is reinforced by the strong physical linkage to GB08; GB10; GB02; and thus with other parcels within and beyond the Borough boundary.

3.10.2 Accordingly, it is considered that the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of “*to assist in the safeguarding the countryside from encroachment*”.

3.10.3 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 designation create further barriers to development. However, the parcel prevents the merging of settlements within the London conurbation, specifically Wanstead/South Woodford/Woodford Green with Ilford/Redbridge/Clayhall.

3.10.4 Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of “*to prevent neighbouring towns merging into one another*”.

3.10.5 The findings of the 2010 and January 2016 Green Belt reviews 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. Semi-natural woodland on this western boundary is located within a SINC. Ponds and ditches within the site provide further biodiversity value. There are sports facilities and allotments but these form a contiguous part of GB10 and the Roding Valley to the west. 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.

3.11.2 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of “*to assist in the safeguarding the countryside from encroachment*”.

3.11.3 GB10 does not prevent sprawl. However, it does prevent the merging of settlements namely, South Woodford/Woodford Green to the west, Ilford/Redbridge/Clayhall to the east and Woodford Bridge to the north.

3.11.4 Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of “*to prevent neighbouring towns merging into one another*”.

3.11.5 The findings of the 2010 and January 2016 Green Belt reviews 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 Representations dated September 2016 from Dalton Warner Davis have been submitted on behalf of the PDSA in relation to land on the north side of Woodford Bridge Road and on behalf of Todcham Ltd for land at Roding Lane South within this parcel.

3.12.2 The 2010 Green Belt review recommended that a significant portion of this parcel be released from the Green Belt. The area surrounding and to the north of Spire Roding Hospital and Hatton School is relatively developed. As a result it was recommended for release, labelled as GB11b (see drawing ST14935-004 in Appendix 1). The GB11b area is associated with the Spire Roding Hospital; electrical substation; and Hatton School and Special Needs Centre to the west and Beal High School and development located along Woodford Bridge Road to the east. Playing fields and some limited grazing by horses are present within GB11b but these are unconnected to areas which could be described as “countryside”. GB11b does not prevent sprawl as it is surrounded by urban development. Neither does it prevent neighbouring settlements merging, as the surrounding development forms part of the same settlement within Redbridge, i.e. Clayhall/Redbridge. It does not therefore meet any of the NPPF Green Belt purposes.

3.12.3 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. The September 2015 site visit found that this recommendation was valid. This part of the parcel is labelled GB11c on drawing ST14935-004 in Appendix 1 and shown in more detail on drawing ST15916-008 in Appendix 2. It relates strongly to urban and residential development to the east and it does not meet any national Green Belt purposes.

Land at Roding Lane South

3.12.4 The comments below refer to the remaining area of land which adjoins GB09, namely *Land at Roding Lane South*, located to the south of Roding Hospital, which has been put forward in representations to the pre-submission Draft Local Plan. This land corresponds to land put forward in previous submissions as Site A and Site 1 (see drawings ST14935-002 and ST14935-003 respectively in Appendix 1).

- 3.12.5 The site generally comprises scrubland and woodland. The site is within a Sites of Importance for Nature Conservation (SINC). There are fenced boundaries to the north and east of the site. The site undulates and slopes to the south. The River Roding is located beyond the western boundary. The North Circular road is located further to the west.
- 3.12.6 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.
- 3.12.7 This site was visited with the representation's team on the 7th December 2016. The site comprises a grazed field to the north east with the remainder of the site comprising semi-natural woodland and scrub which is denser to the south and to the west of the site. It therefore comprises "countryside" in the context of Redbridge. It is visible as such from Roding Lane South and the footpath to the south of the site. It is physically and visually connected to land with a similar character to the north and south on the opposite bank of the River Roding, and also land to the immediate south, within GB09 which is connected to the wider Green Belt.
- 3.12.8 Accordingly, the site represents 'countryside' and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"to assist in the safeguarding the countryside from encroachment"*.
- 3.12.9 The representations for this land suggest that the Green Belt boundary could be redrawn to correspond with a low, wooded ridge of topography/bunding to the east of the River Roding. However, land on both sides of this proposed boundary would be very similar in character, both sides comprising "countryside".
- 3.12.10 By contrast re-alignment of the Green Belt boundary to correspond with the alignment of Roding Lane South would ensure a well-defined boundary *"using physical features which are readily recognisable and likely to be permanent"* as required by the NPPF.
- 3.12.11 **It is recommended that with the exception of the two areas previously referred to as GB11b and GB11c (see drawing ST14935-004 in Appendix 1 and drawing ST15916-008 in Appendix 2) the parcel remains in the Green Belt and that it is not sub-divided further.**

3.13 **GB12: Claybury Hospital**

3.13.1 Representations have been submitted for this parcel on behalf of the Guide Dogs for the Blind Association and on behalf of Crest Nicholson Eastern for land at Tomswood Hill, dated September 2016.

3.13.2 The 2010 Green Belt review suggested that two areas of the parcel be released from the Green Belt and that there should be a minor amendment to the southern boundary. The two areas suggested for release are labelled as GB12b and GB12c on drawing ST14935-004 in Appendix 1. The January 2016 review concurred with that assessment that these areas do not fulfil Green Belt purposes. The minor amendment to the southern boundary was labelled as GB12d on drawing ST14935-004 in Appendix 1. A more detailed map of all boundaries in this parcel is also shown in drawing ST15916-009 in Appendix 2. These are commented on below.

GB12b

3.13.3 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 as it is surrounded by urban development, to the north and east. GB12b does not prevent neighbouring settlements from merging as surrounding development is part of Clayhall/Barkingside/Grange Hill. 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 as it is already developed. Further commentary on the boundaries of GB12b is set out below at paragraph 3.13.22.

GB12c

3.13.4 The area relating to GB12c comprises residential development on Hoveton Way; Acle Close; Stalham Way; Wroxham Way; Ludham Close; and Martham Close. Examination of historic mapping shows that this land formally included playing fields which have since been built on. This area does not now meet any national Green Belt purposes and, given its developed state, it is recommended that it is removed from the Green Belt.

GB12d

3.13.5 In addition, 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 in

Appendix 1 and drawing ST15916-009 in Appendix 2). This boundary change would be consistent with Paragraph 85 of the NPPF.

- 3.13.6 It is recommended that the findings of the 2010 and January 2016 reviews be carried forward and these areas are released from the Green Belt.

Remaining land within GB12

- 3.13.7 The comments below refer to the remaining area of land within GB12 which is undulating and slopes down towards the south. There is extensive woodland separated by areas of parkland and grassland. The majority of the parcel is a SINC 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. The parcel is connected to GB10 and thus the wider Green Belt.

- 3.13.8 Accordingly, the parcel represents 'countryside' and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"to assist in the safeguarding the countryside from encroachment"*.

- 3.13.9 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 Clayhall/Barkingside and Woodford Bridge.

- 3.13.10 Accordingly, the parcel prevents 'settlements' from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"to prevent neighbouring towns merging into one another"*.

- 3.13.11 Representations have been submitted for the following areas of land within GB12:

- Guide Dogs for the Blind Site
- Land at Tomswood Hill

- 3.13.12 In addition further minor amendments are proposed for the boundary of Claybury Hospital/Repton Park. These are assessed below at paragraph 3.13.22.

Guide Dogs for the Blind Site

- 3.13.13 In the January 2016 Green Belt review it was noted that the Guide Dogs for the Blind site is privately owned land and could not therefore 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 were used to inform this report's findings.

- 3.13.14 The site was visited with a representative for the Guide Dogs for the Blind Association, on the 7th December 2016. From this visit it was ascertained that the Green Belt boundary did not correspond to any physical features within the site. The part of the site within the Green Belt comprises managed grassland and kennels enclosed by grassed bunds. In addition it comprises an overflow car park. The boundaries of the site to the south are defined by mature woodland within Claybury Park and to the east by mature woodland in Repton Park. The site forms a strong physical link between Green Belt land within these areas.
- 3.13.15 The site's removal from the Green Belt would isolate land to the east of the site from the remainder of the GB12 parcel. As such the site assists in "*safeguarding the countryside from encroachment*". It is therefore recommended for retention within the Green Belt. The current Green Belt boundary is illogical as it cuts across an area of grassland, bearing not relation to readily recognisable features. It is assumed that this boundary related to a field boundary which no longer exists. Guidance within the NPPF states that Green Belt should only be altered in "*exceptional circumstances*". Since amendment to this boundary would provide coherence to Green Belt boundaries which is currently missing, it is considered that such a change would be justified as fulfilling "*exceptional circumstances*".
- 3.13.16 It is therefore recommended that the Green Belt boundary be re-defined within the site so that it corresponds to "*readily recognisable physical features*" e.g. the development footprint of existing buildings, to be compliant with the NPPF. The suggested boundary is shown on drawings ST15916-004, ST15916-005 and ST15916-009 in Appendix 2.

Land at Tomswood Hill

- 3.13.17 This land was previously assessed as site D in the January 2016 report, see drawing ST14395-002 in Appendix 1. This 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. A SINC designation extends from part of the southern part of the site into the wider Green Belt. The site is open, undeveloped and is contiguous with the remainder of the GB12 parcel.

3.13.18 Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of “*to assist in the safeguarding the countryside from encroachment*”.

3.13.19 The site does not prevent sprawl and does not prevent the merging of settlements as it is bounded by development to the north, south and east within the same settlement. To the east Tomswood Hill Road creates a strong physical boundary.

3.13.20 The findings of the 2013 Green Belt Review Addendum and January 2016 review are still valid.

Boundaries of Claybury Hospital/Repton Park

3.13.21 The Mayor’s letter of 11th October 2016 commented on the Claybury Hospital site as follows:-

“Claybury Hospital

This site is partially developed with housing and supporting social infrastructure. Development is relatively low density and appears as a settlement within the Green Belt. To maintain the area’s character it is not considered necessary to alter the Green Belt boundary. Should the boundary be altered, it should be drawn tight around the developed land.”

3.13.22 The boundaries of those areas previously recommended for release from Green Belt within GB12 were generally drawn to clearly defined physical features including access roads and/or the development footprint of existing buildings. However, it should be noted that part of the boundary of the area referred to as GB12b should be redrawn to the development footprint within the gated community of Repton Park, to clearly delineate the boundary of the Green Belt. Guidance within the NPPF states that Green Belt should only be altered in “*exceptional circumstances*”. Since amendment to this boundary would provide coherence to Green Belt boundaries which is currently missing, it is considered that such a change would be justified as fulfilling “*exceptional circumstances*”. This boundary change is shown on drawings ST15916-004, ST15916-005 and ST15916-009 in Appendix 2.

3.13.23 **It is recommended that with the exception of the two areas previously referred to as GB12b and GB12c (see drawing ST14935-004 in Appendix 1) and minor boundary changes, the parcel remains in the Green Belt and that it is not sub-divided further.**

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. 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 in Appendix 1 and is discussed separately below at paragraph 3.14.7.
- 3.14.2 The remainder of GB13 is physically split into two parts by a small industrial estate located along Roebuck Road. The largest section of GB13 is located west of Roebuck Road and is flat and open. Whilst sports fields are present, these form a contiguous part of the larger area of GB13 and GB14. Hedgerows and trees extend along field boundaries and extend at right angles to Forest Road.
- 3.14.3 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.
- 3.14.4 Parts of the parcel are located within a SINC. All of the parcel to the east of the railway line is contiguous with the wider Green Belt and in that regard, it safeguards the countryside from encroachment. Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to assist in the safeguarding the countryside from encroachment”*.
- 3.14.5 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. Accordingly, the parcel fulfils the NPPF purpose of *“to check the unrestricted sprawl of large built-up areas”*.
- 3.14.6 It prevents the merging of settlements as it separates Hainault to the north from Chadwell Heath/Aldborough Hatch/ Newbury Park to the south. It forms a gap between Redbridge, as part of Greater London conurbation, and towns beyond the Borough boundary. Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to prevent neighbouring towns merging into one another”*.

Oakfield (GB13b)

- 3.14.7 GB13b, referred to as Oakfield is subject to a representation submitted on behalf of the Save Oakfields Society, dated September 2016. GB13b does not meet any of the NPPF Green Belt 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 settlements merging into one another as adjacent development is part of Ilford/Barkingside/Grange Hill. The site solely comprises sports/playing fields with associated buildings and extensive car parking. The existing sports centre is very prominent and affects the openness of GB13b. In addition, the site's connection to the wider Green Belt is prevented by the presence of the railway on embankment to the east which forms a strong, well defined boundary consistent with paragraph 85 of the NPPF. The site is thus totally enclosed by development and is not connected to land which could be interpreted as "Countryside". Therefore it does not assist in "safeguarding the countryside from encroachment".
- 3.14.8 The findings of the 2010 and January 2016 Green Belt reviews 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 in Appendix 1). However, it is recommended that the far eastern part comprising of Redbridge Cemetery is re-classified as GB13a (see drawing ST14935-005 in Appendix 1), in order to clarify its visual connection with the western portion of GB13.
- 3.15 **GB14: Fairlop Plain**
- 3.15.1 Representations have been submitted on this parcel in September 2016 by AECOM on behalf of East Thames, in relation to land at Billet Road and the Aldborough Hatch Defence Association.
- 3.15.2 The 2010 Green Belt review suggested that a part of the parcel be released from the Green Belt. 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 in Appendix 1 and is discussed below.
- 3.15.3 In addition the 2016 report identified a potential further area for release from the Green Belt, labelled GB14c on drawing ST14935-004 in Appendix 1.

- 3.15.4 The remainder of 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. Agricultural land predominates with field boundaries within the parcel comprising hedgerows and mature trees.
- 3.15.5 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. Accordingly, the parcel fulfils the NPPF purpose of *“to check the unrestricted sprawl of large built-up areas”*.
- 3.15.6 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. Accordingly, the parcel represents ‘countryside’ and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to assist in the safeguarding the countryside from encroachment”*.
- 3.15.7 It also forms a barrier between the settlements of Hainault to the north from Ilford/Chadwell Heath/Newbury Park to the south, preventing them from merging. Accordingly, the parcel prevents ‘settlements’ from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *“to prevent neighbouring towns merging into one another”*.

King Solomon School (GB14b)

- 3.15.8 The area labelled GB14b comprises the playing fields to the King Solomon High School and Ilford Jewish Primary School. 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 settlements as the surrounding urban development is part of Ilford/Barkingside. 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 which forms a strong, well defined boundary consistent with Paragraph 85 of the NPPF. It is therefore unconnected with any land which may be considered to be *“countryside”*. The site does not therefore safeguard the countryside from encroachment.
- 3.15.9 As a consequence, the site labelled GB14b (see drawing ST14935-004 in Appendix 1) does not meet any national Green Belt purpose and there are no Green Belt reasons why this site may not be released from the Green Belt. It will be a matter for the

Council to consider whether “*exceptional circumstances*” apply to this land, which could justify its removal from the Green Belt.

Land to the South of Billet Road (GB14c)

- 3.15.10 The site labelled GB14c on drawing ST14935-004 in Appendix 1, to the south of Billet Road is flat and comprises scrub land; land for horse grazing; extensive hardstanding and vehicle parking; and sports/playing 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 west; and the A12 to the south.
- 3.15.11 The site is enclosed to the east and west by residential development and the busy A12 to the south. The site is physically connected to the wider Green Belt parcel of GB14 to the north, however the visual connection is reduced by the presence of Hainault House stables, Red House Farm and development further to the west along Billet Road. 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. Accordingly, the parcel does not fulfil the NPPF purpose of “*to check the unrestricted sprawl of large built-up areas*”.
- 3.15.12 It does not prevent the merging of settlements as the settlement of Ilford/Redbridge/Little Heath/Chadwell Heath have existing physical and visual coalescence to the south and east of the site. Accordingly, the site does not prevent ‘settlements’ from coalescing and therefore does not fulfil the NPPF Green Belt purpose of “*to prevent neighbouring towns merging into one another*”.
- 3.15.13 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.
- 3.15.14 Accordingly, the parcel does not represent ‘countryside’ and its retention within the Green Belt does not fulfil the NPPF Green Belt purpose of “*to assist in the safeguarding the countryside from encroachment*”.
- 3.15.15 It is recommended that the entirety of GB14c 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 south of Billet Road is released from the Green Belt.
- 3.15.16 **It is recommended that the areas labelled as GB14b and GB14c** (see drawing ST14935-004 in Appendix 1) do not fulfil Green Belt purposes and that there are no

Green Belt reasons why they may not **be released from the Green Belt. It is recommended that the remainder of GB14 should not be further sub-divided.**

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 SINCE 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 Accordingly, the parcel represents 'countryside' and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"to assist in the safeguarding the countryside from encroachment"*.
- 3.16.3 GB15 Hainault Forest prevents sprawl and prevents the merging of settlements. The parcel is open and is well connected with the wider Metropolitan Green Belt, which prevents urban sprawl from Hainault. Accordingly, the parcel fulfils the NPPF purpose of *"to check the unrestricted sprawl of large built-up areas"*.
- 3.16.4 GB15 prevents Hainault from merging with other settlements outside the Borough. Accordingly, the parcel prevents 'settlements' from coalescing and its retention within the Green Belt fulfils the NPPF Green Belt purpose of *"to prevent neighbouring towns merging into one another"*.
- 3.16.5 The findings of the 2010 and January 2016 Green Belt reviews 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 Representations in September 2016 have been submitted for this parcel on behalf of Barking, Havering and Redbridge (University Hospitals) NHS Trust regarding land at King George Hospital; North East London NHS Foundation Trust (NELFT), in relation to land around Goodmayes Hospital; and on behalf of Ford Motor Company Ltd and Fords Sports and Social Trust in relation to the Ford Sports and Social Club, Newbury Park.
- 3.17.2 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. The September 2015 site assessment reviewed the findings of the 2010 review.

- 3.17.3 GB16 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 western and southern parts of the parcel comprise the Fords Sports Ground; Goodmayes Hospital Sports Ground; Seven Kings Park; and Barley Lane Allotments. The parcel is surrounded by housing on all sides and the hospital site is relatively urbanised.
- 3.17.4 Accordingly, the parcel does not represent 'countryside' and its retention within the Green Belt does not fulfil the NPPF Green Belt purpose of *"to assist in the safeguarding the countryside from encroachment"*.
- 3.17.5 GB16 does not prevent sprawl nor does it prevent the merging of settlements as it is surrounded by development at all sides which comprises the same settlement of Ilford/Newbury Park/Aldborough Heath/Severn Kings/Little Heath.
- 3.17.6 Accordingly, the parcel does not prevent 'settlements' from coalescing and does not fulfil the NPPF Green Belt purpose of *"to prevent neighbouring towns merging into one another"*.
- 3.17.7 In addition, as the parcel is surrounded by urban development on all sides the parcel does not fulfil the NPPF purpose of *"to check the unrestricted sprawl of large built-up areas"*.
- 3.17.8 The findings of the 2010 Green Belt review remain valid. **It is recommended that site GB16** does not fulfil Green Belt purposes and that there are no Green Belt reasons why this land may not **be released from the Green Belt** (see drawings ST14935-004 and 005 in Appendix 1).

4 CONCLUSION

4.1.1 The London Borough of Redbridge is currently preparing their Local Plan 2015 – 2030. As part of this process the Council has undertaken a review of the Borough’s Green Belt. The Council published a Green Belt Review in 2010 and subsequently published an addendum in 2013 and another in 2015. WA were commissioned to undertake a review of these documents and update them where necessary. This review report was published in January 2016. Since then a number of responses have been received during the pre-submission stage of the Local Plan. This Green Belt Review addendum has addressed these responses. In addition, it has provided further clarification on how Green Belt parcels within Redbridge relate to and contribute to the five NPPF Green Belt purposes.

4.1.2 This assessment has concluded that the result of the January 2016 review are correct. All recommendations are also shown visually in drawings ST15916-004 and ST15916-005 with more detail shown on ST15916-006 to ST15916-009 in Appendix 2. These conclusions are illustrated in tabular format below.

Table 1: Recommendations of this Green Belt Review Addendum				
Parcel	Recommended for release	Recommended for sub-division	Recommended boundary amendment(s)	Additional areas recommended for inclusion
GB01				
GB02				
GB03			X	
GB04				X
GB05				
GB06				
GB07				
GB08				
GB09				
GB10				

Table 1: Recommendations of this Green Belt Review Addendum				
Parcel	Recommended for release	Recommended for sub-division	Recommended boundary amendment(s)	Additional areas recommended for inclusion
GB11		X	X	
GB12		X	X	
GB13		X		
GB14		X		
GB15				
GB16	X			

4.1.3 Where Green Belt parcels, or areas within a Green Belt parcel, are considered not to fulfil the NPPF Green Belt purposes, this addendum has provided commentary on the reasoning for the conclusions given.

4.1.4 Additionally, where the boundary of Green Belt parcels do not relate to physical features that are readily recognisable and likely to be permanent, it is thought that these generally relate to mapping errors which have arisen in the past or major changes in land use. These are considered to constitute exceptional circumstances and accordingly amendments to these boundaries have been recommended.

APPENDICES

APPENDIX 1: Drawings from Green Belt Review (January 2016)

APPENDIX 2: Drawings for Green Belt Review Addendum (February 2017)

STOKE-ON-TRENT
Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)178 227 6700

BIRMINGHAM
Two Devon Way
Longbridge Technology Park
Longbridge
Birmingham
B31 2TS
Tel: +44 (0)121 580 0909

CARDIFF
22 Windsor Place
Cardiff
CF10 3BY
Tel: +44 (0)292 072 9191

CROYDON
Melrose House
42 Dingwall Road
Croydon
Surrey
CR0 2NE
Tel: +44 (0)20 8680 7600

CUMBRIA
Cocklakes Yard
Carlisle
Cumbria
CA4 0BQ
Tel: +44 (0)122 856 4820

EDINBURGH
Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GLASGOW
2 West Regent Street
Glasgow
G2 1RW
Tel: +44 (0)141 433 7210

LONDON
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)207 242 3243

MANCHESTER (City Centre)
76 King Street
Manchester
M2 4NH
Tel: +44 (0)161 817 5038

MANCHESTER (Greater)
2 The Avenue
Leigh
Greater Manchester
WN7 1ES
Tel: +44 (0)194 226 0101

NEWCASTLE UPON TYNE
City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0) 191 232 0943

SHEFFIELD
Unit 5 Newton
Business Centre Newton
Chambers Road Thorncliffe
Park Chapeltown
Sheffield
S35 2PH
Tel: +44 (0)114 245 6244

TAUNTON
Victoria House
Victoria Street
Taunton
Somerset
TA1 3JA
Tel: +44 (0)182 370 3100

TRURO
Baldhu House
Wheal Jane Earth
Science Park Baldhu
Truro
TR3 6EH
Tel: +44 (0)187 256 0738

International offices:
ALMATY
29/6 Satpaev Avenue
Regency Hotel Office
Tower Almaty
Kazakhstan
050040
Tel: +7(727) 334 1310

MOSCOW
21/5 Kuznetskiy Most St.
Moscow
Russia
Tel: +7(495) 626 07 67