



Haverling

LONDON BOROUGH

STRATEGIC PLANNING COMMITTEE AGENDA

7.00 pm	Thursday 8 May 2025	Council Chamber, Town Hall, Main Road, Romford RM1 3BD
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Members 6 Quorum 3

COUNCILLORS:

**Conservative Group
(2)**

Ray Best
Timothy Ryan

**Haverling Residents' Group
(3)**

Reg Whitney (Chairman)
Bryan Vincent (Vice-Chair)
John Crowder

**Labour Group
(1)**

Jane Keane

For information about the meeting please contact:

**Taiwo Adeoye - 01708 433079
taiwo.adeoye@onesource.co.uk**

**To register to speak at the meeting please call 01708 433100
before Tuesday 6 May 2025**

Please would all Members and officers attending ensure they sit in their allocated seats as this will enable correct identification of participants on the meeting webcast.

Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.

Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.

Protocol for members of the public wishing to report on meetings of the London Borough of Havering

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means: -

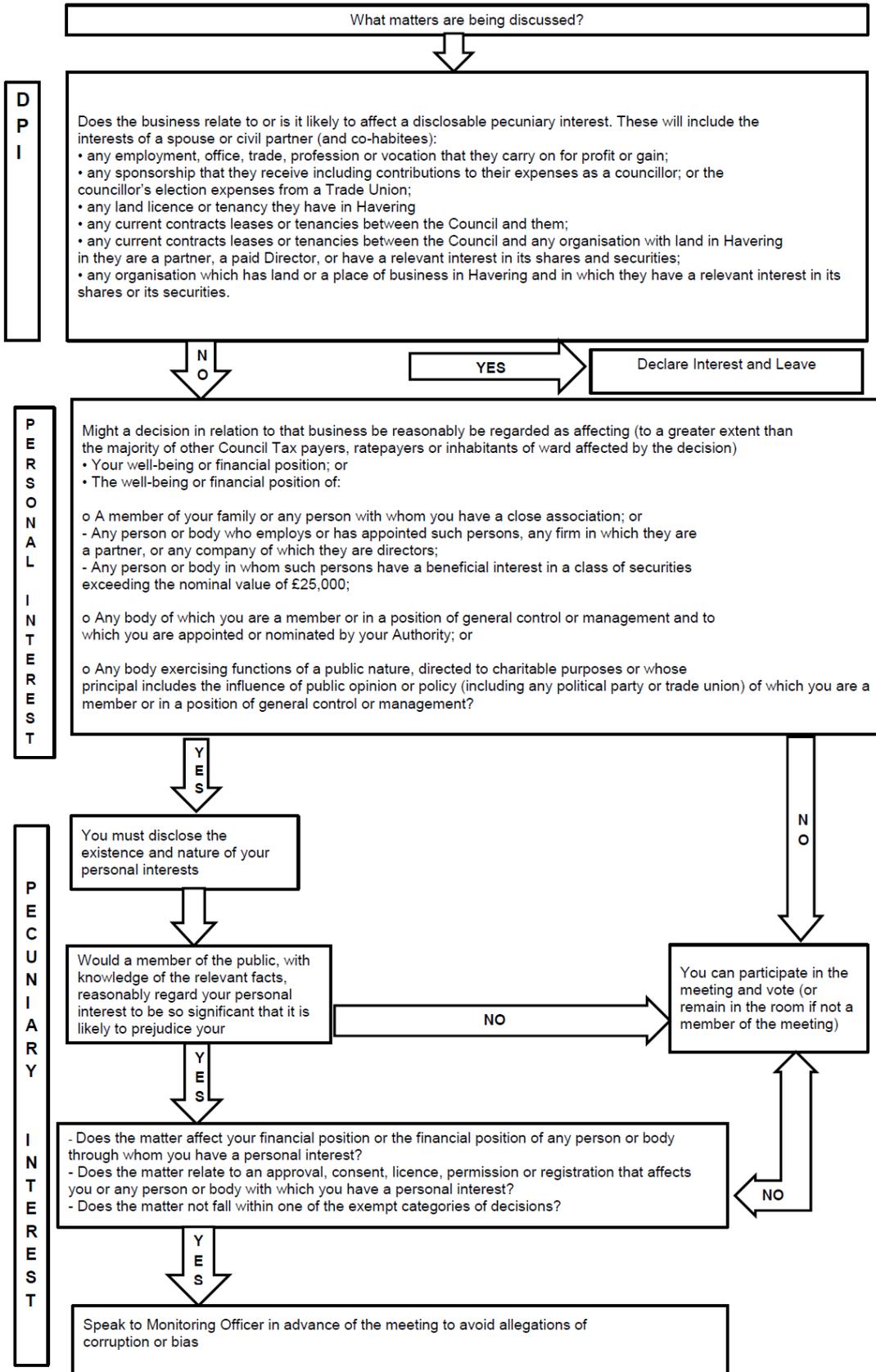
- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Principles of conduct in public office

In accordance with the provisions of the Localism Act 2011, when acting in the capacity of a Member, they are committed to behaving in a manner that is consistent with the following principles to achieve best value for the Borough's residents and to maintain public confidence in the Council.

SELFLESSNESS: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP: Holders of public office should promote and support these principles by leadership and example.

AGENDA ITEMS

1 CHAIR'S ANNOUNCEMENTS

The Chairman will make his announcements.

Applications for Decision

I would like to remind members of the public that Councillors have to make decisions on planning applications strictly in accordance with planning principles.

I would also like to remind members of the public that decisions may not always be popular, but they should respect the need for Councillors to take decisions that will stand up to external scrutiny or accountability.

2 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

(if any) - receive.

3 DISCLOSURE OF INTERESTS

Members are invited to disclose any interest in any of the items on the agenda at this point in the meeting.

Members may still disclose any interest in an item at any time prior to the consideration of the matter.

4 MINUTES (Pages 7 - 8)

To approve as a correct record, the minutes of the meeting of the Committee held on 27 February 2025 and to authorise the Chair to sign them.

5 APPLICATIONS FOR DECISION (Pages 9 - 12)

Report attached.

6 P1463.24 - DORRINGTON GARDENS CAR PARK (HORNCHURCH) (Pages 13 - 34)

Report attached.

7 P1633.24 - VEOLIA ES (UK) LTD COLDHARBOUR LANE (RAINHAM AND WENNINGTON) (Pages 35 - 64)

Report attached.

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

**MINUTES OF A MEETING OF THE
STRATEGIC PLANNING COMMITTEE
Council Chamber, Town Hall, Main Road, Romford RM1 3BD
27 February 2025 (7.00 - 9.03 pm)**

Present:

COUNCILLORS

Conservative Group Timothy Ryan

Havering Residents' Group Reg Whitney (Chairman), Bryan Vincent (Vice-Chair) and John Crowder

Labour Group Jane Keane

12 CHAIR'S ANNOUNCEMENTS

The Chairman reminded Members of the action to be taken in an emergency.

13 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS

Apologies were received from Councillor Ray Best.

14 DISCLOSURE OF INTERESTS

There were no disclosures of interests.

15 MINUTES

The minutes of the previous meeting held on 23rd January 2025 were agreed as a correct record and signed by the Chairman.

16 APPLICATIONS FOR DECISION

The report outlined the application for decision and was **noted** by the Committee.

17 P1274.23 AND P1150.24 - LAND BOUND BY CHIPPENHAM ROAD, KINGS LYNN DRIVE & DARTFIELDS, HAROLD HILL

The Committee received a presentation on 2 applications for decision; the demolition of all existing buildings and structures relating to The Alderman Public House and the redevelopment of the site and the erection of 4 residential blocks to provide 138 affordable housing units, including landscaping, car parking and cycle parking.

It was noted the application had previously been presented to the Committee in January 2024. Members raised concerns over the demolition of the PH and the impact that would have on residents who use it for social purposes to which officers explained a temporary PH would be created with future plans to build a permanent one into the redevelopment of the local shopping centre. Members also raised concerns regarding the replanting of trees and expressed they believe new trees should be mature and not replanted as young saplings. Finally, members questioned the availability and location of mobility scooter storage; officers considered adapting the condition of cycle storage to alter the available storage to enable residents to store their mobility scooters safely and securely.

Members asked for further strengthening of the landscape condition, flexibility within the cycle storage to accommodate mobility scooters and to retain internal parts of The Alderman PH to repurpose (which would be taken as an informative as opposed to an obligation).

The Committee:

1. **Approved** application P1274.23 unanimously
2. **Approved** application P1150.24 with 4 votes for and 1 abstention

Cllr Jane Keane abstained from the second vote.

18 **QUARTERLY PLANNING PERFORMANCE UPDATE**

The Committee considered the quarterly reporting of performance to the planning committees and **RESOLVED** to note the contents of the report.

Members were advised to contact officers directly if there are any enquiry on any item.

Chairman

Agenda Item 5

Applications for Decision

Introduction

1. In this part of the agenda are reports on Strategic Planning applications for determination by the committee.
2. Although the reports are set out in order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a specific application, you need to be at the meeting from the beginning.
3. The following information and advice only applies to reports in this part of the agenda.

Advice to Members

Material planning considerations

4. The Committee is required to consider planning applications against the development plan and other material planning considerations.
5. The development plan for Havering comprises the following documents:
 - London Plan Adopted March 2021
 - Havering Local Plan 2016 – 2031(2021)
 - Site Specific Allocations (2008)
 - Site Specific Allocations in the Romford Area Action Plan (2008)
 - Joint Waste Development Plan (2012)
6. Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken.
7. Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.
8. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special

attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

9. Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
10. In accordance with Article 35 of the Development Management Procedure Order 2015, Members are invited to agree the recommendations set out in the reports, which have been made based on the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.

Non-material considerations

11. Members are reminded that other areas of legislation cover many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:
 - Building Regulations deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
 - Works within the highway are controlled by Highways Legislation.
 - Environmental Health covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
 - Works on or close to the boundary are covered by the Party Wall Act.
 - Covenants and private rights over land are enforced separately from planning and should not be considered.

Local financial considerations

12. In accordance with Policy 6.5 of the London Plan (2015) the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL) to fund CrossRail.
13. Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through a section106 agreement. Where these are necessary, it will be explained and specified in the agenda reports.

Public speaking and running order

14. The Council's Constitution allows for public speaking on these items in accordance with the Constitution and the Chair's discretion.
15. The items on this part of the agenda will run as follows where there are registered public speakers:

- a. Officer introduction of the development
 - b. Registered Objector(s) speaking slot (5 minutes)
 - c. Responding Applicant speaking slot (5 minutes)
 - d. Ward Councillor(s) speaking slots (5 minutes)
 - e. Officer presentation of the material planning considerations
 - f. Committee questions and debate
 - g. Committee decision
16. The items on this part of the agenda will run as follows where there are no public speakers:
- a. Where requested by the Chairman, officer presentation of the main issues
 - b. Committee questions and debate
 - c. Committee decision

Late information

17. Any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in the Update Report.

Recommendation

18. The Committee to take any decisions recommended in the attached report(s).

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 <p>Havering LONDON BOROUGH</p>	<p>Strategic Planning Committee</p> <p>8 May 2025</p>
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Application Reference: P1463.24

Location: Dorrington Gardens Car Park, Hornchurch
Ward

Description: Demolition and removal of all structures and hardstanding and construction of 34 residential dwellings, creation of a new access, with car parking, landscaping and related infrastructure, including a new substation (Amended description).

Case Officer: Malachy McGovern

Reason for Report to Committee: The applicant for the development is the Council’s development arm, Mercury Land Holdings

1 BACKGROUND

1.1 The application site comprises the Dorrington Gardens public car park, a Council-owned asset located on the south-western edge of Hornchurch town centre. The site currently accommodates 188 marked car parking spaces, including provision for disabled users, and is formed of predominantly hardstanding with minimal landscape features. In accordance with the Council’s Capital Strategy and medium-term asset disposal programme, the Dorrington Gardens car park was identified as surplus to operational requirements. Following statutory consultation in early 2023, including amendments to the Traffic Management Orders and consideration of alternative parking capacity in the local area, the Council’s Cabinet resolved to authorise disposal of the site to optimise its contribution towards housing delivery and the wider economic, social and environmental wellbeing of the borough.

1.2 The applicant, Mercury Land Holdings Ltd—a wholly owned Council company—has submitted a full planning application seeking consent for the demolition and clearance of the existing car park and the redevelopment of the site to provide 34 residential dwellings, together with a new vehicular access, associated car parking, landscaping and ancillary infrastructure including a substation. The proposals follow detailed pre-application discussions with

Council officers and design review by the Havering Quality Review Panel on Tuesday 12th December 2023, with a number of revisions incorporated in response to design, landscape and amenity considerations. The site is not subject to specific restrictive policy designations on the Local Plan Policies Map but lies within the Hornchurch District Centre and is considered a highly accessible location (PTAL 4), appropriate for residential intensification consistent with adopted local and regional planning policy objectives.

2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 2.1 The proposed development would make a valuable contribution to meeting the Borough's housing need by delivering 34 high-quality dwellings, including a mix of family-sized houses and smaller units, on previously developed land within a sustainable urban location. The loss of the existing car park is justified by both strategic asset management priorities and evidence confirming surplus capacity in alternative off-street and on-street provision. The scheme has been subject to detailed pre-application engagement and Quality Review Panel assessment, resulting in a design-led approach that is responsive to local character, delivers a well-integrated streetscape, and secures an appropriate balance between density, amenity and landscape provision. The proposals are considered to have an acceptable impact on the amenity of neighbouring occupiers, provide adequate parking and sustainable transport measures, and comply with relevant local and regional planning policy objectives.

3 RECOMMENDATION

- 3.1 That the Committee resolve to GRANT planning permission subject to:
- The prior completion of a legal agreement pursuant to Section 106 of the Town and Country Planning Act 1990 (as amended), Section 16 of the Greater London Council (General Powers) Act 1974 and all other enabling powers to secure the following planning obligations:
 - A Carbon offset payment
 - Restrict Future Resident's Access to Parking Permits
 - An Affordable Housing payment of £77,129 and a late stage affordable housing review mechanism.
 - The developer to pay the Council's legal costs associated with the preparation and negotiation; of the planning obligation irrespective of whether or not it is completed the Council's administrative costs associated with monitoring compliance with the obligation terms and all contributions to be indexed using BCIS Tender Price Index from the date of completion of the section 106 obligation to the date of actual payment.
- 3.2 That the Assistant Director Planning is delegated authority to negotiate the legal agreement indicated above.

- 3.3 That the Assistant Director Planning is delegated authority to issue the planning permission subject to the prior completion of the Section 106 obligation and the following planning conditions:

The following conditions;

1. Time for commencement
2. Scheme to be carried out in accordance to plans
3. No additional windows on the flank elevations
4. Removal of Permitted development for houses– (outbuildings, extension, roof enlargement).
5. Materials
6. Landscaping
7. Existing Trees protected during construction
8. Boundary treatment (walls and fences) surrounding the site.
9. Refuse and recycling
10. Cycle storage
11. Hours of construction 8.00am and 6.00pm Monday to Friday, and between 8.00am and 1.00pm on Saturdays and not at all on Sundays and Bank Holidays/Public Holidays.
12. Air quality neutral
13. Dust management plan
14. Contaminated land
15. Construction management plan
16. Sustainable drainage, including Surface water management plan
17. Electric Charging
18. Secure by design
19. Boilers
20. Water efficiency
21. All measures to be in accordance with submitted ecological appraisal
22. Habitat Management and Monitoring Plan (HMMP)
23. Reptile Mitigation Strategy
24. Biodiversity Enhancement Strategy
25. External lighting including Wildlife Sensitive Lighting Design
26. Biodiversity Net Gain
27. Maximising the use of PV panels
28. Noise – from plant and machinery.
29. Non Road Mobile Machinery (NRMM)
30. Land contamination;
31. Archaeology
32. Parking management plan.
33. M4(2) and M4(3) Housing

Informatives

CIL, Highways works, reason for granting permission, new house numbering

4. Site and Surroundings

- 4.1 The application site comprises a 0.6-hectare area of land currently in use as a surface-level public car park, situated to the south-west of Hornchurch District Centre. The site is located on the southern side of Dorrington Gardens and is accessed directly from this local road. The car park is surfaced entirely in

tarmac and accommodates 188 marked parking bays, including 5 designated disabled spaces. A modest central landscape strip and a limited number of trees are situated within and around the periphery of the site. Site levels fall gently from the northern boundary towards the centre before rising again toward the southern edge. The site is largely flat and free from built structures.

- 4.2 The site lies within a transitional urban context. To the immediate north and north-east are residential and mixed-use developments associated with the Hornchurch town centre fringe, including a three/four-storey apartment block. The eastern boundary adjoins the rear of commercial and residential properties fronting Station Lane, while to the south and west the surrounding area comprises a suburban residential neighbourhood of predominantly two-storey semi-detached and detached dwellings. The site benefits from strong public transport connectivity, with Hornchurch Underground Station approximately 850m to the south, Emerson Park Overground Station 1km to the north, and multiple bus routes accessible within 170m. The site is located within PTAL Zone 4, reflecting good accessibility by sustainable modes of transport. There are no statutory or locally listed buildings on the site, nor is it located within a conservation area or subject to any specific landscape or ecological designations.
- 4.3 The site is not located within a conservation area, nor does it contain or adjoin any statutorily or locally listed buildings. As such, there are no designated or non-designated heritage assets either on or immediately adjacent to the site that would be affected by the proposed development. The site lies within Flood Zone 1, as defined by the Environment Agency, and is therefore considered to be at low risk of flooding from rivers or sea.

Proposed development

- 5.1 Full planning permission is sought for the demolition and removal of all existing hardstanding and ancillary structures associated with the existing car park, and the redevelopment of the site to provide 34 residential dwellings. The proposal comprises a mix of 10 one-bedroom apartments, 12 two-bedroom apartments, and 12 three-bedroom semi-detached houses. The development also includes the formation of a new vehicular access from Dorrington Gardens, associated car parking, hard and soft landscaping, and the installation of ancillary infrastructure, including a new electricity substation.
- 5.2 The development adopts a mixed typology, with two pairs of semi-detached houses (HT2) on either side of the main site access road fronting Dorrington Gardens, two apartment blocks (Blocks A and B) fronting the internal road of the site, and a row of 8 semi-detached houses (HT1) to the south of the site fronting the internal road to the site. The scheme has been subject to a detailed design evolution, incorporating feedback from pre-application consultation, the Havering Quality Review Panel, and the Council's urban design and highways officers. The development is predominantly two to three storeys in height and has been designed to respond to local character, manage level changes across the site, and provide appropriate separation distances to neighbouring residential boundaries.

- 5.3 A total of 24 car parking spaces are proposed, comprising a mix of on-plot and on-street provision, equating to a parking ratio of approximately 0.7 spaces per dwelling. Cycle parking is provided in accordance with London Plan standards, with long-stay secure cycle storage for all dwellings and additional visitor spaces within the public realm. Refuse and recycling storage is provided to the rear of each house and within secure bin stores for the apartment blocks, with collection arrangements designed in accordance with the Council's Waste Planning Guidance. The scheme includes soft landscaping throughout, including tree planting, private amenity spaces for all dwellings, and a communal green area with opportunities for informal play.

6. Planning History

- 6.1 A review of the Council's online planning records indicates that there is no substantive planning history associated with the application site. The site has historically operated as a public 'Pay and Display' car park under the ownership of the London Borough of Havering, with no records of previous planning applications for redevelopment or significant alterations.
- 6.2 The site was formally identified for potential disposal as part of the Council's medium-term asset management strategy. Cabinet authority to progress with the disposal of the car park was granted following statutory consultation undertaken in March 2023 regarding the proposed removal of the site from the Council's Off-Street Parking Order and associated Traffic Management Orders. This included consideration of car park utilisation data and the availability of alternative parking provision in the local area. The decision to dispose of the site was reaffirmed by Cabinet in August 2023, with the site deemed surplus to operational requirements and suitable for redevelopment to support the Council's strategic housing and regeneration objectives.

LOCAL REPRESENTATIONS

- 7.1 138 letters of notifications were sent to the adjoining occupiers. 42 objections have been received and 1 letter of support. The objections can be summarised as follows:

Issue 1: Loss of light and overlooking to existing dwellings; concerns about gas flue and electricity meter; loss of rear access; impact on privacy and noise levels.

Officer Response: The proposed development has been subject to detailed design evolution, including assessment of separation distances and boundary relationships. No habitable room windows are directly aligned toward sensitive boundaries, and any overshadowing is within BRE guidelines. Utility connections and access arrangements will be protected during construction and further clarified by condition.

Issue 2: Reduction of public car parking impacting local businesses; historic land use concerns (e.g. former allotments).

Officer Response: Parking surveys demonstrate significant underutilisation of the existing car park. Sufficient alternative parking is available nearby. There

are no planning constraints preventing redevelopment. The principle of optimising brownfield land for housing aligns with local and London Plan policy.

Issue 3: Local infrastructure (GPs, schools, transport) is overstretched; concerns about council finances and cost of additional service demands.

Officer Response: The scale of development is modest (34 units) and CIL/s106 contributions will support infrastructure improvements. No statutory consultees have raised objections on infrastructure grounds. Local Plan housing targets require use of suitable sites such as this.

Issue 4: Loss of privacy and outlook, especially from new dwellings at the rear; concern about height and building line inconsistencies.

Officer Response: The scheme has been revised in response to QRP and design officer feedback. First-floor lines and building depths reflect local context. Overlooking distances meet policy requirements and no significant harm to neighbouring amenity has been identified.

Issue 5: Potential amenity impact from new tree planting; request for Right of Light assessment.

Officer Response: Landscaping proposals aim to enhance green infrastructure and biodiversity. Final species selection can be controlled by condition. Right to light is a private legal matter, though daylight/sunlight levels have been assessed and are policy compliant.

Issue 6: Increased congestion and unsafe parking in surrounding streets; parking overspill and pressure on cul-de-sacs such as Bruce Avenue.

Officer Response: The site has good public transport access (PTAL 4) and proposed parking levels are compliant with the London Plan. The scheme includes cycle parking and encourages modal shift. Traffic impacts have been reviewed and deemed acceptable.

Issue 7: Loss of wildlife habitat and views of trees; concerns over tree removal.

Officer Response: A full Arboricultural Impact Assessment and Biodiversity Net Gain report have been submitted. The scheme retains existing trees where possible and proposes significant new planting, achieving measurable ecological enhancements.

Issue 8: Impact on Hornchurch town centre vitality due to loss of customer parking; cumulative impact of other car park closures.

Officer Response: Town centre viability is supported by increased local population from new homes. Surveys show surplus parking capacity in the area. The Council's Active Travel Strategy also supports reduced car reliance for short journeys.

Issue 9: Development out of character with low-rise surroundings; visual impact of flats.

Officer Response: The proposal is predominantly 2–3 storeys in height, consistent with local character. Design has been assessed by the Havering QRP and deemed contextually appropriate. Materials and form are sympathetic to surrounding built form.

Issue 10: Construction phase disruption (noise, traffic, access).

Officer Response: A Construction Management Plan will be secured by condition to mitigate impacts. Construction hours and site operations will be controlled to minimise disturbance to neighbouring residents.

Internal and External Consultation:

7.2 Internal Consultees

LBH Environmental Health (Noise & contamination) - No objections subject to conditions

LBH Environmental Health (Air quality) - No objections subject to conditions

LBH Highways - No objections subject to conditions

LBH Waste & Recycling - No objections subject to conditions

Place Services (Ecology) - No objections subject to conditions

LBH Naming & Numbering – No objection

LBH Local Lead Flood Officer – no objection

7.3 External Consultees

Anglican Water Authority – No objection

Thames Water – No objection

Essex & Suffolk Water – No objection

London Fire – No objection

Historic England (GLAAS) – No objection

Environment Agency – No objection

Metropolitan Police – No objection subject to condition

Schools Organisation – No objection and request for contribution

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main issues for consideration for this application are:

- The principle of development
- Housing Mix - size
- Scale, height, bulk and design
- Quality of the proposed accommodation
- Impact on Neighbouring Amenity
- Transport and Highways
- Environment Issues
- Sustainability
- Flooding and Drainage
- Ecology
- Energy Efficiency
- Community Infrastructure Levy / s106
- Equalities

Principle of development

- 8.2 The application site comprises previously developed land within the urban area, currently used as a surface-level public car park. The site is not subject to any statutory or non-statutory designations which would constrain redevelopment, and it is not located within the Green Belt or a conservation area. The site benefits from good accessibility to local services and public transport (PTAL 4) and is within close proximity to Hornchurch District Centre. As such, it represents a suitable and sustainable location for residential intensification in line with the policy objectives of the Development Plan.
- 8.3 The National Planning Policy Framework (NPPF, 2024) sets out a clear presumption in favour of sustainable development and places increased emphasis on unlocking the potential of under-utilised urban land for housing delivery. It promotes the reuse of previously developed land within settlements, particularly in locations well served by public transport, services and infrastructure. The NPPF supports housing-led redevelopment of brownfield sites such as car parks where proposals optimise site capacity and contribute meaningfully to local housing supply.
- 8.4 The London Plan (2021) similarly encourages boroughs to proactively support residential development on surplus public land and low-density commercial sites. Policy GG4 promotes delivering the homes Londoners need, while Policy H1 seeks to optimise housing delivery on all suitable brownfield sites, including car parks (Policy H1(2)(b)). Policy SD7 supports the intensification of town centre locations and acknowledges the redevelopment of surface car parks as a strategic source of housing land supply.
- 8.5 At the local level, the Havering Local Plan (2021) identifies a minimum housing delivery target of 12,850 homes over the plan period (Policy 3). The site is located within the boundary of Hornchurch District Centre, where Policy 13 and Policy 3 support the delivery of residential uses to help meet identified housing needs. The Local Plan also reflects the strategic priority of utilising under-used land, consistent with Policy 36, which promotes sustainable development and low-carbon living. While the loss of the existing car park is noted, Policy 24

states that development proposals resulting in the loss of public parking must demonstrate there is no need for these spaces.

- 8.6 In this regard, robust car parking utilisation surveys have been submitted with the application, demonstrating that the existing facility is significantly under-used and that sufficient alternative parking provision is available in the local area. These findings were previously reviewed and accepted by the Council as part of the statutory consultation and Cabinet decision-making process authorising the site's disposal. Moreover, the Council's Active Travel Strategy supports a long-term reduction in private vehicle dependency through investment in walking and cycling infrastructure.
- 8.7 It is therefore considered that the principle of residential redevelopment is acceptable, and fully supported by national, regional and local planning policy. The proposal would contribute to the Borough's housing supply, make more effective use of previously developed land, and deliver high-quality homes in a highly sustainable location. The loss of the existing car park has been justified, and no conflict is identified with the relevant provisions of the NPPF, London Plan or Havering Local Plan.

Housing supply;

- 8.8 On the 12th December 2024, the Government published the Housing Delivery Test result for 2023. The Housing Delivery Test Result for Havering for 2023 is 61%. In accordance with the NPPF the "Presumption" due to housing delivery therefore applies.
- 8.9 In terms of housing supply, based on the latest 2024 Housing Trajectory, Havering is able to demonstrate 3.4 years supply of deliverable housing sites. The Havering Local Plan was found sound and adopted in 2021 in the absence of a five year land supply. The Inspector's report concluded:
- "85. Ordinarily, the demonstration of a 5-year supply of deliverable housing land is a prerequisite of a sound plan in terms of the need to deliver a wide choice of homes. However, in the circumstances of this Plan, where the housing requirement has increased at a late stage in the examination, I ultimately conclude that the Plan, as proposed to be modified, is sound in this regard subject to an immediate review.
86. This is a pragmatic approach which is consistent with the findings of the Dacorum judgement. It aims to ensure that an adopted plan is put in place in the interim period before the update is adopted and the 5-year housing land supply situation is established."
- 8.10 The Council is committed to an update of the Local Plan and this is set out in the Council's Local Development Scheme. Therefore, in the meantime whilst the position with regard to housing supply is uncertain, the "Presumption" due to housing supply is applied.

- 8.11 The Presumption refers to the tilted balance set out in Paragraph 11(d) of the NPPF as if the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) has been engaged.
- 8.12 Para 11(d) states that where the policies which are most important for determining the proposal are out of date, permission should be granted unless (i) the application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for refusing the development, or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Fundamentally this means in this circumstance that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

9 Affordable housing, and the Mix of dwelling unit size

- 9.1 The proposed development comprises a total of 34 residential units, made up of the following mix:
- 10 x 1-bedroom apartments
 - 12 x 2-bedroom apartments
 - 12 x 3-bedroom semi-detached houses
 -
- This mix includes a substantial proportion of family housing (35%), which supports the objectives of Policy 5 of the Havering Local Plan (2021) to provide a range of dwelling types and sizes to meet identified local needs, including for larger homes. The mix is also consistent with the findings of the Council's Strategic Housing Market Assessment (SHMA), which identifies a need for both smaller and family-sized dwellings within the Borough.
- 9.2 Policy H10 of the London Plan (2021) and Policy 5 of the Havering Local Plan seek to secure an appropriate housing mix that responds to local context, housing need, and site characteristics. The proposed combination of apartment blocks and family-sized houses reflects the site's transitional location at the edge of Hornchurch town centre and the surrounding suburban character, with 71% of the dwellings being 2 bed flats or 3 bedroom dwellings. The arrangement of units has been designed to optimise site capacity while ensuring a high standard of residential amenity and compliance with design-led density principles as set out in Policy D3 of the London Plan.
- 9.3 With respect to affordable housing, Policy H4 of the London Plan and Policy 4 of the Havering Local Plan set a strategic target of 50% affordable provision on public sector land, subject to viability. The applicant has submitted a detailed Financial Viability Appraisal (prepared by Turner Morum) which demonstrates that the proposed development cannot viably support on-site affordable housing provision but proposes an off-site financial contribution of £77,129. The Viability Appraisal has been reviewed independently on behalf of the Council and the conclusions accepted, subject to a late-stage review mechanism being secured through the Section 106 Agreement in accordance with the Mayor of London's Affordable Housing and Viability SPG (2017).

9.4 Whilst the absence of affordable housing is regrettable, it is considered acceptable in this case having regard to the submitted and independently reviewed viability evidence. The scheme will nevertheless deliver new high-quality family housing on previously developed land in a sustainable town centre location, supporting both local and strategic housing delivery targets.

10. Layout, scale, bulk and Design assessment

10.1 The proposed development has been subject to a comprehensive design-led approach, shaped through detailed pre-application engagement with the Council's planning and urban design officers, as well as presentation to the Havering Quality Review Panel (QRP) in December 2023. The Panel concluded that the proposed scale and massing were appropriate for the context and recognised the potential of the scheme to serve as a benchmark for suburban housing-led regeneration in the Borough.

10.2 The site layout responds to the sites transitional character between the denser built form of Hornchurch town centre to the north and the lower-density suburban housing to the south and west. The scheme comprises a legible arrangement of perimeter blocks and a central shared-surface street, incorporating a mix of two- and three-storey buildings. The layout has been designed to ensure clear definition between public and private space, with good levels of natural surveillance and permeability. Proposed houses are aligned to face new streets and green spaces, while apartment blocks at the centre of the site take advantage of the open space and play space.

10.3 In terms of scale and bulk, the development ranges from two-storey semi-detached houses to three-storey apartment blocks, with variations in roof form and building articulation to reduce visual massing and integrate with surrounding residential typologies. The apartment blocks have been revised following QRP and officer feedback to simplify their form, improve entrance legibility, and strengthen their relationship with the public realm. The design avoids abrupt transitions in height and maintains appropriate building-to-building and building-to-boundary distances to preserve amenity and outlook for existing and future occupiers.

10.4 The architectural approach draws from local vernacular forms and materials, incorporating high-quality brickwork, articulated facades, and bay windows to create visual interest and character. The houses include recessed entrances, window reveals, and generous private gardens. Apartment blocks feature inset balconies and landscaped forecourts. Overall, the scheme is considered to represent a coherent and contextually appropriate design response, consistent with Policies D1, D3 and D4 of the London Plan, and Policies 7 and 26 of the Havering Local Plan, which seek high-quality, locally distinctive development that optimises site potential and contributes positively to place-making.

Quality Review Panel Summary:

QRP Comment: The proposed height, massing and density are appropriate; potential for benchmark suburban scheme.

Design Response: Final scheme retains 2–3 storey height with careful modulation of massing to ensure a contextually sensitive suburban layout.

QRP Comment: Semi-detached houses are particularly successful and suit the character of the area.

Design Response: The final design retains the semi-detached house typology, with refined internal layouts and improved garden access.

QRP Comment: Apartment blocks A, B and C are overly complex; consider fewer typologies and simplified forms.

Design Response: Blocks A and B have been simplified in layout and articulation; architectural consistency has been improved.

QRP Comment: Split forms in blocks to address level changes create unnecessary complexity; consider stepped entrances or ground floor design.

Design Response: Level changes are now addressed through subtle regrading and stepped thresholds, avoiding overly fragmented building forms.

QRP Comment: Undercroft parking compromises quality and sustainability; should be removed.

Design Response: Undercroft parking has been omitted from the revised scheme; surface and on-plot parking used instead.

QRP Comment: Replace Blocks A and B with a single L-shaped block to enhance layout, carbon efficiency, and outlook.

Design Response: Blocks remain separate to retain permeability and scale appropriate to the suburban context; layout refined and landscaping enhanced.

QRP Comment: Apartment entrances are poorly defined; should be more prominent in elevation and urban design.

Design Response: Entrances have been repositioned and framed to enhance visibility, legibility and street-level presence.

QRP Comment: Green spine and play areas are poorly located and underused; green space strategy needs revision.

Design Response: Central landscape redesigned as a communal focal space; play areas reoriented for improved usability and supervision.

QRP Comment: Spur road south of Block C is underutilised; opportunity for additional green space missed.

Design Response: Spur road has been redesigned with shared surfaces, planting, and integrated SuDS to enhance amenity.

QRP Comment: Extend Bruce Avenue pavement into site; realign house boundaries to support street tree planting and legibility.

Design Response: Southern footpath extended and layout revised to support future adoption; trees relocated to public realm.

QRP Comment: Architecture of houses is strong; brickwork and bays effective. Keep detailing simple to avoid value-engineering.

Design Response: Detailing retained and simplified to ensure deliverability; bay windows and materials coordinated across typologies.

QRP Comment: North-east corner balconies on Blocks A and B are weak and overexposed; consider replacing with bay windows.

Design Response: Corner balconies replaced with bay features to improve visual impact and provide more practical amenity space.

QRP Comment: Front rooms in houses are constrained; consider simplifying stair layout to improve proportions.

Design Response: Internal layouts revised to widen front rooms by simplifying stair configuration and hallway footprint.

11 Quality of the housing provision

- 11.1 Policy D6 of the London Plan stresses that, housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. And that the qualitative aspects of a development are key to ensuring successful sustainable housing.
- 11.2 The dwellings are provided with private gardens of adequate size and layout. All dwellings would comply with internal space standard. The proposal would also comply with Part M4(2) or M4(3) of the standard of mobility with respect to building control regulation.
- 11.3 Having regard to this arrangement, the proposed development would provide acceptable living conditions for future occupants in terms of light, outlook and privacy. It would comply with Policy 7 of the Havering Local Plan (2021) which seeks, amongst other things, to ensure developments achieve a high standard of amenity. The proposed development would also comply with the requirement of the Framework that developments seek to ensure a high standard of amenity for future users.

12 Impact on Neighbouring Amenity

- 12.1 Havering Local Plan Policy 7 states the council will not support applications where the proposal results in unacceptable overshadowing, loss of

sunlight/daylight, overlooking or loss of privacy to existing and new properties and has unreasonable adverse effects on the environment by reason of noise impact, vibrations and disturbance.

Daylight and Sunlight

- 12.2 A Daylight and Sunlight Assessment (prepared by GIA, dated October 2024) has been submitted in support of the application. The assessment has been undertaken in accordance with the methodology set out in the Building Research Establishment (BRE) Guidelines (2022 edition), and assesses the potential impact of the proposed development on neighbouring residential properties surrounding the site.
- 12.3 The results of the assessment confirm that the proposed buildings will not result in any material harm to the daylight or sunlight levels received by neighbouring properties. All surrounding windows tested — including those on properties along Dorrington Gardens, Bruce Avenue and The Avenue — either meet or comfortably exceed the recommended Vertical Sky Component (VSC) and Daylight Distribution (DD) targets. Sunlight availability to principal living room windows is also retained within acceptable levels in accordance with BRE guidance.
- 12.4 As such, officers are satisfied that the proposal complies with Policy D6 of the London Plan (2021) and Policy 7 of the Havering Local Plan (2021), which require development to avoid causing significant harm to the amenity of surrounding occupiers, particularly in relation to natural light and outlook.

Privacy and Overlooking

- 12.5 The development has been designed to avoid direct overlooking of neighbouring properties. The layout provides appropriate separation distances between new and existing buildings, with a minimum back-to-back distance of 21 metres between rear-facing windows of the new dwellings and existing houses to the south and west. Side-facing windows serving circulation spaces are either obscured or recessed, and window placement has been carefully considered to minimise overlooking.
- 12.6 The two apartment blocks are positioned at the centre of the site, ensuring that their upper-level balconies and windows do not result in undue loss of privacy to adjacent private gardens. The detailed design and orientation of the blocks have been refined through the Quality Review Panel process to further mitigate any risk of overlooking.
- 12.7 On this basis, the proposals are considered to comply with Policy D6 of the London Plan and Policy 7 of the Havering Local Plan, which require development to respect existing residential amenity in terms of privacy, overlooking, and visual dominance.

13 Transport & Highways

- 13.1 A Transport Statement (prepared by Transport Planning Practice, October 2024) has been submitted in support of the application. The Statement provides a comprehensive assessment of site accessibility, trip generation, parking, cycle provision, and servicing arrangements, and has been reviewed by the Council's Highways Team. The site benefits from a Public Transport Accessibility Level (PTAL) of 4, indicating good accessibility to public transport services, including six bus routes within 170m and two rail stations—Hornchurch Underground (District Line) and Emerson Park Overground—both within 1km walking distance. The surrounding area also benefits from a good-quality pedestrian and cycling network, and the site lies within walking distance of Hornchurch District Centre (400m).
- 13.2 Vehicular and pedestrian access would be provided via a new central access point from Dorrington Gardens. The development includes an internal shared-surface street layout with turning provision for refuse and delivery vehicles. Swept path analysis has been submitted demonstrating suitable manoeuvrability for service and emergency vehicles. Existing access points to the former car park will be closed, and redundant crossovers reinstated.
- 13.3 The proposal includes 24 car parking spaces, including 4 blue badge bays, which equates to a parking ratio of 0.71 spaces per unit. This is fully compliant with the London Plan (Policy T6.1) and Havering Local Plan Policy 24, which require a maximum of 0.75 spaces per unit in PTAL 4 locations. Parking provision has been reviewed through pre-application discussions and is considered to provide a suitable balance between supporting sustainable travel and managing potential overspill. The development will be subject to a Parking Design and Management Plan secured via condition.
- 13.4 Cycle parking is proposed in accordance with London Plan Policy T5 and Havering Local Plan Policy 24. A total of 64 long-stay cycle parking spaces are to be provided: apartment blocks will each include secure ground-floor stores with space for non-standard bicycles, and all houses will have private cycle stores accessed via gated side paths. Two short-stay visitor spaces will be located within the landscaped public realm.
- 13.5 Refuse collection and servicing will occur entirely within the site, with suitable access, turning and presentation arrangements for all unit types. Servicing is expected to generate up to four daily trips, predominantly by light goods vehicles. Swept path assessments confirm that LBH refuse vehicles and supermarket vans can access and egress the site safely.
- 13.6 Trip generation modelling using TRICS data for comparable edge-of-centre suburban sites estimates 9 vehicular trips in the AM peak and 7 in the PM peak, with total daily trips (all modes) expected to remain lower than the existing car park. The development will therefore result in a net reduction in local vehicle movements, particularly during peak hours and across the full day (estimated at -194 total trips). Walking, cycling and public transport impacts are considered negligible and capable of being absorbed by existing infrastructure.
- 13.7 Officers are satisfied that the proposed development would not give rise to unacceptable impacts on the highway network or transport infrastructure. The scheme complies with the sustainable transport objectives of the National

Planning Policy Framework (NPPF, 2024), Policies T1–T6 of the London Plan (2021), and Policies 23 and 24 of the Havering Local Plan (2021).

14 Other issues.

Flood Risk & Drainage

- 14.1 A Flood Risk Assessment and Drainage Strategy (prepared by Ardent Consulting Engineers, October 2024) has been submitted in support of the application. The site lies entirely within Flood Zone 1, as defined by the Environment Agency, and is therefore at low risk of flooding from rivers or sea. The site is not located within a Critical Drainage Area, nor is it subject to any recorded incidents of surface water or groundwater flooding.
- 14.2 In accordance with the requirements of the National Planning Policy Framework (NPPF, 2024), London Plan Policy SI 12, and Policy 32 of the Havering Local Plan (2021), a sustainable drainage strategy has been prepared to manage surface water runoff and maintain post-development runoff rates at or below greenfield levels. The submitted strategy includes the use of Sustainable Drainage Systems (SuDS) features such as permeable paving, cellular storage tanks, and attenuation crates beneath the shared surface road. Surface water will be discharged at a restricted rate to the public surface water sewer network via a new on-site connection.
- 14.3 Foul drainage will be discharged to the existing public foul sewer under a separate connection. Thames Water has been consulted and has raised no objection to the proposed drainage arrangements, subject to standard conditions to confirm final connection points and capacities at detailed design stage.
- 14.4 The Council's Lead Local Flood Authority (LLFA) has reviewed the submitted strategy and confirmed that the approach is acceptable in principle, subject to conditions requiring detailed drainage design, management and maintenance arrangements to be secured prior to commencement of development.
- 14.5 On this basis, the proposals are considered to comply with all relevant local, regional and national planning policy relating to flood risk and drainage, and do not give rise to any unacceptable risk to future or existing occupiers.

Land Contamination

- 14.6 The site comprises previously developed land currently used as a surface-level public car park, and as such is not known to have accommodated any uses associated with high contamination risk. However, given the site's urban location and its historic use patterns, a Phase 1 Preliminary Risk Assessment (prepared by Ardent Consulting Engineers, October 2024) has been submitted in support of the application, in accordance with Policy D13 of the London Plan (2021) and Policy 33 of the Havering Local Plan (2021).

- 14.7 The report identifies a low to moderate risk of potential contamination from historic urban uses, including possible made ground and localised hydrocarbon residues from former vehicle movements. No significant contaminant linkages were identified at this stage. However, the report recommends that an intrusive site investigation be carried out to confirm ground conditions and assess any risks to human health, controlled waters, and construction workers.
- 14.8 The Council's Environmental Health Officer has reviewed the submission and raised no objection, subject to conditions requiring a Phase 1 and 2 site investigation, remediation strategy (if required), and a verification report to be submitted and approved prior to commencement of development. These standard conditions are necessary to ensure that the site is suitable for its proposed residential end use.
- 14.9 Subject to imposition of these conditions, officers are satisfied that the proposed development would not pose an unacceptable risk to human health or the environment. The proposal is therefore considered to comply with the relevant provisions of the NPPF (2024), London Plan Policy D13, and Local Plan Policy 33.

Sustainability & Energy Efficiency

- 15.1 The proposal has been developed to meet the strategic objectives of the London Plan (2021) and the Havering Local Plan (2021) in relation to sustainable design, energy efficiency, and carbon reduction. Policy SI 2 of the London Plan requires major developments to be net zero-carbon, with at least a 35% on-site reduction in regulated carbon emissions beyond Part L of the Building Regulations (2013), and the remainder to be offset through a financial contribution to the borough's carbon offset fund. Havering Local Plan Policy 35 similarly seeks to ensure that all new development minimises carbon emissions, maximises energy efficiency, and contributes to the borough's climate change objectives.
- 15.2 An Energy and Sustainability Statement (prepared by Etude, October 2024) has been submitted in support of the application. The statement confirms that the development adopts a 'Be Lean, Be Clean, Be Green' energy hierarchy, consistent with the London Plan's policy framework. The strategy includes enhanced building fabric insulation (Be Lean), energy-efficient mechanical and electrical systems (Be Clean), and the integration of renewable energy technologies (Be Green), including air source heat pumps for all houses and apartment blocks, and photovoltaic panels on the roofs of the apartment blocks.
- 15.3 The Energy Statement confirms that the development will achieve an overall on-site carbon emissions reduction of 41% beyond Part L 2013 through passive design and renewable technologies. The remaining regulated carbon shortfall will be addressed via a carbon offset payment to the Council in accordance with the borough's adopted price per tonne, to be secured through the Section 106 Agreement.

- 15.4 In addition to energy performance, the scheme incorporates a range of wider sustainability measures, including water-efficient fixtures and fittings (targeting 105L/p/d), sustainable drainage (as outlined in the submitted FRA), and enhanced biodiversity through native species planting, ecological enhancements, and improved green infrastructure. All homes have been designed to achieve high levels of daylight, good ventilation, and future adaptability, contributing to long-term resilience and occupant wellbeing.
- 15.5 Officers are satisfied that the development achieves a high standard of environmental sustainability and is compliant with the relevant policy requirements of the London Plan Policies SI 2, SI 5 and D6, and Havering Local Plan Policies 35 and 32.

Ecology and Biodiversity

- 16.1 The site comprises a hard-surfaced car park with limited existing vegetation, including a small number of scattered trees and low-value landscape features. The site is not subject to any statutory or non-statutory nature conservation designations and lies outside of any Site of Importance for Nature Conservation (SINC). As such, its existing ecological value is considered to be low.
- 16.2 In support of the application, the applicant has submitted a Preliminary Ecological Appraisal and a Biodiversity Net Gain (BNG) Assessment (prepared by Ecology Solutions, October 2024). The ecological appraisal confirms that no protected species or priority habitats are present on site and that the development is unlikely to give rise to any adverse ecological effects. The BNG Assessment has been prepared in accordance with the DEFRA metric and demonstrates that the proposed scheme will deliver a measurable net gain in biodiversity, in compliance with the requirements of the Environment Act 2021 and NPPF (2024).
- 16.3 The development incorporates a range of biodiversity enhancement measures, including native tree and shrub planting, wildflower-rich grassland, green infrastructure corridors, and integrated bat and bird boxes. The central landscaped area and reconfigured spur road incorporate permeable surfacing, SuDS features and soft landscaping designed to support habitat creation and ecological connectivity. Existing trees are to be retained where practicable and supplemented with additional planting to create a more robust and diverse green environment.
- 16.4 Policy G6 of the London Plan (2021) requires development to manage impacts on biodiversity and secure net gains where possible. Havering Local Plan Policy 30 similarly requires all development to enhance ecological resilience and incorporate biodiversity improvements proportionate to the scale and nature of development. Officers consider that the submitted information and proposed enhancements meet these policy objectives and will significantly improve the site's ecological function compared to the existing baseline.

- 16.5 A number of conditions have been recommended by The Council's Ecology Team to secure the implementation of the biodiversity enhancements and to ensure that final planting species and habitat types reflect those proposed within the BNG strategy.

Trees

- 16.6 An Arboricultural Impact Assessment (AIA) and Tree Protection Plan (prepared by Hayden's Arboricultural Consultants, October 2024) have been submitted as part of the application. The AIA identifies a total of 15 trees and groups on or adjacent to the site. While a small number of low-category trees are proposed for removal to facilitate development and access, the majority of higher-quality trees will be retained and protected during construction. Replacement tree planting is proposed at a ratio exceeding 2:1, using native and climate-resilient species to enhance canopy cover and long-term urban greening. Protective fencing and ground protection measures will be secured by condition in accordance with BS5837:2012. Officers are satisfied that the scheme achieves a balanced and policy-compliant approach to tree retention, removal and replacement, in accordance with London Plan Policy G7 and Havering Local Plan Policy 27.

Air quality

- 17.1 The site lies within the Havering Air Quality Management Area (AQMA), which covers the entire borough due to exceedances of national nitrogen dioxide (NO₂) and particulate matter (PM₁₀) objectives, primarily from traffic-related sources. In accordance with Policy SI 1 of the London Plan (2021) and Policy 33 of the Havering Local Plan (2021), the application is accompanied by an Air Quality Assessment (AQA) prepared by Air Quality Consultants (October 2024).
- 17.2 The assessment confirms that existing air quality at the site is within acceptable levels for residential use and that the development will not lead to any significant increase in pollutant concentrations either on-site or in the surrounding area. Vehicle trip generation is modest and anticipated to be lower than the existing car park baseline. All residential units will be fitted with low-NOx boilers or air source heat pumps, and the scheme incorporates sustainable travel measures and electric vehicle charging infrastructure to reduce future emissions.
- 17.3 The Council's Environmental Health Team has reviewed the submission and raised no objection, subject to the inclusion of standard conditions to manage construction dust and ensure implementation of a non-road mobile machinery (NRMM) emissions strategy during the construction phase.
- 17.4 The proposals are therefore considered acceptable with regard to air quality and comply with the requirements of the NPPF (2024), London Plan Policy SI 1, and Havering Local Plan Policy 33.

Secure by design.

- 18.1 In accordance with Policy D11 of the London Plan (2021) and Policies 7, 15 and 26 of the Havering Local Plan (2021), developments must incorporate

measures to design out crime and promote safe, inclusive environments. The applicant has engaged with the Metropolitan Police Designing Out Crime Officer (DOCO), and a formal consultation response was provided dated 23 January 2025. The Police have no objection to the proposed development, subject to the imposition of a Secured by Design (SBD) condition and the implementation of the site-specific recommendations provided.

18.2 The Police response acknowledges that early engagement took place with the applicant and design team, and that several principles of Secured by Design are already reflected in the submitted Design and Access Statement. Nonetheless, the DOCO has highlighted a number of areas where enhanced crime prevention measures should be incorporated, including:

- Robust 2.1m boundary treatments without footholds or climbing points.
- Controlled access vehicle and pedestrian gates with fob or proximity entry.
- Secure lobbies to apartment blocks with dual-door entry systems and encrypted fob access.
- PAS 24:2022 certified front doors, communal doors, and accessible windows.
- Secure external post boxes, smart meter placement, and CCTV to communal areas.
- Secure, well-lit and non-signposted cycle and refuse stores built to SBD standards.

18.3 The site lies within the St Andrew's Police Ward, where recent crime statistics (315 violence and sexual offences, 212 anti-social behaviour incidents, and 179 vehicle crimes in the past 12 months) indicate the importance of embedding preventative design measures from the outset. The proposals provide natural surveillance through active frontages and window placement, good lighting, and integrated landscaping that supports visibility and passive security.

18.4 A suitably worded planning condition is recommended, requiring that the development achieves full Secured by Design accreditation, with a certification of compliance to be submitted and approved prior to occupation. An informative is also recommended to encourage continued engagement with the DOCO during the detailed design and construction phases.

18.5 Subject to the imposition of this condition and implementation of the submitted design principles, the development is considered acceptable in terms of crime prevention and community safety and compliant with the relevant national, regional and local policy objectives.

19 EQUALITIES AND DIVERSITY

19.1 Section 149 of the Equality Act 2010, which came into force on 5th April 2011, imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

19.2 For the purposes of this obligation the term protected Characteristics includes: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

19.3 In recommending the application for approval, officers have had regard to the requirements of the Act and have concluded that a decision to grant planning permission for this proposed development will comply with the Council's statutory duty.

20 CIL and other Financial and Mitigation measures

20.1 The net additional floor space would be 3187m². The development would be liable for a Mayoral CIL at the rate of £25 per square metre amounting to £79,675 and Havering CIL at rate of £125 per square metre amounting to £398,375, subject to indexation. A request was made for a contribution to school places, however in the absence of a specific local policy such as the Planning Obligations SPD it would be difficult to justify such a contribution to school places.

20.2 The planning obligations recommended in this report have been subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the obligations are considered to have satisfied the following criteria:-

- (a) Necessary to make the development acceptable in planning terms;
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

21 Conclusions

21.1 Section 38(6) of the Planning and Compulsory Purchase Act, 2004 outlines that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

21.2 The outcome of the Framework paragraph 11 d) process above indicates that the decision should be taken in accordance with the development plan.

- 21.3 The proposed development seeks full planning permission for the redevelopment of a former public car park to provide 34 new residential dwellings, with associated access, car parking, landscaping and infrastructure. The scheme will contribute positively to housing delivery in a sustainable, accessible location within the urban area and makes efficient use of previously developed land in line with national, regional and local planning policy.
- 21.4 The principle of residential development is strongly supported by the National Planning Policy Framework (NPPF, 2024), London Plan Policies H1, D3 and H4, and Havering Local Plan Policies 3, 4 and 13, which promote housing growth on under-utilised brownfield land. The site is well connected to local amenities and transport infrastructure and represents a logical opportunity for residential intensification.
- 21.5 While the scheme does not include on-site affordable housing provision, this position is justified by a Financial Viability Assessment (prepared by Turner Morum), which has been subject to independent review on behalf of the Council. The assessment concludes that the development cannot viably support affordable housing at this stage without compromising deliverability. In accordance with the Mayor's Affordable Housing and Viability SPG, a late-stage review mechanism will be secured via the Section 106 Agreement to capture any uplift in viability prior to completion. Officers are therefore satisfied that the proposal accords with Policy H4 of the London Plan and Policy 4 of the Havering Local Plan.
- 21.6 The layout, scale and design of the development have been informed by engagement with Council officers and the Havering Quality Review Panel. The scheme responds positively to local context, delivers a legible and attractive streetscape, and provides a good standard of residential accommodation. The development will not result in material harm to the amenity of neighbouring occupiers in terms of daylight, sunlight, outlook or privacy.
- 21.7 Technical matters including transport and highways, flood risk, drainage, land contamination, energy, ecology and crime prevention have been fully assessed and found to be acceptable, subject to appropriate conditions. A condition is also recommended requiring the development to achieve Secured by Design certification in consultation with the Metropolitan Police, to support community safety objectives.
- 21.8 Overall, the proposals are considered to comply with the development plan when read as a whole, and there are no material considerations that would warrant refusal. The development will deliver significant public benefits through the provision of high-quality housing, regeneration of surplus Council land, and urban greening. As such, the application is recommended for approval, subject to conditions and the prior completion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) and all other enabling powers.

 <h2 style="margin: 0;">Havering</h2> <p style="margin: 0; font-weight: normal;">LONDON BOROUGH</p>	<p style="margin: 0;">Strategic Planning Committee</p> <p style="margin: 0;">8th May 2025</p>
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Application Reference:	P1633.24
Location:	Veolia ES (UK) Ltd Coldharbour Lane
Ward	RAINHAM AND WENNINGTON
Description:	Extension to the operational life of the landfill and composting facilities until the end of December 2029 and restoration of the land by 31st December 2031 (Amended description).
Case Officer:	MALACHY MCGOVERN
Reason for Report to Committee:	The application is within the categories which must be referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order.

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- 1.1 The current proposal to extend the life of the existing landfill site for a further 5 years i.e. until the end of December 2029, is necessary in order to complete the infill of the proposed landscaped mound, which requires a further 1 million cubic metres of non-hazardous waste. A further 2 years is required to restore the land to its intended form i.e. by the end of December 2031.
- 1.2 This existing operation was first granted planning permission in 1997 (having operated as a largely uncontrolled landfill site for many years) and then an extension to the period to complete the landform granted in 2012 as part of the larger waste activities on the wider site. Since then, the demand on recycling infrastructure has increased as public policy and legislation has advanced to require more sustainable use of resources and more sustainable waste management. The consequence of increased recycling and less waste going to landfill is that the anticipated timeframe for filling the existing landfill site has slipped, and an additional 5 years is required to complete the filling of the mound. The annual projected input is 200,000 cubic metres of waste which equates to 1 million cubic tonnes of waste after 5 years. The proposal is therefore considered acceptable and in line with the borough’s waste management strategy and sustainability goals as well as Joint Waste Development Plan for the East London Waste Authority Boroughs.

- 1.3 The proposed scheme to complete the filling of the existing mound and to enable reprofiling and greening of the site for use as public open space would represent a notable improvement in the visual amenity of the site and would also represent a more sustainable use of the land in the long run.
- 1.4 Given the proposal is a continuation of the existing landfill operation this would not cause additional material harm to local ecology and biodiversity nor would it cause additional unacceptable adverse impact on the natural environment. The proposal is sustainable in terms of transportation and would not have undue impact on the local highway network.
- 1.5 The recommended conditions and Heads of Terms would secure future policy compliance by the applicant on the site and ensure any unacceptable development impacts are mitigated.
- 1.6 Officers consider the proposal to be acceptable, subject to direction from the Mayor for London, the completion of a Section 106 legal agreement pursuant to Section 106 and Section 106A of the Town and Country Planning Act 1990 (as amended) and all other enabling powers to modify the obligations in the original Section 106 dated 12 July 2016 (as may be modified by any prior deeds of modification) and conditions.

2 RECOMMENDATION

- 2.1 Although the application is referable to the Mayor, the Mayor has confirmed by letter that the proposed development does not need to be referred back to the GLA at Stage 2 for any direction.
- 2.2 That the Committee resolve to GRANT planning permission subject to:
 - Prior to completion of a legal agreement to modify the Section 106 Agreement dated 12 July 2016 (as may be modified by any prior deeds of modification) to secure the following planning obligations:

Legal Costs, Administration and Monitoring

The Council's legal costs associated with the preparation of the planning obligation to be paid prior to completion of the deed and irrespective of whether the deed is completed; to pay the Council's administrative costs associated with monitoring compliance with the obligation terms and monitoring fees and contribution sums to be subject to indexation from the date of completion of the deed to the date of actual payment by applying the BCIS Tendered Price Index.

1. Extension of Operational Life and Restoration

- Extension of landfill and composting operations until **31 December 2029**;
- Full site restoration to be completed by **31 December 2031**.

2. Land Transfer Option to the Council

- Provision of land for a water sports facility, visitor centre, and associated uses;
- Location of future visitor centre to be agreed between the parties prior to transfer.

3. Provision of Visitor Car Parking

- Provision of visitor car parking to serve public access and the visitor centre, to be delivered in accordance with the approved Public Access Plan.

4. Waste Input and Settlement Monitoring

- Submission of six-monthly reports detailing waste inputs, settlement behaviour, landfill progression, and compliance with approved contours.

5. Revised Restoration and Public Access Plan

- Submission and approval of a new Restoration and Public Access Plan, to include:
 - Phased restoration schedule;
 - Delivery of public riverside pathways and recreational access;
 - Prioritisation of ecological and community areas.
 - Maintenance and management of the site and public access post aftercare

6. Green Travel Plan

- Continued implementation of the Green Travel Plan, limiting HGV movements to no more than 300 two way movements per day, and annual review of river transport alternatives.

7. Aftercare Management

- Delivery of aftercare obligations following restoration, with completion by **31 December 2031**.

8. Environmental Education Facility

- Provision and maintenance of a visitor centre or environmental education facility (the Gatehouse or alternative facility) during the Aftercare Period.

9. Public Access and Riverside Pathways

- Maintenance and delivery of new and existing public access routes, including the First, Second, and Third Riverside Footpaths, until the end of the Aftercare Period.

10. Brown Land (PLA Access Protection)

- Securing and protecting Port of London Authority (PLA) access rights over the Brown Land to facilitate river dredging and navigation rights.

12. Yellow Land (Nature Conservation Transfer)

- To incorporate the yellow land into the wider site including nature conservation and public access paths

13. Blue Land (Riverside Access Rights)

- Protection and maintenance of public rights of access over the Blue Land along riverside routes and footpaths.

14. Financial Bond and Insurance

- Provision of a financial bond to secure restoration, aftercare, and access obligations;
- Maintenance of public liability insurance for the duration of the Aftercare Period.

15. Monitoring Fees and Legal Costs

- Payment of the Council's reasonable legal costs and an annual monitoring fee of to cover the Council's compliance and enforcement functions.

2.3 That the Director of Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 8th November 2025 the Director of Planning is delegated authority to refuse planning permission or extend the timeframe to complete the legal agreement and grant approval.

2.4 That Director of Planning has delegated authority to issue the planning permission subject to the completion of the legal agreement and conditions to secure the following matters:

Conditions:

1. · Time Limit for Operations
2. · Approved Plans
3. · Restoration and Phasing Plan
4. · Noise Mitigation Scheme
5. · Dust and Air Quality Control
6. · Wheel Wash and Road Cleanliness
7. · Traffic Management
8. · Pest and Gull Management Plan
9. · Lighting Scheme
10. · Interim Seeding and Soil Management
11. · Soil Storage and Reuse
12. · Waste Type Restriction
13. · Unexpected Cessation of Operations
14. · Biodiversity Net Gain
15. · Habitat Management and Monitoring Plan (HMMP)
16. · Ecological Method Statement and Invasive Species Strategy
17. · Review and Update of CEMP and Site Management Plan
18. · Invertebrate Survey Strategy
19. · Final Landform and Surface Water Drainage Compatibility
20. · Non-Road Mobile Machinery (NRMM) Emissions Control

3 SITE DESCRIPTION

3.1 The application site is approximately 177 hectares in area and is located on the northern bank on the River Thames, just southwest of Coldharbour Lane in the south of the borough. The site is approximately 700m to the west of a large wetland area called Wennington Marshes nature reserve (SSSI). Access to Coldharbour Lane, where the application site is located, is 1.3km from the A13

(Rainham Bypass), which forms part of the strategic road network, via Ferry Lane. The access road connecting the site to Coldharbour Lane is an unadopted highway. To the south west of the site is the Momentum Logistics Park (former Freightmaster Estate) and to the south is the existing Veolia Materials and Plastics recycling facility.

- 3.2 The site is not located within a conservation area, and not in close vicinity of any Listed Buildings or buildings of heritage value however is located within an Archaeological Priority Area.
- 3.3 Due to the expansive marsh area surrounding the north of the site, the nearest residential properties to the application site are located approximately 1km to the south west across the River Thames in Erith. The nearest residents in Havering to the site are on Wennington Road some 1.5km away. The public transport accessibility of the site is PTAL 0 (Worst).
- 3.4 The site is located within a Strategic Industrial Location (Local Plan Policy 19) and within the Thames Policy Area (Havering Local Plan Policy 31) and within a Flood Zone 3a (high probability of flooding).
- 3.5 The site also falls within the Havering Site Specific Site Allocations DPD reference SSA17 – London Riverside Conservation park designation, and is located within the Rainham, Aveley and West Thurrock Marshes Landscape Character Area (LCA) of the Land of the Fanns Landscape Character Assessment (2016). The site is not located on Green Belt land.

4 BACKGROUND (Existing Site Operations)

- 4.1 This planning application, submitted by Veolia ES Cleanaway (UK) Ltd, seeks permission to extend the operational life of the existing landfill and composting facilities at Rainham Landfill, located at Coldharbour Lane, Rainham. The site has previously been granted planning permission (ref. P1566.12), which extended the period for waste disposal and other waste management activities to operate until 31 December 2024, with site restoration by 31 December 2026.
- 4.2 Due to significant changes in waste management practices—specifically increased recycling rates and reduced waste generation—there remains approximately 1.085 million cubic metres of landfill void capacity at Rainham in order to achieve the required landscaped mound finish. Consequently, the applicant proposes an extension of landfill and open windrow composting operations until 31 December 2029, with final restoration completed by 31 December 2031.
- 4.3 The applicant submits that the proposed extension is necessary for ensuring sustainable management of residual non-hazardous waste, achieving approved restoration contours, and delivering comprehensive site restoration. The continued operations would facilitate strategic waste disposal capacity for London and the wider region, supporting waste management practices aligned with the waste hierarchy principles. The applicant submits that furthermore, extending landfill operations at Rainham would avoid the environmental and logistical impacts associated with developing new landfill sites elsewhere.

- 4.4 Finally, the applicant submits that if the extension to the life of the existing landfill operation is not permitted, the site risks significant environmental issues, including increased leachate production, uncontrolled gas emissions, compromised landfill stability, and substantial limitations to habitat restoration and public amenity provision. The proposal therefore aims to avoid these negative impacts and deliver enhanced biodiversity outcomes, alongside high-quality amenity space integrated into the broader London Riverside Conservation Park initiative.

5 DESCRIPTION OF PROPOSAL

- 5.1 The submitted Planning Statement describes the proposal as follows:

The proposal consists of the following composite parts:

1. **Extension of Operational Life:**
 - Landfill operations to continue until 31 December 2029 (5 years).
 - Open windrow composting operations to continue concurrently until 31 December 2029.
 2. **Restoration Timeline:**
 - Completion of final site restoration by 31 December 2031.
 3. **Landfill Void Utilization:**
 - Use of the remaining landfill void capacity, approximately 1.085 million cubic metres, for residual non-hazardous waste disposal.
 4. **Restoration and Landscape Scheme:**
 - Achieving approved restoration contours to deliver a sustainable and stable final landform.
 - Comprehensive site restoration providing enhanced biodiversity, high-quality habitats, and public amenity space.
 5. **Environmental Safeguarding:**
 - Continued adherence to environmental controls to prevent leachate production, control landfill gas emissions, and maintain landfill stability.
 6. **Integration with Local Initiatives:**
 - Restoration to integrate with and enhance the London Riverside Conservation Park, improving local ecological connectivity and recreational amenities.
- 5.2 An Environmental Statement has also been submitted with the application and the main findings have been incorporated into the relevant planning considerations section below.

6 RELEVANT HISTORY

- 6.1 P1275.96 - Deposit of refuse materials through controlled landfill provision of material recovery facilities and creation of contoured landform and restoration scheme – Approved with conditions 14th February 1997.
- 6.2 P1566.12 - Planning application for the continuation of waste inputs and operation of other waste management facilities (materials recycling facility, waste transfer station, open air composting site and associated soil plant, gas engines, leachate treatment plant, and incinerator bottom ash processing) until

2024 and re-profiling of final contours – APPROVED with conditions on the 22nd September 2016.

7 CONSULTATIONS/REPRESENTATIONS

Rainham Veolia Landfill Pre-Application SPC meeting Thursday 5th December 2024

7.1 The following comments were made by Members of the SPC:

- To have confidence in any submission that Veolia is able to complete the landfill development in the timeframe. Reassurance about calculation, Members sought reassurance that this period of five years would be sufficient to complete landfill development.
- Question around negative effects of not completing landfill development. It was expected that the application would detail out such information.
- Wish to ensure that all safeguards as previously imposed on the permission through conditions and S106, including those in relation to pests, litter and condition of Coldharbour Lane are going to be adhered to, particularly given that there are newly completed employment uses in close proximity to the site and the continued recreational use of the area.

Planning Application Consultation Responses:

7.2 As part of this formal planning application, public consultation took place in accordance with statutory requirements on the 20th December 2024. This included a total of 63 letters sent to occupiers of neighbouring properties and a press advert published in Romford Recorder and site notices displayed outside the application site.

7.3 Responses from neighbours and 2 objections were received and can be summarised as follows:

- Concerns were raised by a resident regarding odour/ smells and air quality impacts arising from ongoing landfill and composting operations.

Officer response: *The submitted Environmental Statement includes an updated Air Quality Assessment, which confirms that emissions of dust, odour and other pollutants remain within acceptable levels. Existing mitigation measures, including odour management protocols, surface capping, and composting controls, are in place and will continue to be regulated under both planning conditions and the Environmental Permit issued by the Environment Agency. No significant adverse impacts on human health or amenity are predicted, and the proposal does not involve an intensification of operations. Planning conditions can be reviewed and updated to ensure continued compliance.*

- Adverse impact on the Strategic Industrial Location (SIL) at Momentum Business Park, undermining its ability to attract tenants and deliver jobs.

Officer response: *It is acknowledged that the landfill site lies adjacent to a newly developed SIL. The planning application does not propose any intensification of*

operations but rather allows for completion of previously approved works. The ES confirms no significant impact on adjacent land uses, and conditions can be imposed or updated to minimise any amenity effects. A Deed of Variation to the S106 will secure restoration commitments and provide certainty. The applicant has prioritised the infill and restoration of the land to the north of the Momentum Logistics Park in order to mitigate the impact see dragging ref: Restoration Phasing Plan – Drawing No. 3462-01-02

- Ongoing breaches of planning conditions and Section 106 obligations under previous permission P1566.12, including dust, odour, wheel washing and vermin control.

Officer response: The Council acknowledges past concerns. Through this application, conditions will be reviewed and updated to secure compliance with site management standards. Continued operation will be contingent on full compliance, with monitoring mechanisms linked to planning enforcement and the Environmental Permit.

- Poor maintenance of Coldharbour Lane, with mud and debris affecting access and site perception.

Officer response: The applicant has been reminded of their obligations and conditioned maintenance of Coldharbour Lane and wheel washing facilities will be re-emphasised in any approval.

- Operations generating seagulls and vermin that negatively affect the amenity and hygiene of adjacent industrial units.

Officer response: Additional controls will be reviewed in relation to gull and pest management and the applicant has agreed to consider further controls however the typical use of birds of prey is prohibited given the neighbouring marshes nature reserve and shooting is prohibited due to the airport flight path

. The existing ecological sensitivity of the area (due to SSSI proximity) requires a balanced approach, but a revised mitigation scheme can be secured by condition or legal agreement.

- Lack of a clear restoration and aftercare phasing plan, contrary to previously approved planning conditions.

Officer response: A restoration phasing plan and aftercare scheme will be required as a condition of approval. The absence of delivery to date will be addressed through enforceable triggers and monitoring. The final restoration deadline of 2031 will be formalised through the updated S106.

- Absence of updated environmental documents and waste forecasting data available on the planning portal, affecting transparency and ability to fully assess impacts.

Officer response: *The objectors have been advised that a full Environmental Statement and supporting technical material are publicly available. This ensures transparency and compliance with the EIA Regulations.*

- Concerns that continued operations are harmful to public health and well-being of future employees and users of the Thames Path.

Officer response: *The ES and supporting assessments confirm no significant health risks. Odour, noise and air quality controls remain enforceable and are managed under both planning and environmental permitting regimes. The approved restoration scheme will ultimately enhance environmental quality and provide future community benefit.*

- Failure to acknowledge or mitigate proximity to newly completed commercial development, contrary to Agent of Change principles and London Plan Policy E5.

Officer response: *It is acknowledged that the site context has changed since the original 2012 permission. This application is being assessed in light of updated London Plan policies including E5 and GG3. A coordinated approach between the applicant, SIL stakeholders, and the Council is encouraged, with mitigation secured where appropriate.*

- Objection to the principle of further landfill use given the waste hierarchy and updated evidence on capacity in the draft East London Joint Waste Plan (ELJWP).

Officer response: *While landfill is at the bottom of the waste hierarchy, the proposal does not seek new landfill capacity but allows for completion of an existing, engineered cell. The Joint Waste Plan's evolving evidence base will inform future allocations but does not preclude this transitional use.*

- Calls for immediate enforcement action and cessation of operations due to perceived unlawful activity post-December 2024.

Officer response: *The Council is assessing this application as a new full planning application, not as a minor amendment or variation. The legal and planning status of operations post-2024 will be regularised through this process. Should the application be refused, appropriate enforcement options will be considered.*

Internal Consultees

LBH Environmental Health (Noise & contamination) - No objections subject to conditions

LBH Business Development – No objection

LBH Regeneration – No objection

LBH Parks – No objection

LBH Environmental Health (Air quality) - No objections subject to conditions

LBH Highways - No objections subject to conditions

LBH Waste & Recycling - No objections subject to conditions

Place Services (Ecology) - No objections subject to conditions

LBH Community Safety – No objection

LBH Place Services (Landscape) - No objections subject to conditions

External Consultees

East London Waste Authority – No objection

Brentwood Borough Council – No objection

Thurrock Borough Council – No objection

Historic England (GLAAS) - No objections

Environment Agency - No objections subject to conditions

Essex & Suffolk Water – No objection

Ministry of Defence Safeguarding – No objection

Natural England – No objection subject to conditions

RSPB – No objection

Port of London Authority – No objection

London Fire (LFEPA) - No objections subject to conditions

Thames Water - No objections subject to informatives

Transport For London (TFL) - No objection

Greater London Authority –No strategic issues raised – local authority can determine the application without further reference to the GLA.

8 RELEVANT POLICIES

8.1 The following planning policies are material considerations for assessment of the application: Government Planning Policy

National Planning Policy Framework (2024)

Relevant themes:

- Achieving sustainable development:
- Plan-making
- Decision-making
- Building a strong, competitive economy
- Promoting healthy and safe communities
- Promoting sustainable transport
- Making effective use of land
- Achieving well-designed places
- Meeting the challenge of climate change, flooding, and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

London Plan (2021)

Relevant policies:

- GG1 - Building strong and inclusive communities
- G1 – Green Infrastructure
- G6 – Biodiversity and access to nature
- GG2 - Making the best use of land
- GG5 – Growing a good economy
- D2 - Infrastructure requirements for sustainable densities
- D3 - Optimising site capacity through the design-led approach
- D11 - Safety, security, and resilience to emergency
- D12 - Fire safety
- D14 – Noise
- E4 - Land for Industry, Logistics, and Services to Support London's Economic Function
- SI 1 - Improving air quality
- SI 2 - Minimising greenhouse gas emissions
- SI 3 - Energy Infrastructure
- SI 7 - Reducing waste and supporting the circular economy
- SI 8 - Waste capacity and net waste self-sufficiency
- SI 9 - Safeguarded waste sites
- SI 12 - Flood risk management
- SI 13 - Sustainable drainage
- G5 - Urban greening
- G6 - Biodiversity and access to nature
- T1 - Strategic approach to transport
- T3 - Transport capacity, connectivity, and safeguarding

- T4 - Assessing and mitigating transport impacts
- T7 - Deliveries, servicing, and construction
- T9 - Funding transport infrastructure through planning
- DF1 - Delivery of the Plan and Planning Obligations

Havering Local Plan (2016–2031, adopted 2021)

Relevant policies:

- Policy 19 – Business Growth
- Policy 23 – Transport Connections
- Policy 27 – Landscaping
- Policy 28 – Heritage Assets
- Policy 29 – Green Infrastructure
- Policy 30 – Biodiversity and Geodiversity
- Policy 31 – Rivers and River Corridors
- Policy 33 – Air Quality
- Policy 34 – Managing Pollution
- Policy 35 – Waste Management
- Policy 36 – Low Carbon Design and Renewable Energy

Additional Relevant Guidance

Site Specific Allocations Development Plan Document – Adopted 2008

National Planning Policy for Waste (NPPW, 2014):

Paragraphs relating to ensuring landfill and waste proposals align with the waste hierarchy and sustainable restoration.

Joint Waste Development Plan for East London (DPD, 2012):

- 8.2 In 2012 the Council adopted the Joint Waste Development Plan, which was developed in collaboration with Barking and Dagenham, Newham, and Redbridge.
- 8.3 The purpose of the Joint Waste Plan is to set out a planning strategy for sustainable waste management which enables the adequate provision of waste management facilities (including disposal) in appropriate locations for municipal and commercial and industrial waste, having regard to the London Plan Borough level apportionment and construction, excavation and demolition and hazardous wastes.
- 8.4 The Joint Waste Plan forms part of the planning policy suite of documents for each borough.
- 8.5 The East London Waste Plan Evidence Base (2022) has been produced as the first step towards creating a new Joint Waste Plan. The relevant sections are as follows:
- W1 – Sustainable Waste Management
 - W2 – Waste Management Capacity, Apportionment & Site Allocation

- W4 – Disposal of inert waste by landfilling
- W5 – General considerations with regard to waste proposals

PLANNING CONSIDERATIONS

9.1 The main planning issues raised by the application to be considered are:

- 1) Principle of Development
- 2) Landscaping
- 3) Neighbouring Amenity (Light Loss and Privacy)
- 4) Environmental Impacts (Noise, Dust & Air Quality)
- 5) Impact on the Highway network
- 6) Sustainability/ Energy
- 7) Archaeology
- 8) Ecology & Biodiversity
- 9) Flood Risk
- 10) Environmental Statement Summary
- 11) Other Issues (Health)
- 12) S106

PRINCIPLE OF DEVELOPMENT

- 9.2 The NPPF 2024 places a presumption in favour of sustainable development, highlighting three overarching objectives: economic, social, and environmental.
- 9.3 Although the landfill facility is established under permission ref. P1566.12, this permission expired in December 2024. Therefore, reassessment against current development plan policies and NPPF 2024 criteria is required.
- 9.4 Sustainable Development (Paragraphs 7-14): The NPPF 2024 emphasizes sustainable development. Extending the landfill operation would support sustainable waste management by responsibly utilizing existing landfill voids, thereby achieving economic, social, and environmental objectives.
- 9.5 Building a Strong, Competitive Economy (Paragraphs 85-89): The NPPF 2024 supports economic development and job creation. Continued landfill operations maintain strategic waste infrastructure necessary for regional economic stability.
- 9.6 Promoting Healthy and Safe Communities (Paragraphs 96-108): The landfill's proper management and eventual restoration will enhance community safety, mitigate health risks, and improve public accessibility and recreation, aligning with the NPPF's community-focused objectives.
- 9.7 Making effective use of Land (Paragraphs 124-130): The landfill proposal aligns with NPPF guidance on effective land utilization by maximizing the existing landfill void and avoiding the need to establish new landfill sites elsewhere.

- 9.8 Achieving Well-Designed Places (Paragraphs 131-141): Restoration activities will deliver improved landscapes and biodiversity enhancements, contributing positively to local character and environmental aesthetics as envisaged by the NPPF.
- 9.9 Conserving and Enhancing the Natural Environment (Paragraphs 187-201): Ongoing landfill operations and restoration practices ensure compliance with environmental safeguards, contributing positively to local biodiversity and habitat enhancement.
- 9.10 At a regional level, London Plan policy SI 8 'Waste capacity and net waste self-sufficiency' specifically supports maintaining strategic waste facilities. This proposal continues an existing landfill site, ensuring that London's waste management needs are sustainably met.
- 9.11 Havering Local Plan Policy 35 'Waste Management' and Joint Waste Development Plan Policy W4 explicitly support landfilling where necessary to achieve restoration and after-use objectives. The proposed extension aligns with these strategic aims by using existing landfill void space effectively.
- 9.12 The application site lies within the area designated under Policy SSA17 of the Havering Site Specific Allocations DPD, which allocates the former Rainham Landfill for restoration to a public open space and recreational asset, supporting ecological, leisure and environmental education objectives. Policy SSA17 seeks the creation of "a high quality, sustainable public open space providing opportunities for informal recreation, biodiversity enhancement, and educational activities," with a phased programme of public access delivered across the site as restoration progresses.
- 9.13 In considering the current proposal, it is recognised that a failure to complete the approved landfill restoration would result in a sub-optimal landform and significantly impair the site's long-term ability to deliver the quality and extent of public open space envisaged by Policy SSA17. A partly-restored site would undermine the policy objectives of ecological enhancement, public accessibility, and recreational provision.
- 9.14 The proposed extension of time to allow for the continued operation of landfill and composting activities until 31 December 2029, with final restoration completed by 31 December 2031, is therefore considered acceptable in planning terms. The extension would enable the delivery of the desired restoration contours and landform necessary to create a sustainable, accessible public open space, in line with the aspirations of Policy SSA17 and the wider London Riverside regeneration framework.
- 9.15 In summary, the proposals are considered to be in line with the policies of the NPPF 2024, London Plan 2021, Havering Development Plan 2021 and with the Joint Waste Development Plan for the East London 2012. The proposal is therefore acceptable in principle subject to satisfying other relevant policies of the development plan.

LANDSCAPING

- 9.16 The application has been accompanied by a Landscape and Visual Impact Assessment (LVIA) which updates the original 2012 LVIA submitted in support of the recently expired permission. The updated LVIA considers changes to the baseline conditions, including more recent photographic evidence and planning context, and assesses the effects of the proposed five-year extension to landfill operations and associated restoration to 2031.
- 9.17 The site's existing landform and visual appearance are significantly influenced by ongoing landfill and associated waste management activities. The site currently exhibits an unfinished landform, characterised by varied contours, elevations, and exposed operational infrastructure.
- 9.18 The approved restoration contours for the landfill site, established under permission ref. P1566.12, define a domed final landform to ensure surface water runoff management and stability, thus reducing risks associated with leachate generation and landfill gas management. The applicant's submitted restoration drawings (Drawings 3462-01-06 and 3462-01-07) illustrate pre-settlement and post-settlement contours, respectively. The approved restoration profile indicates final post-settlement elevations reaching up to approximately 35 metres AOD (Above Ordnance Datum) at the site's highest central points, grading gently downwards towards the site boundaries and riverbank.
- 9.19 At present, deviations from the approved pre-settlement landform have occurred locally due to operational constraints. The proposed development seeks to regularise these deviations and deliver the previously approved landform within an extended operational timeframe. This is necessary because approximately 1.085 million cubic metres of landfill void remain to be filled, a consequence of reduced residual waste volumes available for landfill disposal over recent years.
- 9.20 The application proposes no changes to the maximum height or the fundamental profile previously approved, instead focusing solely on delivering the already consented restoration contours through additional landfill activities extended to December 2029, with final restoration by December 2031. Importantly, the proposal does not seek to increase landfill heights beyond those approved previously.
- 9.21 The submitted Landscape and Visual Impact Appraisal (LVIA) accompanying the application assesses visual impacts and concludes limited additional visual effects due to the proposed time extension, largely attributed to the retention of existing landfill infrastructure and operational patterns rather than any significant new structures or landform modifications. Views of landfill operations are predominantly distant and intermittent, limited mainly to users of the adjacent public footpath along the Thames riverside and longer-range viewpoints from elevated positions in Erith, approximately 930m south-west across the River Thames.
- 9.22 It is considered that the visual impacts associated with continued landfill operations are moderate and localised in nature, remaining consistent with current conditions experienced at and around the site. Furthermore,

continuation of landfilling activity is critical to achieving the final domed landform as consented, which is essential for safe and sustainable management of surface water, leachate, landfill gas, and long-term landscape stability.

- 9.23 Upon completion of landfill operations, the proposed restoration scheme would result in substantial landscape improvements, including the creation of and substantially enhanced open space integrated with the wider London Riverside Conservation Park. This restored landscape would provide measurable biodiversity net gain exceeding 10% and will significantly enhance public access, local ecology, and recreational value.
- 9.24 Overall, the landscape impacts of extending landfill operations by five years are deemed acceptable, given the strategic necessity of completing the consented restoration profiles. Subject to appropriate conditions ensuring timely restoration delivery and robust site management, the proposed development aligns with London Plan Policies G5 and G6 and Havering Local Plan Policies 27 (Landscaping), 29 (Green Infrastructure), and 30 (Biodiversity and Geodiversity). The proposed continuation and finalisation of the landfill operation is therefore acceptable in landscape terms.

IMPACT ON AMENITY

- 9.25 Policies D3, D6 of the London Plan 2021 requires development to protect, and where possible improve, the amenity of surrounding existing and future residents as well as the amenity of the surrounding public realm.
- 9.26 As stated above, the application site is located some 1km away from the nearest residential receptors which are on the south side of the River Thames and some 1.5km away from the nearest Havering residential receptors to the north of the site. The proposal, given these significant separation distances is not considered to cause any substantial harm to nearby residential amenity.
- 9.27 The application site adjoins the Momentum Freightmaster site to the south, an established commercial operation. Representations have been received from Momentum raising concerns about potential impacts associated with the continued landfill operations, including odour, pests, noise, dust and general disturbance affecting the operation of their business.
- 9.28 Impacts on neighbouring commercial premises are not directly covered by Havering Local Plan Policy 7, which relates to the protection of residential amenity. However, it remains necessary to consider general planning principles to ensure that neighbouring uses are not unacceptably harmed. Environmental matters such as pests, odour, dust and waste management are primarily regulated through the site's Environmental Permit issued by the Environment Agency, which provides controls over operational emissions.
- 9.29 It is acknowledged that since the original permission, the operational activity of Momentum Freightmaster adjacent to the landfill boundary has increased. The continued operation of the landfill could, without appropriate management, give rise to environmental impacts affecting nearby businesses. To provide additional local safeguards, planning conditions and obligations within the

Section 106 Agreement are proposed, requiring the continuation of the Odour Management Strategy, Waste Input Monitoring, and Aftercare Management Plans.

- 9.30 Overall, with the safeguards provided by the Environmental Permit and the additional planning controls proposed, it is considered that the development would not result in unacceptable impacts on neighbouring commercial operators. The proposal would remain consistent with the relevant provisions of the London Plan, national planning policy on environmental protection, and local planning principles.

ENVIRONMENTAL IMPACTS (NOISE, DUST, AIR QUALITY)

Noise

- 9.31 Havering Local Plan 2021 policy 33 'Air Quality' and policy 34 'Managing Pollution' set out the requirements for new development with regard to acceptable environmental impacts.
- 9.32 A Noise Impact Assessment has been submitted in support of the application. The assessment considers the likely effects associated with the proposed five-year extension of landfill and composting operations at the Rainham Landfill site. The assessment includes baseline noise monitoring, identification of the nearest noise-sensitive receptors (including residential areas in Erith, Wennington and Rainham), and comparison of predicted operational noise levels with relevant criteria.
- 9.33 The methodology follows recognised standards including BS 4142:2014+A1:2019 and considers both day and night-time operational periods. It is noted that no material changes to the type or intensity of activities are proposed; rather, the existing noise environment would be prolonged for an additional five years.
- 9.34 The assessment concludes that operational noise levels from the continued use of the landfill and composting facility would remain below the threshold of significance at all sensitive receptors. The predicted rating levels are considered to result in *low or negligible impacts* when assessed against the prevailing background noise levels. Mitigation measures are already in place (e.g., controlled operational hours, bunding, and distance to receptors), and no additional measures are considered necessary. No significant cumulative noise effects have been identified.
- 9.35 It is therefore considered that the proposal complies with London Plan Policy D13 (Agent of Change) and Policy D14 (Noise), which seek to manage noise impacts through early identification and design mitigation. The proposal also aligns with Havering Local Plan Policy 33 (Air Quality and Noise), which seeks to avoid significant adverse impacts on health and quality of life from noise-generating development. Given the limited operational changes and the temporary nature of the time extension, the proposal is considered acceptable in terms of noise and would not give rise to any unacceptable impacts on residential amenity or sensitive ecological receptors. In respect to 'agent of

change' the proposals are the continuation of an existing use and not proposing a new use in this location. Also the nature of the adjoining uses such as at the now Momentum Logistics Park have not changed and are still used for warehousing and industry, thus the impacts are not significantly different.

Air Quality

9.36 London Borough of Havering was declared an Air Quality Management Area in 2006. An Air Quality Assessment (AQA) has been submitted in support of the application, which evaluates potential air quality impacts associated with the proposed five-year extension of operational activity at Rainham Landfill. The site lies within an Air Quality Management Area (AQMA) designated by the London Borough of Havering due to exceedances in nitrogen dioxide (NO₂) and particulate matter (PM₁₀), primarily from road traffic sources.

9.37 The assessment uses detailed dispersion modelling to quantify potential impacts from both on-site operations and associated traffic. Receptors assessed include residential properties in Rainham, Wennington and Erith (located approximately 900m to 1.5km from the site), and ecological receptors within the adjacent Inner Thames Marshes SSSI and RSPB reserve.

9.38 Road Traffic Emissions

The development would not alter the existing number or routing of HGVs. The current average traffic flow is approximately:

- 100 HGV movements per day (50 in / 50 out) associated with landfill operations.
- An additional 30 HGV movements per day related to the composting facility.

9.39 No increase in daily vehicle numbers is proposed. These levels are consistent with those previously assessed and permitted under the extant planning consent.

Modelled concentrations of NO₂ and PM₁₀ at worst-case receptor locations were predicted to be:

- NO₂ annual mean: 24.8–28.5 µg/m³ (well below the 40 µg/m³ objective)
- PM₁₀ annual mean: 17.2–20.1 µg/m³ (below the 40 µg/m³ objective)
- Daily mean PM₁₀ exceedances: <10 days/year above 50 µg/m³ (threshold is 35 days)

9.40 These results indicate that the proposal would not result in new exceedances or significant changes in pollutant concentrations.

Composting and Bioaerosols

9.41 The open windrow composting facility remains in place and is proposed to operate for the same five-year extended period. Bioaerosol concentrations have been assessed based on Environment Agency guidance. The nearest residential receptor is over 900m away (in Erith), while the nearest ecological receptor (SSSI) is approximately 200m away.

- 9.42 Modelling and risk assessment confirm that bioaerosol levels would remain within acceptable limits, particularly as operational controls (e.g. turning restrictions, windrow spacing, and on-site irrigation) would continue to be enforced. No additional mitigation is considered necessary.
- 9.43 The assessment identifies and evaluates the potential impacts from both road traffic emissions and on-site activities, including ongoing waste operations and the composting facility. Baseline air quality data, including recent monitoring results, have been used alongside dispersion modelling to assess impacts at the nearest human receptors (residential areas in Wennington, Rainham and Erith), as well as ecological receptors including the adjacent SSSI and RSPB reserve.
- 9.44 The AQA confirms that no change in the volume or nature of vehicle movements is proposed, and there are no alterations to the existing waste throughput or operational practices. As such, emissions from traffic and on-site operations are expected to remain consistent with the current consented use.
- 9.45 Predicted concentrations of NO₂ and PM10 at identified receptors remain below the relevant air quality objectives, both for human health and ecological protection. The continued operation of the composting facility has also been assessed, with bioaerosol risk evaluated using Environment Agency guidance. The assessment concludes that there would be no significant risk to health or amenity, and existing control measures remain adequate.
- 9.46 It is considered that the proposed development complies with the air quality objectives set out in London Plan Policy SI 1 (Improving air quality), which requires developments to be air quality neutral and to minimise exposure to poor air quality. The proposal also complies with Havering Local Plan Policy 33 (Air Quality and Noise), which seeks to avoid significant adverse impacts on air quality, particularly within AQMAs.
- 9.47 Further, the proposal is consistent with the aims of the Havering Air Quality Action Plan (2018–2023) and the Mayor of London’s Air Quality Strategy, which seek to reduce emissions from waste and transport sources. While the AQA indicates that the development is not required to undertake a formal air quality neutral assessment (as there is no material increase in emissions), the proposal is considered to be consistent with the principle of minimising emissions and exposure.
- 9.48 As such, the proposed development is not considered to result in any unacceptable impact on air quality and would not hinder the borough’s objectives to improve public health or meet its legal air quality obligations.
- 9.49 Havering Environmental Health Team advised that the proposal is considered acceptable in amenity terms subject to a number of noise, dust, air quality and excess emissions planning conditions.

HIGHWAYS & PARKING

- 9.50 The NPPF emphasizes the role transport policies have to play in achieving sustainable development and stipulates that people should have real choice in how they travel. The London Plan seeks to shape the pattern of development by influencing the location, scale, density, design and mix of land uses such that it helps to reduce the need to travel.
- 9.51 The site is located within an area with a public transport accessibility (PTAL) rating of 0 (worst), with no convenient pedestrian access to bus connections or train station.
- 9.52 A Transport Statement (TS) has been submitted in support of the proposal to extend the operational life of the landfill and composting facility for a further five years, to 2029, with restoration by 2031. The Statement confirms that no physical changes are proposed to site access arrangements, routing, or vehicle numbers. Coldharbour Lane will remain the primary access route, linking the site to the A13 via Ferry Lane approximately 2.5km to the north. The lane also serves a number of commercial and waste-related premises, including the Freightmaster Estate (now Momentum) and adjacent recycling facilities.
- 9.53 Vehicular access is already established and accommodates Heavy Goods Vehicles (HGVs) safely and efficiently. The continued operation of the site is not anticipated to introduce additional pressure on the local highway network. Existing operational volumes will be maintained, with a typical daily profile of:
- 100 HGV movements/day associated with landfill operations (50 in / 50 out), and
 - 30 HGV movements/day associated with the composting facility (15 in / 15 out).
- 9.54 This level of traffic remains within the capacity of the local road network and has previously been assessed as acceptable under the extant planning permission. It is considered that the proposal continues to meet the requirements of London Plan Policy T4, which seeks to ensure that developments do not result in unacceptable impacts on highway capacity, safety, or operational resilience. The TS notes that operational traffic is typically distributed across the working day and does not concentrate during peak hours, thereby minimising disruption to other road users.
- 9.55 The site also benefits from proximity to an existing jetty on the River Thames, which enables the importation of waste by barge. While the modal share remains modest, the retention of river access is consistent with London Plan Policy T7, which supports the safeguarding and increased use of wharves to reduce the number of freight trips by road. It is noted that the extension of time would continue to support operational flexibility and modal shift potential, in line with this objective.
- 9.56 Swept path analysis confirms that the access arrangements can continue to accommodate large vehicle movements safely. No alterations to the highway network, junction design, or visibility splays are required. The proposal is therefore considered consistent with Havering Local Plan Policy 23, which

supports development that provides safe, direct, and legible access to the highway network, and with Policy 24, which relates specifically to waste facilities and their need to demonstrate sustainable and well-managed transport arrangements.

- 9.57 There are no reported highway safety concerns associated with the site access, and no accidents of note have occurred that would indicate any current or future risk arising from the continuation of landfill or composting operations. Havering Highways and Transport Teams and Transport For London have been consulted on the scheme and have no objection.
- 9.58 The proposed extension of time would not result in any intensification of traffic or change to existing access arrangements. The development is considered to maintain a safe and sustainable transport profile and would not result in any unacceptable impact on highway capacity, safety, or amenity. It is therefore considered that the proposal complies with London Plan Policies T4 and T7 and Havering Local Plan Policies 23 and 24, and is consistent with the objectives of the Mayor's Transport Strategy to promote efficient freight movement and protect highway efficiency and safety.

SUSTAINABILITY / ENERGY

- 9.59 At national level, the NPPF sets out that planning plays a key role in delivering reductions to greenhouse gas emissions, minimising vulnerability and providing resilience to climate change. The climate change policies as set out in Chapter 9 of the London Plan, policies of the Havering Local Plan 36 'Low Carbon Design & Renewable Energy' collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions.
- 9.60 The proposed development seeks a five-year extension to the operational life of the existing landfill and composting facility at Rainham, with completion of restoration by 2031. As the proposal does not involve any new built development or permanent above-ground structures, there is no requirement for submission of a formal Energy Strategy or BREEAM assessment. However, wider sustainability objectives remain relevant, particularly in relation to minimising environmental harm, promoting resource efficiency, and delivering a long-term beneficial after-use of the site.
- 9.61 The landfill facility forms part of the Borough's safeguarded waste infrastructure and contributes to regional self-sufficiency in waste management, consistent with the circular economy principles set out in London Plan Policy SI 7 (Reducing waste and supporting the circular economy). The continuation of operations on an existing, well-established site avoids the need for new land take or construction, thereby supporting efficient use of land and embedded energy.
- 9.62 The associated composting facility supports organic waste recovery and diversion from landfill and incineration, thereby contributing to reduced greenhouse gas emissions over the life of the project. The retention of this facility until 2029 supports the waste hierarchy and aligns with London Plan

Policy SI 2 (Minimising greenhouse gas emissions) and SI 8 (Waste capacity and net self-sufficiency).

- 9.63 Operational energy use is expected to remain broadly consistent with current baseline levels. On-site energy generation continues via the existing landfill gas engines, which capture methane emissions for conversion to electricity. This supports carbon reduction and energy recovery goals in line with Havering Local Plan Policy 33 (Air Quality and Noise) and the Mayor of London's Environment Strategy, which promotes decentralised energy where feasible.
- 9.64 The restoration scheme proposes a mix of biodiverse habitats, grassland, and wetland features. These are designed to enhance ecosystem resilience, contribute to carbon sequestration, and support local biodiversity networks. These outcomes contribute positively to climate adaptation objectives and wider sustainability targets.
- 9.65 Although the proposal does not involve new built development, it supports several key sustainability principles through the continued operation of an existing facility, diversion of organic waste through composting, on-site energy recovery via landfill gas, and the delivery of a multi-functional restored landscape. The proposal is therefore considered to comply with London Plan Policies SI 2, SI 7 and SI 8, as well as the relevant objectives of the Havering Local Plan relating to sustainable resource use and environmental enhancement.

ARCHAEOLOGY

- 9.66 Policy 28 'Heritage Assets' of the Havering Local Plan 2021 states that the council recognises the significance of Havering's heritage assets and further at part (vi) will support well designed and high-quality proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting.
- 9.67 The application site lies within an area of archaeological interest, with the Rainham, Wennington and Aveley Marshes historically associated with prehistoric, Roman, and later activity due to their proximity to the River Thames. However, the proposed development relates solely to the extension of time for ongoing waste disposal operations within an already engineered and operational landfill site.
- 9.68 No new excavation, groundworks or construction activities are proposed beyond those already permitted. The remaining activity involves the controlled placement of waste material to achieve final restoration contours within the central part of the site, which has already been substantially disturbed through historic landfill operations.
- 9.69 As such, it is considered that the proposal would not give rise to any new archaeological impacts. There would be no further ground disturbance within previously undisturbed strata and therefore no potential to affect any buried heritage assets. The proposal is consistent with London Plan Policy HC1

(Heritage conservation and growth) and Havering Local Plan Policy 30 (Heritage Assets), both of which seek to protect the significance of archaeological resources.

- 9.70 Given the previously disturbed nature of the site and the absence of any proposed excavation, it is not considered necessary to secure any archaeological mitigation or monitoring. Historic England (GLAAS) and the Greater London Archaeological Advisory Service would not typically be consulted in such circumstances unless new intrusive works are proposed.
- 9.71 The proposal would not involve any further ground disturbance beyond the engineered landfill operations already undertaken. As such, it is considered that there would be no impact on archaeological assets, and no further assessment or mitigation is required. The development is considered acceptable in archaeological terms and compliant with the relevant provisions of the London Plan and the Havering Local Plan.

ECOLOGY AND BIODIVERSITY

- 9.72 Policy 30 Biodiversity & Geodiversity of the Havering Local Plan seek to safeguard ecological interests and wherever possible, provide for their enhancement. The scheme is expected to deliver a biodiversity net gain.
- 9.73 An updated Ecological Impact Assessment (EclA) has been submitted as part of the Environmental Statement in support of the application. The proposed development, which seeks a five-year extension of landfill and composting operations within the existing operational footprint, does not involve any new land take or excavation into previously undisturbed areas. As such, the baseline conditions are already substantially altered, and the site largely comprises engineered landform, with areas of ephemeral vegetation, neutral grassland, scrub, ditches and artificial waterbodies.
- 9.74 The application site lies adjacent to the Inner Thames Marshes Site of Special Scientific Interest (SSSI), which forms part of the wider RSPB Rainham Marshes reserve and supports a diverse assemblage of habitats and species. The assessment confirms that the proposed development would not result in any direct impact on the SSSI, nor would it affect its qualifying features. Potential indirect effects such as dust, noise, and lighting have been assessed as negligible, owing to the continuation of embedded mitigation measures already in place under the current operational regime, the temporary nature of the extension, and the separation distance of approximately 100–150 metres between the active working area and designated site boundary.
- 9.75 Surveys have been undertaken to establish the ecological baseline, with no evidence of adverse effects on protected species. The habitat types present on-site are predominantly of low intrinsic ecological value, consistent with the disturbed character of the landfill. Nonetheless, features such as field margins, ditches and transitional habitats have the potential to support invertebrates, ground-nesting birds and amphibians. The proposed continuation of existing operational practices, which already incorporate good environmental

management, is not considered likely to lead to any significant effects on these species.

- 9.76 The site restoration scheme, which would be implemented following completion of operations in 2031, has been designed to deliver a measurable biodiversity net gain, in line with the requirements of London Plan Policy G6, which seeks to enhance biodiversity and secure ecological resilience. The final restored landform would comprise approximately 12 hectares of species-rich neutral grassland, 8 hectares of wet grassland and marginal wetland, new open water features, scrub planting, and hedgerow enhancement. These works would enhance habitat connectivity with the adjacent SSSI and support strategic green infrastructure objectives, consistent with London Plan Policy G1 and Havering Local Plan Policies 18 and 27.
- 9.77 The submitted restoration scheme forms a key component of the proposal and is designed to deliver long-term biodiversity net gain (BNG), in accordance with national policy and London Plan requirements. The restoration will create a mosaic of habitats, including:
- 12 hectares of lowland meadow and species-rich neutral grassland;
 - 8 hectares of wet grassland and marginal wetland habitat;
 - New open water features and ditches;
 - Scrub and hedgerow planting; and
 - Enhanced habitat connectivity with the adjacent SSSI and Wildspace landscape.
- 9.78 A Biodiversity Net Gain (BNG) assessment using the Defra Metric has been undertaken and confirms a net gain in excess of 10% in habitat units and 15% in hedgerow units relative to the existing site baseline. These outcomes meet the requirements of paragraph 180 of the NPPF, which expects development to secure net gains in biodiversity, and align with the Council's broader green infrastructure and climate adaptation goals.
- 9.79 Long-term management of the restored habitats would be secured through an aftercare and monitoring plan, with a minimum 30-year commitment to habitat establishment and maintenance. This approach is consistent with current national guidance and the emerging requirements of the Environment Act 2021.
- 9.80 The proposal would not result in any adverse effects on designated ecological sites or protected species, and would deliver a high-quality restoration scheme that secures a measurable biodiversity net gain. The development is therefore considered acceptable in ecological terms and consistent with the relevant provisions of the London Plan, Havering Local Plan, and national planning policy relating to biodiversity, ecological enhancement and strategic green infrastructure.

FLOOD RISK

- 9.81 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems.
- 9.82 Policy SI 13 of the London Plan stresses that development should utilise sustainable urban drainage systems (SuDS) and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. Information on how the drainage strategy will reduce discharge rates to the greenfield runoff rate is required. The attenuation should be provided in above-ground green SuDS where possible, which will also provide additional amenity and biodiversity benefits. Commitment to the inclusion of rainwater harvesting would be required.
- 9.83 In terms of local planning policies, policy 32 'Flood Management' states that 'the council will support development that seeks to avoid flood risk to people and property and manages residual risk by applying the Sequential Test and, if necessary, the Exception Test as set out in the NPPF. The Council's Strategic Flood Risk Assessment should be used as a starting point regarding local flood risk guidance. In addition to the requirements set out in the NPPF, the Council will require site-specific flood risk assessments for development on:
- i. Sites where drainage problems have been identified by the Council;
 - ii. The Washlands Flood Storage Area (FSA); and
 - iii. Sites deemed necessary by the Council as a Lead Local Flood Authority.
- 9.84 The application site lies within Flood Zone 3 as identified by the Environment Agency, indicating a high probability of flooding. However, the site benefits from existing flood defences and is covered by an Environmental Permit which governs water management, including leachate control and surface water drainage.
- 9.85 The proposed development relates solely to an extension of time for existing landfill and composting operations and does not involve any changes to the site footprint, operational processes, or surface water regime. As such, there would be no increase in impermeable area or alteration to runoff rates.
- 9.86 The Environmental Statement confirms that the continued operations would not increase the risk of flooding on- or off-site, and that the current drainage and environmental control measures would remain in place throughout the extended operational period. These include surface water management infrastructure, bunding, and controlled discharge points regulated under permit.
- 9.87 The proposal is therefore considered to comply with the requirements of London Plan Policy SI 12 (Flood risk management) and SI 13 (Sustainable drainage), as well as Havering Local Plan Policy 32 (Flood Risk), all of which require developments to demonstrate that they will be safe for their lifetime without increasing flood risk elsewhere.

ENVIRONMENTAL STATEMENT

- 9.88 The application is accompanied by an Environmental Statement (ES) prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The proposed development falls within Schedule 1, Part 9 of the EIA Regulations as it involves the continuation of waste disposal operations exceeding 100 tonnes per day. Accordingly, Environmental Impact Assessment (EIA) is a statutory requirement in this instance.
- 9.89 The ES, submitted in December 2024, provides an updated assessment of the likely significant effects of the proposal to extend the operational life of the landfill and composting facility at Rainham for a further five years (to 2029), with restoration completed by 2031. The ES supplements the original assessment produced for the extant planning consent and reflects updated baseline conditions, environmental guidance, and policy context. It draws upon site-specific surveys and professional judgement to determine whether the extension would give rise to new or materially different environmental effects compared to those previously assessed.
- 9.90 The ES is structured into technical chapters, supported by baseline data, figures and appendices. It addresses the following key topics:
- 9.91 **Landscape and Visual Effects:** The ES confirms that the extended duration of operational activity would result in a minor and temporary continuation of existing visual and landscape effects, particularly from elevated public rights of way and distant residential viewpoints. The completed restoration would result in long-term improvements to landscape character and visual amenity. No significant effects are predicted, consistent with GLVIA3 methodology.
- 9.92 **Ecology and Biodiversity:** No direct impacts are predicted to the adjacent Inner Thames Marshes SSSI or the RSPB reserve. Ecological survey data confirm that the continuation of landfill activity would not result in harm to protected species or habitats. The restoration scheme would deliver biodiversity enhancements, including the creation of diverse grassland and wetland habitats. A Biodiversity Net Gain (BNG) of over 10% habitat units and 15% hedgerow units has been calculated, in accordance with Defra's metric.
- 9.93 **Noise:** Noise monitoring and modelling confirm that the proposal would not result in exceedances of relevant noise thresholds at sensitive receptors. The continuation of operations for five additional years would result in no change in the type or pattern of noise emissions. Effects are assessed as not significant, with operational controls remaining in place.
- 9.94 **Air Quality and Bioaerosols:** Dispersion modelling predicts that emissions of nitrogen dioxide and particulate matter would remain below air quality objectives at all nearby receptors. Predicted annual mean NO₂ concentrations at the nearest receptors are below 30 µg/m³, well under the 40 µg/m³ objective. Bioaerosol risk from the composting facility remains low, with standard operational mitigation maintained. No significant effects are predicted.

- 9.95 **Transport and Access:** The proposal does not involve any increase in HGV movements, which remain at approximately 130 vehicle movements per day (including composting operations). Access continues to be taken from Coldharbour Lane. The ES concludes that the local road network has sufficient capacity to accommodate the continued operations without adverse safety or capacity impacts.
- 9.96 **Hydrology and Flood Risk:** The site is managed under an existing environmental permit and includes active leachate and surface water management systems. No changes are proposed to drainage or hydrological processes. The extension of time would not increase flood risk on or off site.
- 9.97 **Cultural Heritage and Archaeology:** The proposal involves no new excavation or ground disturbance. The ES concludes that there is no potential for impacts on buried heritage assets or the setting of designated heritage features.
- 9.98 **Cumulative Effects:** The ES considers the cumulative impact of the proposed extension in combination with nearby development, including the Freightmaster Estate. It concludes that there would be no significant cumulative effects, given the limited and temporary nature of the extension.
- 9.99 The ES identifies no likely significant environmental effects arising from the proposed development, either individually or cumulatively, subject to the continuation of existing controls and the implementation of the approved restoration scheme. Where impacts are identified, these are assessed as temporary, localised, and not significant under the EIA Regulations.
- 9.100 The submitted Environmental Statement meets the requirements of the EIA Regulations 2017 and provides a comprehensive and proportionate assessment of the proposed time extension. The conclusions of the ES are robust and confirm that the proposal would not result in any likely significant adverse environmental effects. The environmental effects of the scheme are well understood and can be appropriately managed through the continuation of existing operational controls and delivery of a biodiversity-led restoration scheme. The conclusions of the ES are accepted.

OTHER ISSUES

Health Considerations

- 10.1 Policies GG3, S2 of the London Plan seeks to improve health and address health inequalities having regard to the health impacts of development proposals while the Council's Local Plan policy 12 seeks to deliver healthy and liveable neighbourhoods that promote active and healthy lifestyles and enhance people's wider health and well-being.
- 10.2 The proposed development has been considered in the context of its potential effects on human health and wellbeing, in accordance with London Plan Policy GG3, which seeks to create a healthy city and reduce health inequalities, and Policy S2, which requires development to assess and mitigate health impacts. The continuation of operations at Rainham Landfill and composting facility for a

further five years would not introduce new sources of emissions or intensify activity on the site. The submitted Environmental Statement confirms that there would be no significant adverse impacts in relation to air quality, noise, water, or amenity that would affect public health. Existing environmental controls, including those secured under the site's Environmental Permit, would remain in place, thereby ensuring that local communities are not exposed to harmful levels of pollutants.

- 10.3 In the longer term, the approved restoration scheme would contribute positively to community wellbeing through the creation of accessible green infrastructure, new habitats, and enhanced landscape character. These improvements support the delivery of Havering Local Plan Policy 12, which promotes healthy and liveable neighbourhoods and encourages the enhancement of physical and mental wellbeing through improved environmental quality. Once restoration is completed, the site will form part of the wider Wildspace / London Riverside green corridor, with the potential to support informal recreation, biodiversity awareness, and engagement with nature—factors that have been widely recognised as beneficial to public health.

SECTION 106

Planning Obligations

- 11.1 The heads of terms of the Section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with policy DF1 of The London Plan 2021 and policy 16 of the Havering Local Plan 2021.
- 11.2 The proposed development represents an extension of time to an existing planning permission granted in 2012, which was subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990. That agreement secured a range of obligations related to the phased restoration of the landfill site, long-term aftercare, environmental monitoring, and public access provisions as part of the strategic Wildspace vision for the London Riverside area.
- 11.3 As the current application proposes to vary the duration of landfill and composting operations and extend the final restoration date from 2026 to 2031, the existing S106 agreement will require formal amendment to reflect the revised phasing and timetable. The key provisions of the original agreement—such as delivery of the approved restoration scheme, biodiversity enhancements, and long-term site management—will remain in effect but must be updated to align with the proposed operational and restoration programme.
- 11.4 It is therefore recommended that any grant of planning permission be subject to the prior completion of a Deed of Variation to the original Section 106 Agreement, to secure continued compliance with the obligations previously agreed and ensure that restoration, aftercare, and community benefits are delivered in accordance with the extended timescales.
- 11.5 The proposal is not Community Infrastructure Levy (CIL) liable.

EQUALITIES

- 12.1 The Equality Act 2010 provides that in exercising its functions (which includes its role as Local Planning Authority), the Council as a public authority shall amongst other duties have regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it
- 12.2 For the purposes of this obligation the term “protected characteristic” includes:- age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 12.3 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality.
- 12.4 Therefore in recommending the application for approval, officers have had regard to the requirements of the aforementioned section and Act and have concluded that a decision to grant planning permission for this proposed development would comply with the Council’s statutory duty under this important legislation.
- 12.5 In light of the above, the proposals are considered to be in accordance with national regional and local policy by establishing an inclusive design and providing an environment which is accessible to all.

CONCLUSIONS

- 13.1 The presumption in favour of sustainable development outlined in paragraph 11 of the National Planning Policy Framework (NPPF) is engaged.
- 13.2 The proposal is considered to comply with the strategic waste management objectives set out in the London Plan and the Havering Local Plan. London Plan Policy SI 8 promotes a circular economy and requires waste facilities to be safeguarded and efficiently utilised. The proposed extension of time allows the continued use of an existing, strategically significant waste site without the need for new land take, consistent with Policy SI 9 (Safeguarded Waste Sites). At the local level, Havering Local Plan Policy 19 supports the continued use and restoration of safeguarded waste sites where this does not result in unacceptable environmental or amenity harm. The temporary continuation of operations, combined with the proposed high-quality restoration, is considered to support the sustainable management of waste while also delivering long-term environmental benefits. The proposal also remains consistent with the Joint East London Waste Plan (JELWP), which identifies Rainham Landfill as a safeguarded strategic site for waste treatment and disposal.

- 13.3 The proposal is considered to align with London Plan Policies G1 and G6 by contributing to the strategic green infrastructure network and improving access to nature. Furthermore, the proposal supports Havering Local Plan Policies 27 through the integration of a high-quality landscape restoration scheme that reflects the local marshland character. The scheme is also consistent with Policy 18 in enhancing green infrastructure. While the operational extension prolongs visual impacts for a limited period, the residual effects are considered negligible following restoration and consistent with the Borough's long-term objectives for biodiversity, recreation and landscape enhancement in line with policy SSA17.
- 13.4 All material planning considerations, including the potential impact on neighbouring land uses, have been carefully assessed. It is acknowledged that the continued operation of the landfill could give rise to environmental effects; however, with appropriate controls secured through the Environmental Permit, planning conditions, and obligations within the Section 106 Agreement, it is considered that any impacts on neighbouring businesses and occupiers would be appropriately mitigated and managed. The proposal is therefore considered to accord with relevant local and strategic planning policies and guidance in this regard. It is therefore recommended that full planning permission should be approved.