



Havering
LONDON BOROUGH

**Strategic Planning
Committee – Developer
Presentation
7 December 2023**

Pre-Application Reference: W0073.23

Location: Rainham Lodge Farm, Berwick Pond Road.

Ward: UPMINSTER

Description: PHASED MINERAL EXTRACTION AND INFILL THE RESULTING VOID WITH INERT MATERIALS FROM LAND WITH RESTORATION TO A MIXTURE OF NATURE CONSERVATION AND AGRICULTURE AFTER USES AT RAINHAM LODGE FARM. ALL MINERALS WILL BE TRANSPORTED TO RAINHAM QUARRY PLANT SITE FOR PROCESSING, STOCKPILING AND SUBSEQUENT SALE.

Case Officer: Raphael Adenegan

1 BACKGROUND

- 1.1 This proposed development is being presented to enable Members of the committee to view it before a planning application is submitted and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 1.2 The proposed planning application has been the subject of pre-application meetings with Officers. There have been up to three pre-application meetings with officers and the scheme. Additional environmental studies and information have been provided and reviewed by specialists. Pre-application discussions with the applicants have included the principle of the development proposed including extent of development site, nature of extraction, filling and stockpiling, highways/transport matters, access, landscaping and biodiversity. The

proposals are being brought to Committee at this stage as an important part of the pre-application process.

2 PROPOSAL AND LOCATION DETAILS

2.1 Proposal

- 2.2 According to the details submitted to date, the proposal is to extract mineral (sand and gravel) from the site and infill the resulting void with inert materials. All minerals extracted will be transported to Rainham Quarry Plant Site, for processing, stockpiling and subsequent sale
- 2.3 The Rainham Quarry Plant Site, is located approximately 2 kilometres to the south, adjacent to Warwick Lane and Launder's Lane.
- 2.4 The proposed development will involve the extraction of approximately 2 million tonnes of high-quality aggregate, through the phased extraction of sand and gravel. The land will then be returned to near original ground levels by the importation of some 1.3 million cubic metres of inert clay and soils. The site is to be restored to a mixture of nature conservation and agricultural uses with enhanced public access. It is anticipated the whole development will take a maximum of 20 years to complete.
- 2.5 Access to the Rainham Lodge Farm site will be provided by means of a new purpose-built entrance onto Berwick Pond Road positioned to the south of the existing farm entrance. It is also proposed to re-open the northern access into Rainham Quarry Plant Site onto Warwick Lane. In addition to the formation of these access points, the applicant proposes improvements to Berwick Pond Road, Launder's Lane, and the junction at the northern end of Launder's Lane so as to accommodate the expected HGV movements.
- 2.6 In order to be able to continue to use the existing Rainham Quarry Plant Site for importation of mineral from Rainham Lodge Farm and be able to replace the existing mineral processing plant with a new plant, it will be necessary to submit another application for consideration by the LPA. The applicant has indicated that both applications will be submitted at the same time to allow consideration to be given to the entire development proposal.

Site and Surroundings

- 2.7 Rainham Lodge Farm is some 55 hectares in size. The Site consists of agricultural land, generally sloping from the north-east to the south-west and features several small blocks of deciduous woodland in the western part of the site with existing hedgerows on specific site boundaries
- 2.8 The site is located within the Green Belt and sits within the Thames Chase Community Forest boundary, with an existing nature reserve, the Hornchurch Country Park, Ingrebourne Marshes SSSI and Ingrebourne Valley Local Nature Reserve all to the west and southwest of the site. To the east there are several Listed Buildings within 1km of the site.

- 2.9 Public footpath no.216 currently passes through the centre of the Site in a broad north-south direction.
- 2.10 The majority of the site falls within Flood Zone 1 with a small part of the western boundary falling within Flood Zone 2.
- 2.11 The application site has a PTAL rating of 0(Worst).

Planning History

- 2.9 There are no relevant planning decisions to the application. However, this current application is relevant:

Z0001.23 – Request for an EIA Scoping opinion regarding mineral extraction / inert filling proposal with restoration to a mixture of nature conservation and agriculture afteruses (Rainham Lodge Farm, Berwick Pond Road) with stockpiling and processing of mineral, concrete batching and aggregate bagging (Rainham Quarry, Warwick Lane) and associated Highways Improvements.

Scoping Opinion issued. Environmental Statement to be submitted with a formal application

3 CONSULTATION

- 3.1 As with pre-application discussions no consultation with third parties has occurred. However, it is intended that the following will be consulted regarding any subsequent planning application:
- Natural England
 - Havering Friends of the Earth
 - Environmental Health
 - RSPB
 - Lead Local Flood Authority
 - Highways
 - Landscape – Place Services
 - Ecology – Place Services
 - The Environment Agency
 - DEFRA
 - Historic England (Archaeology)
 - The Mayor of London (referable application)

4 COMMUNITY ENGAGEMENT

- 4.1 In accordance with planning policy and guidance, the developer should consult the local community on these proposals as part of the pre-application process. Consultation has already taken place with the applicant hosting a website, holding a public event and inviting comments. The website can be viewed at <https://www.rainhamquarry.co.uk/>

5 MATERIAL PLANNING CONSIDERATIONS

5.1 The main planning issues raised by the application that the Committee must consider are:

- Principle of development
- Green Belt
- Landscape and Visual Impact
- Geology, Hydrology and Flood Risk
- Access, the impact on the highway network and Lorry Routeing
- Air Quality and Dust

5.2 Principle of Development

- The London Borough of Havering, as per Policy SI 10 of the London Plan is required to maintain a sand and gravel landbank of at least 1.75 million tonnes throughout the plan period (until to 2041) – this equates to a seven year landbank. The Council last formally produced a Local Aggregate Assessment (LAA) in October 2014. The conclusion of this was that the Council's landbank was approximately 2.5 years on the basis of a permitted reserve of 700,000 tonnes. Since October 2014, planning permission has however been granted for mineral extraction at East Hall Farm, Wennington Hall Farm and Madina Farm.
- The London Borough of Havering, even with the operations at East Hall Farm, Wennington Hall Farm and Madina Farm, does not have a sufficient landbank to comply with the apportionment figure detailed in the London Plan. Whilst the landbank position has improved with the granting of planning permission for East Hall Farm, Wennington Hall Farm and Madina Farm, these have a finite life. It is considered that planning policy dictates that the Council (as the mineral planning authority), in the circumstances, should generally supports proposals for mineral bearing development subject to no significant adverse environmental impacts.
- When preferred sites for mineral extraction to achieve a seven year sand and gravel landbank during the plan period are identified, applications for mineral development have to be assessed on their individual merits, as per Policy 38 of the Local Plan. In terms of the principle of development, it is therefore considered that in providing additional mineral reserve broad policy support exists for the development coming forward as the sand and gravel landbank in Havering is currently below seven years.

5.3 Green Belt

- The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristic of Green Belts are their openness and their permanence. .
- Paragraph 150 of the NPPF identifies certain forms of development which are not inappropriate in Green Belt provided they preserve the openness of

the Green Belt and do no conflict with the purposes of including land in Green Belt. These include mineral extraction.

- In context of the above, it is considered that mineral extraction is capable of being judged to be appropriate development in the Green Belt, subject to an assessment in regard to preserving openness. Accordingly, it is considered that the landscape impacts of the proposal be assessed, recognising that the presence of buildings, plant, and bunds will be temporary albeit for up to a 20 year period. Members may wish to comment on this part of the proposal particularly with regards to impact on openness and impact on Green Belt.

5.4 Landscape and Visual Impact

- Mineral extraction by its very nature can be visually intrusive. As existing this is an agricultural field, and largely blends into the adjacent landscape setting.
- Of note in respect of this development, the proposals should harness the topographical and ecological character of the site and complement or improve the amenity and character of the area through its appearance, materials used, layout and integration with surrounding land and buildings.
- The proposal will introduce soil bunds of few metres high, which would be visible from nearby areas and accordingly appear as an incongruous landform in the landscape. Given the proposed timeframe for the development it is also considered that it is likely that the bunds would be able to be grassed.
- Mindful of the site topography, it is considered that machinery would be visible from nearby areas, above the screening bunds, and in the case of vehicles when these are travelling down the access road.
- The applicant has been working with the Council Landscaping Consultant in developing a Landscape Strategy including a management and maintenance plan for the landscape elements, which would include mitigation measures on:
 - Long term design objectives
 - Management responsibilities
 - Details of operations and procedures
 - Task table/ annual matrix
 - Plans indicating any rotational cutting or management e.g. hedgerows and meadows
 - Decommissioning of the site structures and restoration of the land back to agricultural use.
 - Potential impact on views from the nearby Hornchurch Country Park
- Members may want to know how the visual impact of the proposals on the landscape will be minimised and the restoration plan proposed.

5.5 Geology, Hydrology and Flood Risk

- Given the site locality and that much of the surrounding area has previously been worked and infilled, the impact upon groundwater flow would need to be

fully considered. The applicants have outlined that surface water run-off, post restoration would be controlled by a perimeter drain which would collect surface run-off from the field and route it to a soakaway (pond).

- Turning to flood risk and drainage, the majority of the site is located within Flood Zone 1 at low probability to flooding. The site is proposed to be worked wet and accordingly there would be no excess discharge from dewatering during the course of operations. The site is proposed to be restored to existing levels and agricultural use. A Flood Risk Assessment should include measure to mitigate flooding or improve discharged water quality to be taken into account as part of the landscape strategy.

5.6 Access, the impact on the highway network and parking provision

- It is proposed to reinstate an historic site access to the Rainham Quarry (RQ) site from Warwick Lane. The proposed operational route for extraction activity is identified as being between the Rainham Lodge Farm (RLF) site and the RQ site along Berwick Pond Road in both directions, consideration has been given to the predicted journey time along this route.
- As detailed the application principally involves two stages – the extraction and the restoration (infilling). The estimated vehicle movements associated with the extraction would be approximately 114 two-way HGV movements per day (57 in each direction), which equates to a total of approximately 11 two-way HGV movements per hour (assume 6 in each direction) over an 11- hour operational day.
 - Hours of operation (all activities) will be:
Mondays to Fridays - 07:00 to 18:00
Saturdays - 07:00 to 13:00
No operations will take place on Sundays or Public Holidays.
- The submitted Technical Note raises the following issues which require a detailed response from the Highways Authority. The technical note sets out the following:
 - The note suggests that HGV's travelling to/from the minerals site will not meet on Berwick Pond Road. However, there is no detail on how that will be ensured and whilst it may be possible to control vehicles "shuttling" between the site and the processing site, control of vehicles carrying restoration material will be difficult.
 - The note proposes widening works to various points along Berwick Pond Road to allow two HGV's to pass, but there would remain a section of Berwick Pond Road where widening is not possible and HGV's passing may result in cutting up of the verge/mud on road.
 - The left-turn out of the access from Rainham Quarry is tracked to show the HGV would cross the central white line onto the opposite side of the road. There is a similar issue with the left turn into of the mineral site crossing onto the other side of the road. Changes to the design of these junctions and/or restrictions on turning directions may be necessary
 - The note proposes a priority arrangement on Launderers Lane where it narrows over the watercourse.

- The note mentions the lack of visibility on the Launderers Lane/Upminster Road North/Berwick Pond Road/Warwick Road junction and suggests that this is due to a fence on highway land. This would need to be addressed.
- There is no mention in the note about the strength/condition of the roads to cope with additional heavy vehicles, including whether any of the current structures over water courses are strong enough and such studies may be required as part of any application submission..
- It is expected that the issues listed above would have been satisfactorily addressed prior to submission of the formal planning application.

5.7 Amenity Impacts

- The nearest residential properties to the site are those to the north on Hacton Lane and to the northeast on Park Farm Road at the junction with Berwick Pond Road, circa 100m and 180m respectively from the area of extraction as the crow flies. The access point to the site from Berwick Pond Road is only 73m from entrance to Rainham Lodge Farm. Given the distance from nearby residential properties to the actual extraction area it is considered that the development could have the potential to give rise to noise impacts but it is considered that the phasing of the works would help mitigate the impact..

5.8 Air Quality and Dust

- Policies 33 and 34 of the Local Plan detail that planning permission will only be granted where new development, both singularly and cumulatively, does not cause significant harm to air quality and does not cause a breach of the targets set in Havering's Air Quality Management Area Action Plan.
- The applicant is expected to carry out an air quality and a noise impact assessments as part of this application process.

5.9 Restoration & Public Rights of Way

- Site restoration would be back to existing levels, achieved through the importation of inert materials. No processing of material is proposed as part of the restoration, with the applicant suggesting all material to be imported would be strictly inert, sourced from the excavation sector of the construction market. With regard to this, once the imported material has brought the surface up to the base of the soil, the indigenous soils stored in the screening bunds would be re-spread. Following this, it is proposed that the site would be returned to an agricultural use.
- The Technical Guidance to the NPPF details that applicant's as part of reclamation schemes should demonstrate that the site can be reclaimed to an acceptable standard and after use. It is suggested that appropriate conditions should be imposed by the local planning authority to ensure that the restoration and after use is achieved.
- The proposal would involve the diversion of the existing footpath during the works from the south to the north of the site and to be restored after the restoration works have been completed.

Financial and Other Mitigation

5.10 Any subsequent planning application will be supported by a package of measures secured under s106 of the Town and Country Planning Act 1990 or the Community Infrastructure Levy (as appropriate), to mitigate impacts of the proposed development.

5.11 Other Planning Issues:

- Heritage and Archaeology
- Ecology
- Open Space and Recreation provision post-restoration
- Noise
- Vibration

Conclusion

5.12 The proposed development has been considered at pre-application meetings with officers, and the scheme is being developed as a result. There are some aspects that require further work as identified in this report and Members' guidance will be most helpful to incorporate as the various elements are brought together.

5.13 Further, it is possible that this scheme could come back to this Committee for final review as part of the continuing Pre-Application engagement but only if members seek further clarification.