

**ISSUES/POLICY Nos:**

- (1) Issue 4a/Policy No.LP1B  
Crossrail Corridor sub-issues (iv), (v), (vi).
- (2) Issue 6/Policy LP1B  
Green Belt boundaries sub-issue (v).

**REPRESENTOR:**

David Stephens on behalf of the Seven Kings and Newbury Park Residents Association.

**Representor No. R00411**

## **Hearing statement in respect of Redbridge draft Local Plan 2015-2030**

This statement is supplementary to the letter of representations dated 26 September 2016 from David Stephens, Chairman of the Seven Kings and Newbury Park Residents Association.

**Part of the draft Local Plan considered to be unsound or not legally compliant** – Section 3/Promoting and Managing Growth and in particular the inclusion of the GB16 lands (King George and Goodmayes Hospitals; Ford Sports Ground and Seven Kings park) in Policy Ip1b.

**Which of the soundness criteria does it fail to meet** – (i) Is the plan justified? (ii) Is it based on robust and credible evidence? (iii) Is it the most appropriate strategy when considered against alternatives?

**Why does it fail the criteria:**

1. There has not been a consistent approach in the Green Belt reviews with the authors erroneously ignoring their own tests in some instances to arrive at illogical conclusions.
2. In paragraph 1.1.3 of the Colin Buchanan review 2010 it says that the purpose is to identify land which might not fulfil PPG2. Surely it is a matter of fact whether the land in question satisfies Green Belt requirements?
3. The Colin Buchanan report, in paragraph 2.4.9, list primary and secondary constraints to the development of the land. It is considered that, in the context of a Green Belt review, these constraints should be taken into account when deciding whether the fulfils Green Belt functions. Thus, in the case of the GB16 lands the following ‘constraints’ should be given significant recognition:
  - (i) Part of the land is high risk flood plain for Seven Kings Water;

- (ii) Part of the land is designated as a Site of Nature Conservation Interest;
  - (iii) Seven Kings Park, by its nature, is public open space which also incorporates actively used playing fields;
  - (iv) Ford Sports Ground has actively used playing pitches;
  - (v) Until relatively recently the sports pitched within the grounds of Goodmayes Hospital were actively used;
  - (vi) Part of the Goodmayes Hospital grounds includes the Barley Lane allotments.
4. In Section 3 of the Colin Buchanan review the following Green Belt sites were deemed, from a site based assessment, to assist in safeguarding the countryside from encroachment: Wanstead Flats; Wanstead Park; Woodford Green; Reeds Forest; Knighton Wood; Ray Park; Roding Lane North; Claybury Hospital. But all of these sites are bounded on two or three sides by existing housing and, in some instances, their connection to other parcels of 'countryside', is somewhat tenuous. For example, part of Woodford Green is separated from other lands by the A104. But when the GB16 lands were assessed, the similarities with these other lands were ignored and the conclusion was that GB16 lands did not contribute to safeguarding the 'countryside'. We believe this to be an erroneous conclusion.
  5. In the Wardell-Armstrong review of January 2016, in paragraph 2.2.2, reference is made to the scoring system used in the 2010 Colin Buchanan review and suggests "this may be too crude to fully capture the inter-relationship between performance against all the purposes and local interpretations". This therefore brings into question the validity of the 2010 review conclusions and, because it was not an entirely new review, the conclusions of the 2016 review.
  6. In paragraph 2.3.6, the Wardell-Armstrong review references the four core principles in the NPPF which are of relevance to local issues, noting that there can be multiple benefits from the use of land in urban areas, recognising that some open land can perform many functions (such as wildlife, recreation, flood risk mitigation, carbon storage or food production). These uses can be identified in the GB16 lands but which the Wardell-Armstrong review, and Redbridge Council, seem to have ignored.
  7. Paragraph 2.3.10 of the Wardell-Armstrong review refers to how the NPPF views locally important green open space but then the review does not apply the Local Green Space requirements test to the GB16 lands. There seems little point in quoting sections from the NPPF if those sections are not properly applied in the Green Belt review.
  8. Paragraphs 3.17.2 and 3.17.3 of the Wardell-Armstrong review are contradictory and at odds with the review final conclusions. In 3.17.2 it says the parcel (GB16) is physically and visually unconnected to parcel GB14 due to the presence of the A12. But in paragraph 3.17.3 it says the physical and visual connection to GB14 is weak due to the A12 and the urbanised nature of the hospital site. Either there is a connection or there is not. There is in fact a 600m approximate frontage of the GB16 lands which faces a similar length frontage of the GB14 lands on the opposite side of the A12. The wooded area in GB16, and through which the Blue Ribbon Network Seven Kings Water flows, and which is also a Site of Nature Conservation Interest, is mirrored on the opposite side of the A12 in the GB14 lands. Seven Kings Water

passes through a culvert under the A12. The A12 is not a total barrier between GB16 and GB14 since it can be safely crossed close-by the north-east corner of the GB16 lands by way of an existing footbridge or at the adjacent traffic light controlled junction.

9. It is appropriate to mention that King George was formerly located along Eastern Avenue close to Newbury Park Underground station. The new hospital, built on previously designated green belt land, did not require planning permission because the site is Crown Land. The former hospital site was residentially redeveloped. Thus, green belt land was taken for the construction of the new King George hospital without there being any replacement green belt land. It is considered erroneous for the green belt review to allow the 'special circumstances' of Crown Land development to guide the conclusion that none of the GB16 lands meet Green Belt criteria. Additionally, housing numbers in Redbridge have already benefitted by the use of part of the GB16 lands for the new hospital. Redbridge now wants to have a 'second bite of the cherry'.
10. Paragraph 3.17.3 of the Wardell-Armstrong review also says that the western and southern parts of GB16 can be considered locally important open space, particularly Ford Sports Ground, Goodmayes Hospital sports ground, Seven Kings Park and Barley Lane allotments. The paragraph goes on to say that these spaces help to retain the biodiversity of the area. Somewhat oddly it suggests that if the sites of King George and Goodmayes hospitals (the buildings as opposed to the whole of the surrounding hospital lands) are released from the Green Belt (and one has to question why this is necessary since, being Crown Land, no other non-crown uses can be developed on the land whilst it retains its green belt designation) then the whole of GB16 should be released because the remaining lands would be isolated from GB14. This is an illogical conclusion since, as pointed out above, the link to GB14 remains as it is at present. Also, there has been no 'exceptional circumstance' identified which would justify taking any of the GB16 lands out of green belt.
11. In the draft Local Plan, Redbridge has totally ignored the Wardell-Armstrong conclusion that the western and southern parts of GB16 can be considered 'locally important' open space assisting the retention of biodiversity, and instead wants to take large tracts of the land, disregarding the existing local uses, for housing development. Oddly, Redbridge, proposes that the redevelopment of the Ford Sports Ground should include part of the wooded/flood plain lands adjacent to Seven Kings Water and which is designated as a Site of Nature Conservation Interest.
12. In the London First 2015 report – The Green Belt: A Place for Londoners? – on page 10, it refers to preserving publicly accessible open space of high environmental and amenity value around cities providing treasured public good and that preservation can be justified in terms of the benefits produced for the general population. It goes on to say that research demonstrates that there are substantial benefits from local parks, noting that there is no value for residents in Hackney in protected farmland five kilometres away in Havering. But Redbridge is choosing to ignore this and wants to take away 'locally important' open space whilst continuing to protect, by green belt designation, other lands to which the public in general have little or no access (i.e. farmland and golf courses).

13. On page 20 of the London First report it says “We argue that the starting point for any Green Belt review in London should be to only consider areas that are close to existing or future transport nodes, that are of poor environmental or civic value ...”. Clearly the majority of the GB16 lands are of important environmental and civic value. The Green Belt reviews have not applied to poor environmental or civic value test even though there are green belt lands within a short distance of the GB16 lands which have lesser environmental and civic value.
14. Bizarrely, whilst in Section 3 of the draft Local Plan, Redbridge refers to the King George and Goodmayes Hospitals and The Ford Sports Ground as opportunity sites and has policy boxes for each of those sites, in Section 6, paragraph 6.1.7 (as amended) there is only reference to releasing parcel GB16b from Green Belt as opposed to the whole of GB16. Thus, if paragraph 6.1.7 is correct then Section 3 proposals in respect of The Ford sports Ground are wrong.
15. It is considered that neither the Colin Buchanan nor the Wardell-Armstrong Green Belt reviews have properly demonstrated exceptional circumstances which would justify releasing the GB16 lands from Green Belt designation.

**How can the plan be made sound or legally compliant:**

1. It should be recognised that the Green Belt reviews have not applied the various tests properly, are contradictory and have not shown exceptional circumstances in respect of the GB16 lands and therefore cannot be used to justify the release of the GB16 lands from Green Belt designation.
2. All reference to the removal from the Green Belt the GB16 lands and references to the redevelopment of King George and Goodmayes Hospital lands and The Ford Sports Ground should be deleted from the draft Local Plan.

**Changes to the draft Local Plan being sought:**

1. In Section 3, sub-section 3.4 The Crossrail Corridor Investment and Growth Area, amend Policy LP1B by altering the New Homes number and the Key Infrastructure text to reflect that the GB16 lands are not available for development.
2. Amend paragraph 3.4.7 (as amended) to remove (i) land in and around King George Hospitals; and (ii) The Ford Sports Ground, as key opportunity sites.
3. Amend paragraph 3.4.8 to remove (i) King George and Goodmayes Hospitals; and (ii) The Ford sports Ground policy boxes (as amended) as being part of the Council’s master-planning ambitions.
4. Section 6, paragraph 6.1.6 – delete ‘The Council therefore considers that this demonstrates “exceptional circumstances” to justify a review and adjustment of the borough’s Green Belt boundaries to release additional land to ensure the Council can plan positively to meet the development and growth needs of the borough’.
5. Paragraph 6.1.7 (as amended) – remove reference to King George and Goodmayes Hospital (parcel GB16b).

6. Appendix, Development Opportunity Sites – Crossrail Corridor Investment and Growth Area – Phase 1 (2015-2020) – delete site No. 46 Land in and around King George/Goodmayes Hospitals – deletion is also proposed in the Schedule of Modifications of March 2017.
7. Schedule of Modifications March 2017 - Crossrail Corridor Investment and Growth Area – Phase 2 (2021-2025) – delete the proposed amendment ‘Site No.67 Land in and around King George/Goodmayes Hospitals.
8. Appendix, Development Opportunity Sites – Crossrail Corridor Investment and Growth Area – Phase 2 (2021-2025) as amended by the Schedule of Modifications March 2017 – delete site No.68 The Ford Sports Ground (Phase 1).
9. Appendix, Development Opportunity Sites – Crossrail Corridor Investment and Growth Area – Phase 3 (2026-2030) as amended by the Schedule of Modifications March 2017 – delete site No.68 The Ford Sports Ground (Phase 2).

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**Statement prepared by:**

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9 May 2017