

COUNCIL SECOND SUPPLEMENTARY AGENDA

19 November 2025

The following report is attached for consideration and is submitted with the agreement of the Chairman as an urgent matter pursuant to Section 100B (4) of the Local Government Act 1972

7 RECOMMENDATIONS AND REPORTS (Pages 3 - 16)

NOTE: The deadline for amendments is midnight, Monday 17 November 2025.

- A. To consider a report of the Chief Executive on a resolution to extend the six month attendance rule (attached);
- B. To consider the report of Cabinet on the East London Joint Waste Plan (attached);

Note: The appendices to the report can be accessed via [this link](#)

- C. To consider a report of Cabinet on Zane's Law (attached);

Council is requested to agree the recommendation as shown in the attached report that was agreed by Cabinet at its meeting on 12 November.

- D. **To consider any other report or motion presented pursuant to Council Procedure Rule 2(h).**

**Zena Smith
Head of Committee & Election
Services**

This page is intentionally left blank

CABINET

12 November 2025

Subject Heading:

Zane's Law

Cabinet Member:

Cllr. Ray Morgon, Leader of the Council

ELT Lead:

Helen Oakerbee, Director of Planning and Public Protection

Report Author and contact details:

Ron Belgrave ron.belgrave@havering.gov.uk

Policy context:

Public Protection and Public Health.

Proposed legislation to require local/national authority action and prevent local harm from legacy or current waste disposal sites (whether licensed or illegal).

Financial summary:

There are no direct costs associated with expressing support for the introduction of "Zane's Law" but full funding would be required (from Government) for the Council to properly deliver on any new or reinvigorated existing obligations from the proposed future legislation.

Is this a Key Decision?

No.

When should this matter be reviewed?

November 2026

Reviewing OSC:

Place Overview & Scrutiny Committee

This subject matter of this report deals with the following Council Objectives:

People – Supporting our residents to stay safe and well.

Place – A great place to live, work and enjoy. ✓

Resources – Enabling a resident-focused and resilient Council.

REPORT SUMMARY

Summary

Following the death, in 2014, of seven-year-old Zane Gbangbola – and the paralysing of his father Kye – allegedly due to pollutants/contamination after the flooding of a nearby “legacy” landfill in Surrey, a campaign (known as “Zane’s Law”) was launched. The campaign seeks to encourage the Government to “make toxic landfills safe” by strengthening statutory requirements and providing the requisite funding for relevant authorities (including councils) to be able to address the issues.

Zane’s Law seeks, in brief, to achieve:

- Councils to maintain a local public Register of Land that may be contaminated.
- Environment Agency to maintain a national public Register of Contaminated Land.
- Councils to inspect any land on the Register and to pursue remediation of land that poses harm.
- Councils to inspect previously closed (“legacy”) landfill sites and to pursue remediation of land that poses a risk of significant harm.
- Government to fully fund councils to conduct the above actions (costs recovered from polluter, as appropriate).

A number of councils (particularly in Surrey and London) and the Greater London Authority have expressed support for Zane’s Law.

It is proposed that, in seeking to keep local residents safe and to reduce the risks of harm, Havering Council supports the principles of “Zane’s Law”.

RECOMMENDATIONS

Cabinet Members are asked to:

- Express support for achieving the principles of Zane’s Law and agree to lobby the Government for its introduction

REPORT DETAIL

1. Background

- 1.1 The Gbangbola family lived in a house in Chertsey, Surrey on a road which is parallel to the River Thames and which is next to a former (“legacy”) landfill site then owned by Brett Aggregates (that, in 2014, contained a lake). The house had a “flood basement” underground.
- 1.2 The landfill site is known as the Lavenders Landfill which was a former gravel pit that was filled with waste in the 1960s before being turned into a lake.
- 1.3 With river catchments already saturated at the beginning of December 2013 and sustained heavy rain during that winter (including 250% of the long term average rainfall in both January and February), the River Thames burst its banks in Surrey in February 2014 resulting in around 1,000 homes being flooded and 600 properties being evacuated.
- 1.4 The volume of flooding in the Chertsey area in January and February 2014 meant that the landfill lake also overflowed and that flow was from the landfill towards the house. As a result the flood basement became filled with water but the house living space was not flooded.
- 1.5 The three members of the family (father [Kye], mother [Natalie], child [Zane]) subsequently became unwell in late January and there was illness through to 7th February.
- 1.6 On 7th February the mother was prescribed anti-biotics during the day and in the early hours of 8th February the father was hospitalised and the son was pronounced dead.
- 1.7 An inquest was opened into Zane’s death and, in September 2016, the coroner concluded that it was an accidental death due to Carbon Monoxide Toxicity as a result of a defective petrol pump used to clear water from the flood basement.
- 1.8 Zane’s parents dispute the coroner’s findings and say that the pump was not in operation at the time and that the Fire Brigade did not detect Carbon Monoxide in the house but did detect Hydrogen Cyanide in the air.
- 1.9 The family believe that their son died from toxic Hydrogen Cyanide (HCN) gas released through the flooding from the nearby legacy landfill. They also believe that HCN is the cause of the paralysing injuries to Zane’s father.

2. Zane's Law Campaign

- 2.1 Following the coroner's public report, the family embarked on a "campaign" to promote the "truth about Zane" and to seek changes in legislation/regulations to strengthen controls around potential pollution and contamination from legacy landfill sites and other sites of concern. These proposed changes have been dubbed as "Zane's Law".
- 2.2 The campaign takes the view that some of the rigours and provisions of the 1990 Environmental Protection Act have been eroded over the years and that Britain is no longer "aligned with global best practice for the proper protection of communities from hazardous land".
- 2.3 According to the campaign website, Zane's Law proposes that the following measures be pursued:
- a) Every local authority must keep a full, regularly updated Register of Land that may be contaminated within their boundary.
 - b) The Environment Agency must keep a full, public National Register of Contaminated Land to be regularly updated by information from local authorities.
 - c) The Registers of Land must be accessible and available for inspection by the general public. Relevant local authorities must fully inspect any land registered that may be contaminated and must fully remediate or enforce remediation of any land which poses harm to public safety or which pollutes controlled waters.
 - d) Relevant local authorities must be responsible for inspecting previously closed landfill sites and fully remediating them, or enforcing their remediation, when they pose a risk of significant harm to people or controlled waters.
 - e) The Government must take full responsibility for providing the necessary funds for local authorities to meet these new requirements, following the 'polluter pays' principle: to recover costs as appropriate where those responsible for the pollution can be identified.
- 2.4 Their website also states that support for Zane's Law has been received from Lewes District Council, Brighton & Hove City Council, Adur District Council and Stroud District Council as well as the London Assembly (Greater London Authority) and the London Borough of Newham.
- 2.5 A summit was also held in the Houses of Parliament in June 2025.

- 2.6 The campaign also claims that, in recent years, regulatory opportunities to protect the public from “toxic waste” have been missed and the laws around landfill have been “dangerously weakened”.

3 Havering Context

Arnold’s Field (Launders Lane)

- 3.1 The most high profile legacy landfill site in Havering is Arnold’s Field in Launders Lane, Rainham. However, the issues there are not the same as the Lavenders Landfill in Chertsey as testing has not indicated any water-borne contaminant leakage from Arnold’s Field.
- 3.2 The issue at Arnold’s Field is more associated with smoke-borne pollutants through the air.
- 3.3 In addition, whilst the soil investigation conducted in 2023 was not able to test as deep as the underlying landfill, it is likely that the majority of the fires at the site are not due to material in the legal legacy landfill but due to the substantive amounts of waste unlawfully deposited on top.
- 3.4 A key further difference is that, unlike Lavenders Landfill, Arnold’s Field has now been formally identified as a “contaminated land” site under Part 2A of the 1990 Environmental Protection Act.

Landfill Sites Across the Borough

- 3.5 The Environment Agency (EA) has identified 14 sites across the borough as licensed landfills. Eleven of those are listed as “live” and three are closed (but still undergo formal EA “aftercare” and monitoring). The information from the EA is:

SITE & ADDRESS	OPERATOR	STATUS	TYPE *
Ayletts Farm Quarry, Warwick lane, RM13 9XW	Ingrebourne Valley Ltd	Closed	Non-Hazardous Landfill
Cockhide Farm Quarry, South Ockenden, RM15 4XJ	Ingrebourne Valley Ltd	Live	Deposit for Recovery
Gerpins Lane, Upminster, RM14 2XR	Havering Council	Closed	Inert Landfill
Pinch Restoration, Gerpins Lane, RM13 2XR	Ingrebourne Valley Ltd	Live	Deposit for Recovery
Rainham Generation Plant, Coldharbour Lane, RM13 9BJ	EDL (UK) LFG Gen. Ltd	Live	Landfill Gas Combustion
Rainham Landfill, Coldharbour Lane, RM13 9BJ	Veolia ES Ltd.	Live	Non-Hazardous Landfill
East Hall Farm, New Road, Rainham, RM13 9DS	Brett Aggregates Ltd	Live	Inert Landfill

SITE & ADDRESS	OPERATOR	STATUS	TYPE *
Baldwins Farm, Bramble Lane, Thurrock, RM15 5SD	Tarmac Aggregates Ltd	Closed	Inert Landfill
Ingrebourne Links, New Road, Rainham Road, RM13 9ED	Ingrebourne Valley Ltd	Live	Deposit for Recovery
Wennington Quarry, New Road, Rainham Road, RM13 9EE	Ingrebourne Valley Ltd	Live	Inert Landfill
Silt Lagoons, Marshes, Coldharbour Lane, RM13 9BJ	Land & Water Remediation Ltd.	Live	Non-Hazardous Landfill
South Hall Farm, New Road, Rainham, RM13 9EW	Havering Aggregates	Live	Inert Landfill
M25 Jct. 28 Improvements, Grove Farm, Brentwood, CM14 5NG	John Graham Const. Ltd	Live	Deposit for Recovery
Mardyke Farm, Dagenham Road, RM13 7SR	Ebbcliff Ltd.	Live	Inert Landfill

* *Non-Hazardous Landfill = no threats to human health or the environment*

* *Deposit for Recovery = waste materials (inert soils and aggregates) to be permanently deposited (and replace non-waste materials) on other land for restoration/improvement*

* *Inert Landfill = no substances that are chemically or physically reactive (sub-category of "non-hazardous")*

* *Landfill Gas Combustion = uses gases produced by the landfill to produce energy (for Rainham power station)*

3.6 The above table shows the 14 sites, including who operates them and the type of site it is. However, it should be noted that, in practice, it is considered that some of the operating sites have little or no activity going on (ie. no longer receiving waste.). Consequently, there may only be four sites that are actively operational:

- Rainham Landfill (*with Rainham Generation Plant as part of the same site*)
- East Hall Farm
- Wennington Quarry
- Silt Lagoons

Illegal Sites Across the Borough

3.7 The EA has stated that they are not aware of any substantive illegal waste sites or major fly-tipping sites within the Borough.

Flood Risk Areas Across the Borough

3.8 For context, as the situation that led to Zane's death involved the flooding of a river after heavy rainfall, a map of the Environment Agency river flooding risk areas for the borough of Havering is shown in Appendix 1.

3.9 The surface water drainage (overland run-off after heavy rainfall) flooding risk areas for the borough, over the next 100 years, are shown in Appendix 2.

3.10 The locations of historic flood reports during the period 2007 to 2023

are shown in Appendix 3.

- 3.11 Consequently, across the borough, four official EA landfill sites initially appear to potentially be in or closely adjacent to a medium or high flood risk area or near to locations of flood reports (2007-2023):

- East Hall Farm
- Wennington Quarry
- South Hall Farm
- M25 (jnct. 28)

- 3.12 No detailed analysis has been undertaken by the Council of these specific sites relative to their flood risks or to their location near to previous flood reports.

Contaminated Land Inspection Strategy

- 3.13 Under the Environmental Protection Act 1990 Part 2A the Council is required to take a strategic approach to inspecting the borough to identify areas of contaminated land, set out its approach as a written strategy and to keep the strategy under periodic review.

- 3.14 Havering's most recent strategy was issued in 2016 to cover the period 2017 to 2021. The constraint on staffing resource and focus on Arnold's Field has meant that the strategy has not yet been able to be reviewed.

Register of Contaminated Land

- 3.15 Local authorities are required to maintain a public register of Contaminated Land under Part 2A of the Environmental Protection Act 1990. This register details regulatory actions taken by the council regarding sites designated as contaminated, such as remediation notices, declarations of remediation, and any convictions for offences under the Act.

- 3.16 In Havering, the last register was published in 2017. However, no new determinations of contaminated were made between 2017 and 2024. No additional site investigations, leading to formal determinations, have been carried out by the Council during this period. The Arnold's Field site on Launders Lane has been added to the register in October 2025.

Resource Challenges

- 3.17 Implementing Zane's Law would have significant resource implications on the Council and would require a significant injection of funding to avoid a substantive impact on other areas of work.

- 3.18 If the ambitions of Zane's Law are fully realised, it is essential that

the Government provide full funding to deliver on all the necessary activity related to inspection, testing, monitoring, enforcement and remediation in relation to issues of contamination and pollution. Without this funding, the Council would not be able to fulfil the ambitions stated.

Lobbying Approach

- 3.19 To support this further, the following can be done to lobby for a new law. This includes:
- Sign and share the petition with residents - https://you.38degrees.org.uk/petitions/make-toxic-landfills-safe-support-zane-s-law?source=twitter_share_button&utm_medium=socialshare&utm_source=twitter&share=dcf1c7f8-5667-49fe-852c-e7aa10d82cba
 - Write to our local MPs to ask them to support all efforts to get Zane's Law onto the statute book.
 - Release a public statement and press release for media and Living
 - Post on social media using the hashtag #ZanesLaw.

REASONS AND OPTIONS

Whilst Zane Gbangbola's case took place outside of Havering, the principles and concerns about the matters arising have been the subject of local interest in the borough.

The options considered by officers were:

1) Do Nothing

In light of criticism, from residents and the media, of the Council in relation to matters pertaining to land affected by contamination and the specific reference by local campaign groups to Zane's Law – doing nothing could result in heightened criticism of the Council (especially as other local authorities have already expressed support).

2) Proactive Expression of Support

This was considered to be the best overall approach as it not only provides a platform to lobby for an improved regulation regime to monitor and address potential contamination/pollution and for the necessary resourcing to be provided by Government but also provides a framework to assist in protecting the health of local residents.

IMPLICATIONS AND RISKS

Financial Implications and Risks

If “Zane’s Law” is passed, the resulting additional responsibilities will require extra staffing capacity within the Public Protection service, for which there is currently no financial provision. The Zane’s Law campaign proposes that full funding should be provided by Government.

Legal Implications and Risks

This report is a member update with no separate direct legal implications at present.

Human Resources Implications and Risks

If “Zane’s Law” is passed, the result would be an increase in workloads for which there may not be sufficient capacity currently. There are no other known HR implications and risks.

Equalities Implications and Risks

Supporting the principles of Zane’s Law aligns with the Council’s Public Sector Equality Duty under the Equality Act 2010. Although this report does not in itself introduce a new policy or service, the subject matter – reducing risks from contaminated land and legacy landfill sites – has clear implications for equality, health, and wellbeing.

Environmental hazards can disproportionately affect certain groups, including children, older people, pregnant women, disabled residents (particularly those with pre existing medical conditions), and residents living in lower-income or flood-prone areas. National evidence also highlights that some Black, Asian and Minority Ethnic communities experience greater environmental risk exposure.

Indicators are that those living in proximity of residence to landfill sites, river flood areas and surface water risk areas are more likely to be those with deprivations and so the campaign proposals would have a beneficial impact on the reduction of inequalities.

By expressing support for Zane's Law, the Council demonstrates its commitment to ensuring all residents benefit equally from a safe and healthy environment. This approach contributes positively to reducing health inequalities and advancing environmental justice across Havering.

There are therefore **no negative** equality implications, but the proposal carries a **positive equality impact** in promoting fairness, protection, and wellbeing for vulnerable groups.

Health and Wellbeing Implications and Risks

Landfill sites or other unregulated waste sites that are affected by climatic conditions (eg. sustained flooding, periods of extreme heat leading to increased risk and impact of wildfires) may cause pollutants to be released which may be harmful to both the physical and mental health of the public. Failure to express proactive support may add to the existing burden of mental ill-health (e.g. anxiety) associated with the perceived risk from an external source outside of an individual's control. This may be particularly impactful to residents living in close proximity to waste sites in the Borough where fires occur regularly.

Environmental and Climate Change Implications and Risks

Climate change and the resulting increases in extreme weather events (such as increased periods of heavy rainfall) are likely to increase the risks of flooding which may impact landfill and other waste dumping sites close to flood risk areas.

In such circumstances, there is an increased risk (albeit limited on sites supervised by the Environment Agency) of pollution leaching into the environment with potential effects on the environment (flora, fauna and air quality).

BACKGROUND PAPERS

Documents referenced or considered in the production of this report:

Inquest Report (Reg. 28) – Zane Gbangbola – Action To Prevent Future Deaths

September 2016, Surrey Coroner's Court

<https://www.judiciary.uk/wp-content/uploads/2017/01/Gbangbola-2016-0328.pdf>

Factual Findings and Conclusions – Death of Zane Gbangbola

September 2016, Surrey Senior County Coroner

<https://democracy.spelthorne.gov.uk/documents/s38910/Appendix%201%20Coroners%20Findings%20and%20Conclusions.pdf>

Draft Local Flood Risk Management Strategy

August 2024, Havering Council

[havering-local-flood-risk-management-strategy/2024/draft](#)

Surface Water Management Plan

2017, Havering Council (in process of being updated)

[Strategic Flood Risk Assessment 2017 | London Borough of Havering](#)

Contaminated Land Inspection Strategy (2017-2021)

November 2016 (Rev. 02), Havering Council

<https://www.havering.gov.uk/downloads/file/537/contaminated-land-inspection-strategy>

Public Register of Contaminated Land

December 2017, Havering Council

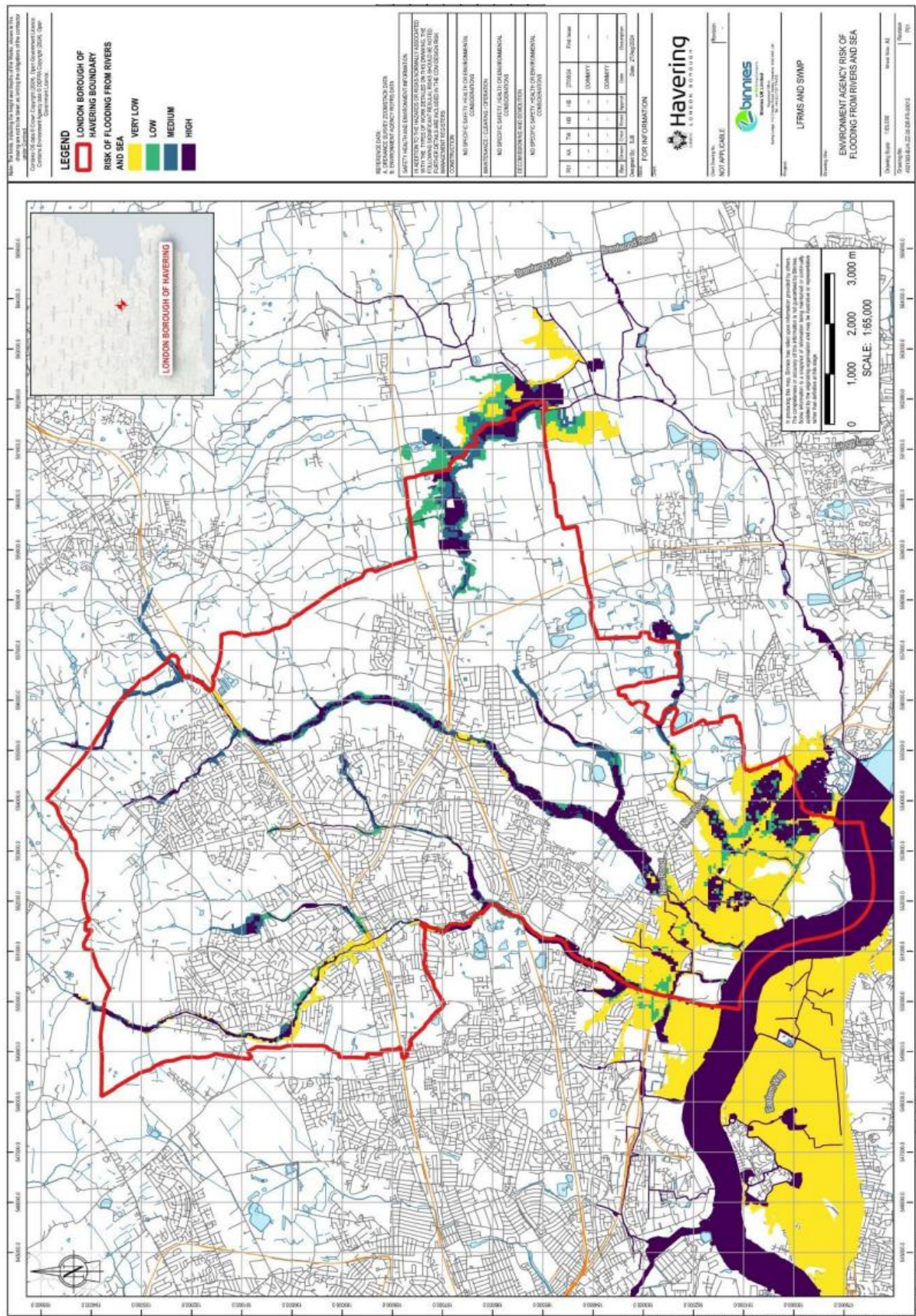
<https://www.havering.gov.uk/downloads/file/536/public-register-of-contaminated-land>

Online Information from the Zane's Law Campaign

<https://zaneslaw.co.uk>

<https://www.truthaboutzane.com>

APPENDIX 1 – River flood risk areas (Environment Agency)



APPENDIX 2 – Surface water flooding risk areas (1 in 100 years)

