

CED013 Council's Response to Issue 6

Issue 6

Are there exceptional circumstances that warrant altering Green Belt boundaries?

As set out in response to questions (i) – (xi) below, the Council maintains that there are exceptional circumstances that warrant altering Green Belt boundaries.

(i) Having regard to the NPPF, the housing targets in The London Plan, the policy approach of supporting growth without encroaching on the Green Belt, the identification of Green Belt in the London SHLA as a policy constraint (paragraph 2.40 of LBR 2.05) and the objectively assessed need for housing in the Borough should Green Belt sites be released for development as a matter of principle?

- 1.1 Having regard to each of the above points, the Council maintains that as a matter of principle, it is acceptable to release land from the Green Belt through the Local Plan. Doing so is necessary to meet the boroughs development needs, which represent exceptional circumstances. This is consistent with paragraph 83 of the NPPF, which states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."
- 1.2 Whilst the broad policy approach in both the NPPF and the London Plan is to support growth without encroaching onto the Green Belt, neither rules out amending Green Belt boundaries through a Local Plan where exceptional circumstances exist.
- 1.3 The London Plan housing target for the borough is a minimum of 1,123 dwellings per annum, or 16,845 over the plan period. The London SHLA demonstrates that this target cannot be met in the borough through brownfield land alone. Whilst the London SHLA recognises Green Belt as a policy constraint, it did still assign 100% probability to Oakfield, Ford Sports Ground, and King George and Goodmayes Hospitals coming forward for housing development – so the London Plan housing target has effectively factored in some Green Belt release in the borough.
- 1.4 More recent evidence of housing need in the borough, the North East London SHMA (LBR2.01), demonstrates a much higher Objectively Assessed Need for new housing in the borough now exists than originally anticipated when the London Plan was produced. Document LBR2.01 identified levels of housing need in the borough of 31,977. More recent updates to this (see CED003 SHMA Update) demonstrate that since the SHMA was published, the borough's Objectively Assessed Need for new housing has risen further to 34,300. As the London SHLA demonstrates brownfield land capacity of less than 16,845, the borough therefore has exceptional circumstances for altering Green Belt boundaries. Doing so is necessary not only to meet London Plan minimum targets, but also to close the gap on the borough's full Objectively Assessed Need for housing.

(ii) Did the SHLA identify Green Belt sites as having “significant housing capacity” as indicated at paragraph 4.8 of the Spatial Strategy Topic Paper (LBR 1.04)?

- 2.1 Yes. Land at Ford Sports Ground, King George and Goodmayes Hospitals, and Oakfield, were all assigned 100% probability as housing sites in the SHLA, despite their Green Belt designation.
- 2.2 King George and Goodmayes Hospitals, and Ford Sports Ground (SHLA site references 1326128, 1326128, and 1326183) were assigned a total capacity of 1051 homes with 100% probability of coming forward. Oakfield meanwhile (SHLA site reference 1326168), was assigned a capacity of 899 homes with 100% probability of coming forward. In total, the London SHLA therefore identified a housing capacity in the borough of 1,950 homes on Green Belt sites.

(iii) How would the release of Green Belt sites promote sustainable patterns of development?

- 3.1 The proposed release of Green Belt sites as set out in the Local Plan is considered to promote a sustainable pattern of development in the borough, and is supported by the Sustainability Appraisal 2017 (LBR 1.1.12). The targeted release of Green Belt sites was identified in this document as performing better than alternative strategies of nil Green Belt release, or higher levels of Green Belt release. This appraisal predicted no significant negative impacts of targeted Green Belt release, and one significant positive effect in terms of education provision.
- 3.2 All sites proposed for release are in sustainable locations within Investment and Growth Areas. The sustainability credentials of each site proposed for release, and how they can promote a sustainable pattern of development, are set out in detail in response to answer 4a(iii) on the Crossrail Corridor, and 4a(xi) and (xii) on Oakfield. These include matters such as proximity to town centres and local amenities, scope for improved permeability through sites, provision of publically accessible open space and education uses on site, and scope for a mix of housing types and tenures.
- 3.3 In addition, all sites proposed for release from Green Belt are well places to promote sustainable patterns of development due to their relative proximity to public transport hubs with the greatest capacity for additional passengers.
- 3.4 Sites in the Crossrail Corridor will all be better served than alternative Green Belt parcels by enhanced capacity at Seven Kings, Goodmayes, and Chadwell Heath Crossrail stations. Meanwhile Oakfield, and to a lesser extent Ford Sports Ground, are served by stations on the Hainault Loop branch of the Central Line (i.e. Fairlop and Newbury Park), which TfL train

loading data (<http://crowding.data.tfl.gov.uk>) demonstrates is less prone to overcrowding issues than stations in the west of the borough.

- 3.5 The only other Green Belt parcels that offer similar locational benefits to those proposed for release, (i.e. GB02 Wanstead Park - near Ilford Station, and GB14 Fairlop Plain - near Fairlop and Barkingside Stations) have been determined as meeting Green Belt purposes through the 2016 Green Belt Review (LBR2.41) and the 2017 Green Belt Addendum (LBR2.41.1). As such they cannot be considered to promote a sustainable pattern of development.

(iv) Paragraph 4.31 of the Spatial Strategy Topic Paper (LBR 1.04) observes that without the release of Green Belt sites the Council would not be able to meet its infrastructure needs. What weight should be given to this consideration in determining whether exceptional circumstances exist?

- 4.1 Significant weight should be given to infrastructure needs in determining if exceptional circumstances exist for Green Belt release.
- 4.2 The NPPF sets out that a presumption in favour of sustainable development is at the heart of the UK planning system, and in its explanation of the term emphasises the importance of planning's social role. Specific mention is made at paragraph 7 of the NPPF for "accessible local services that reflect the community's needs and support its health, social and cultural wellbeing." Education and health facilities are clearly important in this respect.
- 4.3 The NPPF is also clear that boroughs should plan for development needs that go beyond housing needs. Paragraph 17 states that "every effort should be made objectively to identify and then meet the housing, business and other development needs of an area", whilst paragraph 157 goes on to state that Local Plans should "plan positively for the development and infrastructure required in the area". Paragraph 182 meanwhile embeds infrastructure requirements into one of the tests of soundness for Local Plans. This states that for plans to be "positively prepared" they should "be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements".
- 4.4 There are therefore two aspects to the borough's development needs that both independently and collectively amount to exceptional circumstances. These are:
- a) The need to deliver homes to meet minimum London Plan housing targets and close the gap on Objectively Assessed Need for housing;
 - b) Infrastructure requirements to meet the needs of both existing and future population.
- 4.5 Regarding infrastructure requirements, the need for Green Belt sites primarily relates to future education provision in the borough. As set out in the Infrastructure Delivery Plan (LBR2.21), whilst an extensive school

expansion plan is already underway, this is not sufficient to meet projected future demand for school places, and sites for new schools will also be needed. Given that insufficient brownfield land can be found in the borough to meet housing targets, it also follows that insufficient land can be identified for new schools, which by their nature require a significant building footprint and access to playing fields (applying Education Funding Agency guidelines for mainstream schools-BB103), and should be provided in accessible locations close to areas of population growth. To date, there has been interest from two approved free-school providers in the borough, who are working with the Education Funding Agency to secure sites in Redbridge, whilst further interest has also been expressed from another two free-school providers.

(v) Is the methodology within the Green Belt Review Addendum (LBR 2.41.1) and the previous reviews robust and are its conclusions logical? In particular, is the interpretation of what is meant by “town” and “countryside” in this context reasonable? Have these terms been applied consistently?

- 5.1 Through the preparation of the Local Plan, several Green Belt Assessments have been conducted. An initial assessment of all Green Belt in the borough against PPG2 purposes was carried out in 2010. This was then supplemented with additional assessments in 2013 and 2015 of sites that had been subject to representations through Local Plan consultations. All findings were then collated and updated with a comprehensive review of all Green Belt against NPPF purposes in the 2016 Green Belt Review (LBR2.41).
- 5.2 The Green Belt Review Addendum (LBR2.41.1) further clarifies the performance of all Green Belt parcels in the borough, ensuring site assessments and conclusions reached are fully grounded in NPPF Green Belt purposes. It also responds to representations received on the Pre-Submission Plan. Its methodology is considered robust, and its conclusions logical.
- 5.3 Each Green Belt parcel within the borough has been consistently assessed against the following NPPF Green Belt purposes:
- 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
- 5.4 No assessment has been made regarding the setting and special character of historic towns, or the Green Belts role in assisting urban regeneration. This is because:
- Redbridge contains no “historic towns” as applied to national Green Belt policy, and the Green Belt does not operate to preserve the setting and special character of any areas of settlement in the Borough in a way that contributes to their historic significance, and;
 - all brownfield sites offering reasonable prospects of development have been identified as Development Opportunity Sites in the Local Plan.

- 5.5 Whilst the Green Belt Review Addendum (LBR2.41.1) has sought to move away from local interpretations of Green Belt purposes used in part in the earlier reviews, it has been necessary to provide some local interpretation of the term "town" in assessing if parcels prevent neighbouring towns from merging, and "countryside" in assessing if parcels assist in safeguarding the countryside from encroachment. These interpretations have been applied consistently across all Green Belt parcels.
- 5.6 The local interpretation of "town" is necessary due to the pattern of development in London whereby individual and distinct settlements within the Greater London area are separated by Green Belt e.g. Woodford and Walthamstow. A literal translation of the term, which instead focusses solely on separating the urban area of Greater London from nearby towns such as Epping or Brentwood, would fail to recognise this important function of the Green Belt in the London context.
- 5.7 Similarly, within the urbanised environment of London, areas of Green Belt are often used for Green Belt compatible uses such as sports pitches, amenity greenspace, allotments, cemeteries and grazing horses. Where such areas are contiguous with wider countryside – such as grassland, wood or scrubland, they have been interpreted as forming part of the countryside since they function as one with that wider countryside beyond, and make an important contribution to its spaciousness and open character. An example of this is parcel GB10: Roding Lane North, which itself is predominantly used as sports facilities and allotments, but is contiguous with wider countryside in the Roding Valley Park (parcel GB09). Excluding such areas where they are contiguous with and are perceived together with wider countryside would fail to recognise an important quality and function of existing Green Belt within the London conurbation.

(vi) What would be the impact of the proposed housing sites on the Green Belt in terms of its aims and purposes?

- 6.1 The NPPF sets out that the "fundamental aim of Green Belt policy is to prevent urban sprawl" (paragraph 79), and that its purposes are to:
- "check the unrestricted sprawl of large built-up areas;
 - prevent neighbouring towns merging into one another;
 - assist in safeguarding the countryside from encroachment;
 - preserve the setting and special character of historic towns; and
 - assist in urban regeneration, by encouraging the recycling of derelict and other urban land." (paragraph 80)
- 6.2 Only sites determined not to meet any Green Belt purposes, as assessed through the Green Belt Review Addendum (LBR2.41.1), are proposed for development for housing and other uses. Where sites are proposed for release from Green Belt, clearly defined boundaries to the area of release have been identified.

6.3 All sites identified as meeting any Green Belt purposes remain protected by the designation. Proposed development for housing would therefore have no impact on the wider aims and purposes of the Green Belt. Instead:

- remaining protected Green Belt would check unrestricted sprawl and prevent neighbouring towns or settlements merging;
- any development would not represent encroachment onto the countryside as none of the proposed release sites are deemed to represent countryside;
- the setting and special character of historic towns would be unaffected, since none exist in the borough, and the Green Belt does not preserve the setting and special character of settlements in a way that contributes to their historic significance; and
- urban regeneration efforts would not be undermined, as all brownfield sites offering reasonable prospects for development have also been identified as Development Opportunity Sites in the Local Plan.

6.4 Taking each of the proposed housing sites in turn:

Oakfield

6.5 Development will not harm the character or function of the remaining Green Belt to the east, which will remain open countryside that provides a break between the settlements of Hainault to the north and Aldborough Hatch/ Newbury Park/ Seven Kings/ Goodmayes/ Little Heath to the south, Barkingside to the west and Colliers Row beyond the borough boundary to the east. The railway embankment provides physical separation from remaining Green Belt, whilst detailed proposals will require a landscaping strategy and design that responds to the setting of the site adjacent open land.

King George and Goodmayes Hospital, and Ford Sports Ground

6.6 Development will not harm the character or function of the remaining Green Belt to the north, which will remain open countryside that provides a break between the settlements of Hainault to the north and Aldborough Hatch/ Newbury Park/ Seven Kings/ Goodmayes/ Little Heath to the south, and Barkingside to the west and Colliers Row beyond the borough boundary to the east. Where land does adjoin remaining Green Belt to the north (i.e. at King George Hospital), the A12 already provides significant severance.

Land South of Billet Road

6.7 Development will not harm the character or function of the remaining Green Belt to the north, which will remain open countryside that provides a break between the settlements of Little Heath to the south and Hainault, and Barkingside to the west and Colliers Row beyond the borough boundary to the east. Billet Road and Hainault Road provide physical separation from retained Green Belt, whilst detailed proposals will require

a landscaping strategy and design that responds to the setting of the site adjacent open land.

(vii) To what extent should the provisions of paragraph 81 of the NPPF regarding planning positively to enhance the beneficial use of the Green Belt be taken into account?

- 7.1 The provisions in paragraph 81 of the NPPF that once defined, the beneficial use of the Green Belt should be positively planned for, is an important consideration in Redbridge given the extent of Green Belt proposed for retention through the Local Plan. Paragraph 81 is however directed at the use of land which is designated as Green Belt, and does not therefore inform the issue as to whether exceptional circumstances exist to justify release of land from the Green Belt by modification of Green Belt boundaries.
- 7.2 The following policies of the submitted Redbridge Local Plan are relevant to the objectives set out in paragraph 81 of the NPPF:
- a) Policy LP34 – Managing and Protecting the Borough’s Green Belt and Metropolitan Open Land, which provides general support for development that improves access and sport and recreational use of the Green Belt without compromising its openness. Specific reference is made to opportunities for enhanced recreational use of Fairlop Waters.
 - b) Policy LP37 – Green Infrastructure and Blue Ribbon Network, which provides further policy support for increased access and recreational use of the borough’s open spaces, including Green Belt. Specific reference is made to working with adjoining boroughs to improve linkages to regionally significant open spaces such as Epping Forest, Fairlop Country Park, Hainault Country Park, and the Roding Valley; all of which form part of the Green Belt.
- 7.3 In addition, the Council would draw attention to its proposals to re-locate sports pitches from Oakfield and Ford Sports Ground to a suitable location within the borough before the sites are developed. This is set out in both Policy LP35 – Protecting and Enhancing Open Spaces, and the policy boxes for Oakfield (page 36) and Ford Sports Ground (page 28). With specific reference to Oakfield, Hainault and Forest Road Recreation Ground, which is proposed for retention as Green Belt in the Local Plan, has been identified as a potential location for the re-provision of pitches and facilities. Proposed modifications to the proposals map (see Policy Map Modification - document LBR1.02) seek to safeguard the site for replacement sports fields and facilities. Investment in new and improved sports provision on this site would therefore be consistent with NPPF paragraph 81 requirements that “opportunities to provide access; to provide opportunities for outdoor sport...and to improve damaged and derelict land” are sought.

(viii) Are there any sites where land has been included in the Green Belt which it is unnecessary to keep permanently open?

- 8.1 The Council considers that it is necessary to keep open all land that is designated as Green Belt in the Local Plan. Doing so will ensure conformity the fundamental aim of NPPF Green Belt policy which is to “prevent sprawl by keeping land permanently open” (NPPF paragraph 79).
- 8.2 It is acknowledged that some sites have been put forward for development by landowners that the Council contests should be kept permanently open. In each of these cases, the sites put forward have been assessed and identified as meeting at least one NPPF Green Belt purpose in the Green Belt Addendum (LBR2.41.1)

Land at Roding Lane South (part of GB11)

- 8.3 As set out in paragraphs 3.12.7 – 3.12.8 of the Green Belt Review Addendum (LBR2.41.1), land at Roding Lane South comprises grazed fields, semi-natural woodland and scrub, and therefore represents countryside. It is also physically and visually connected to land with similar characteristics to the north and south on the opposite banks of the River Roding, and also land to the immediate south that is connected to the wider Green Belt. Land is therefore necessary to keep permanently open “to assist in the safeguarding the countryside from encroachment.”

Guide Dogs for the Blind Site (part of GB12)

- 8.4 As set out in paragraphs 3.13.14 – 3.13.15 of the Green Belt Review Addendum (LBR2.41.1), The Guide Dogs for the Blind site includes managed grassland and kennels enclosed by grass bunds and forms a strong physical link to mature woodland within Claybury Park and Repton Park (both designated as Green Belt). Development of the site would isolate remaining Green Belt land at Repton Park from Claybury Park; thus making it vulnerable to further development pressure. It is therefore necessary to keep land permanently open to assist in “safeguarding the countryside from encroachment”.

Land at Tomswood Hill (part of GB12)

- 8.5 As set out in paragraphs 3.13.17 – 3.13.18 of the Green Belt Review Addendum (LBR2.41.1), land at Tomswood Hill comprises grassland and parkland, and is open, undeveloped, and contiguous with the wider Green Belt. It therefore represents countryside and should remain open to “assist in safeguarding the countryside from encroachment”.

Bancroft’s School (part of GB08)

- 8.6 As set out in paragraph 3.9.7 of the Green Belt Review Addendum (LBR2.41.1), land at Bancroft’s School comprises playing fields and is contiguous with the wider countryside designated as Green Belt at Ray

Park. It should therefore remain open “to assist in safeguarding the countryside from encroachment”.

(ix) Are the proposed minor boundary changes and additions to the Green Belt justified by exceptional circumstances?

9.1 All proposed minor boundary changes and additions to the Green Belt are justified by exceptional circumstances, as documented in the Green Belt Addendum (LBR2.41.1). In most cases these relate to historical mapping errors and instances where the existing boundary does not relate to readily recognisable physical features.

GB03b

9.2 As set out in paragraphs 3.4.6 – 3.4.7 of the Green Belt Review Addendum (LBR2.41.1), the proposed deletion GB03b (shown visually on map ST15916-006 in Appendix 2 of that document) corrects historical mapping errors whereby the previous boundary cut across a playing field and did not relate to readily recognisable physical features. The proposed boundaries, which follow some grey palisade fencing along the playing field boundary, provides coherence to Green Belt boundaries that is currently missing.

GB04a

9.3 As set out in paragraphs 3.5.5 – 3.5.6 of the Green Belt Review Addendum (LBR2.41.1), the proposed addition GB04a (shown on map ST15916-007 in Appendix 2 of that document) addresses historical errors whereby the sites connection to Green Belt to the east (parcel GB04), north west (parcel GB05), and west (land in Waltham Forest) appears to have been overlooked. The boundaries to the addition are enclosed by urbanised areas to the north and south and as such use “physical features that are readily recognisable and likely to be permanent”.

GB11c

9.4 As set out in paragraph 3.12.3 of the Green Belt Review Addendum (LBR2.41.1), the proposed deletion GB11c (shown on map ST15916-008 in Appendix 2 of that document) represents land that has been built on since the Green Belt was designated in this area, and now relates strongly to urban and residential development to the east. It no longer meets any Green Belt purposes and there is no longer any justification, nor would it be sound, to retain this land within the Green Belt designation. A substantial material change in circumstances has therefore arisen since the Green Belt was designated which amounts to an exceptional circumstance to justify modification of the Green Belt boundary to exclude this developed land. Roding Lane South provides a clear and recognisable physical boundary from land retained as Green Belt to the west.

GB12b-d

9.5 As set out in paragraphs 3.13.3 - 3.13.5 of the Green Belt Review Addendum (LBR2.41.1), land at parcels GB12b, GB12c, and GB12d (shown on map ST15916-009 in Appendix 2 of that document) all represent land that has been built on. For the same reasons as arise in respect of proposed deletion GB11c, they should now be excluded from the Green Belt.

GB12e-f

9.6 As set out in paragraphs 3.13.15 - 3.13.16 of the Green Belt Review Addendum (LBR2.41.1), proposed deletion GB12e and addition GB12f (shown on map ST15916-009 in Appendix 2 of that document) are necessary as the current Green Belt boundary for the site is illogical. The existing boundary cuts across an area of grassland, bearing no relation to readily recognisable features. It therefore either represents a historical mapping error, or related to a field boundary that no longer exists. The proposed boundaries provide coherence to Green Belt boundaries that is currently missing by corresponding to the development footprint of existing buildings, which represents "readily recognisable physical features".

(x) Is the Council satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period?

- 10.1 The Council is satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period.
- 10.2 Proposals in the Local Plan seek to meet the borough's development and infrastructure needs, in a sustainable manner, without compromising the overall function of the Green Belt. All sites that do not currently meet national Green Belt purposes, as informed by the Green Belt Review Addendum (LBR2.41.1), have been proposed for Green Belt release, and clear physical boundaries to the extent of release defined.
- 10.3 Given the borough's challenging development pressures, in particular the objectively assessed housing needs as defined in the North East London SHMA (LB2.01) and the SHMA update (CED003), the 2017 Sustainability Appraisal supporting the Local Plan (LBR1.11.2) explored alternative development strategies, including additional Green Belt release. This however concluded that further Green Belt release (option 4) scored poorer against sustainability objectives than other development strategies - in particular in terms of impact on landscapes/ townscapes, biodiversity, traffic, and transport. It could not therefore be deemed "the most appropriate strategy, when considered against the reasonable alternatives" (NPPF paragraph 182).

10.4 The Council considers that the Local Plan does all that it reasonably can in terms of Green Belt release to meet its challenging development needs in a sustainable manner that conforms with current national and London Plan policy. If there is a change in national or London Plan Green Belt policy in the intervening period so as to require or provide a justification for further release of Green Belt land, the Council considers that further boundary alterations at the end of the plan period will be justifiable. Furthermore, the proposed minor changes to Green Belt boundaries addressed in response to question (ix) above are intended to address anomalies and to ensure that Green Belt boundaries are robust and fit for purpose into the future.

(xi) Have the proposed boundaries been defined clearly, using physical features that are readily recognisable and likely to be permanent?

11.1 Green Belt boundaries have been defined clearly, using readily recognisable physical features that are likely to be permanent; such as roads, fences, building footprints, and railway embankments. The rationale for this is set out in the Green Belt Addendum (LBR2.41.1). Taking each of the proposed boundary alterations in turn:

Snaresbrook Crown Court and Walthamstow Forest (GB03b)

11.2 As set out in paragraph 3.4.6 – 3.4.7 of the Green Belt Review Addendum (LBR2.41.1), re-aligning the northern boundary of GB03 to follow the line of the grey palisade fencing that delineates the school's playing field provides a permanent physical boundary that is currently missing due to historical mapping errors.

Woodford Green (GB04a)

11.3 Proposed boundaries to addition GB04a are aligned to the boundary of Links Road to the north, and the perimeter of existing properties to the south; both of which represent physical features that are readily recognisable and likely to be permanent. The site links to existing retained Green Belt to east and west.

Roding Hospital (GB11)

11.4 As set out in paragraph 3.12.6 of the Green Belt Review Addendum (LBR2.41.1), Roding Lane South provides a strong and logical barrier to the amended Green Belt that relates to permanent physical features. In addition, the fence to the south of Spire Roding Hospital provides clear definition from more urbanised land to the north of retained Green Belt.

11.5 In contrast, alternative boundaries proposed on behalf of Todcharm Ltd in representation R01083 (i.e. a low wooded ridge of topography/ bunding to the east of the River Roding) are considered less well defined, and would not draw a distinction between areas of different character.

Claybury Hospital (GB12)

11.6 As set out in paragraph 3.13.22 of the Green Belt Review Addendum (LBR 2.41.1), proposed boundaries to GB12 have been drawn tightly around the built up area of the Repton Park development (GB12b). Similarly, amendments to GB12c and GB12d also align with building footprint and access roads of existing developed areas. In doing so, they strongly relate to physical features that are readily recognisable and likely to be permanent.

Guide Dogs for the Blind Site (part of GB12)

11.7 As set out in paragraphs 3.13.15 – 3.13.16 of the Green Belt Review Addendum (LBR2.41.1), proposed deletion GB12e and addition GB12f ensure Green Belt boundaries relate to the development footprint of existing buildings, and therefore readily recognisable physical features.

Oakfield (GB13b)

11.8 As set out in paragraphs 3.14.7 and 3.15.8 of the Green Belt Review Addendum (LBR2.41.1), the Central Line railway embankment provides a strong, well defined boundary between land retained as Green Belt at Hainault Fields (GB13) and Fairlop Plain (GB14), and land proposed for release at Oakfield (GB13b). The proposed site for release is surrounded by urban development on all other boundaries.

Land South of Billet Road (GB14c)

11.9 Paragraph 3.15.15 of the Green Belt Review Addendum (LBR2.41.1) recommends the use of Billet Road and Hainault Road as strong, well defined boundaries between retained Green Belt at Fairlop Plain (GB14) and land proposed for release at Land South of Billet Road (GB14c). The site proposed for release is bounded by development to the east and south.

King George and Goodmayes Hospital and Ford Sports Ground (GB16b)

11.10 The A12 provides a strong, well defined boundary between retained Green Belt at Fairlop Plain and land proposed for release at King George and Goodmayes Hospital and Ford Sports Ground. Again, areas proposed for release are surrounded by urban development on all other boundaries.