



Havering
LONDON BOROUGH

**Strategic Planning
Committee
25 January 2024**

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| Application Reference: | P0070.23 |
| Location: | Veolia ES (UK) Ltd Coldharbour Lane |
| Ward | RAINHAM AND WENNINGTON |
| Description: | Continued operation, redevelopment and expansion of the existing Plastics Recycling/Recovery Facility, Materials Recycling Facility buildings to provided 11,000 sqm floorspace with vehicle depot with associated landscaping and parking (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 reconfigure and expand the existing materials recovery facility (MRF) and plastics recycling facility (PRF) into a single, larger, consolidated building would represent a more sustainable use of the site and would support the economic, social and environmental sustainability objectives of the Havering Local Plan.

- 1.2 This existing operation was first granted planning permission in 2012 as part of the larger waste activities on the wider site and 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. Furthermore, since the adoption of the Local Plan in 2021, the site of the MRF/PRF has been included as within a Strategic Industrial Location. There have been no material adverse impacts on neighbouring amenity or material environmental concerns since the operation began. 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 would represent a notable improvement in the visual amenity of the site and the building design would also represent a more sustainable and efficient development.
- 1.4 Officers consider that the proposal would protect local ecology and biodiversity and would cause no 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 and conditions.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission subject to:
 - Any direction by the London Mayor pursuant to the Mayor of London Order
 - Prior to completion of a legal agreement to secure the following planning obligations:

Conservation Park / Wildlife Contribution

- £28,350 contribution for park facilities

Travel Plan

- Travel plan with £5,000 monitoring fee

Carbon Offset Fund

- To pay the relevant carbon offset contribution to the local authority carbon offset fund pursuant to the approved updated Energy Assessment.

- Carbon Offset fee (TBC). Sum will be calculated at ninety-five pounds or £95 x 30 years = £2,850 per tonne of carbon to be offset

Legal Costs, Administration and Monitoring

A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

- 2.2 That the Director of Planning is delegated authority to negotiate the legal agreement indicated above and that if not completed by the 26th April 2024 the Director of Planning is delegated authority to refuse planning permission or extend the timeframe to complete the legal agreement and grant approval.
- 2.3 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. Statutory Time Limit
2. Accordance with Approved Plans
3. Phasing
4. Restriction on Use
5. Hard & Soft Landscaping Plan
6. Landscape Management Plan (LMP)
7. Archaeology
8. Land Affected by Contamination
9. Verification Report
10. Long Term Monitoring and Maintenance Plan for Groundwater
11. Unidentified Contamination
12. Borehole Management
13. Piling / Foundation Works Risk Assessment of Groundwater Resources
14. Infiltration of Surface Water onto the Ground
15. Sustainable Urban Drainage
16. Ecology
17. Construction Environment Management Plan (Biodiversity)
18. Ecological Design Strategy for On-site Habitat Creation for Invertebrates
19. Wildlife Sensitive Lighting Design Scheme
20. Carbon Reduction
21. Life Cycle Carbon Statement
22. Circular Economy
23. BREEAM
24. Floor Levels
25. Construction Method Statement
26. Demolition & Construction Logistics Plan
27. Delivery & Servicing Plan
28. Construction Waste Management Plan

- 29. Parking Management Plan
- 30. Travel Plan
- 31. HGV Wheel and Vehicle Cleaning
- 32. Non-Road Mobile Machinery (NRMM)
- 33. EV Charging Points
- 34. Dust Management Plan
- 35. Air Quality Neutral Condition
- 36. Mitigation of Excess Emissions Condition
- 37. Urban Greening Factor

3 SITE DESCRIPTION

- 3.1 The application site is an irregular 'D' shape with a depth of approximately 250 metres and a width of approximately 250 metres giving an overall site area of 24,000 m² (2.4 hectares). The low-lying part of the site to which the current planning application relates to is the recycling facility only and comprises two large industrial buildings including (1). Materials Recovery Facility (MRF) and (2). Plastics Recycling facility (PRF). The MRF and PRF facilities represent a small, southern section of the larger Veolia site which includes the landfill operations granted under P1566.12.
- 3.2 The site 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. 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 west of the site is the Freightmaster Estate.
- 3.3 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.
- 3.4 Due to the expansive marsh area surrounding the north of the site, the nearest residential properties to the application site are located approximately 1.3km to the south across the River Thames in Erith. The public transport accessibility of the site is PTAL 0 (Worst).
- 3.5 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).
- 3.6 The site also falls within the 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)

4 BACKGROUND (Existing Site Operations)

- 4.1 The applicant submits that the MRF operations consist of managing all the material income handling activities.
- 4.2 The incoming mixed plastic recyclables usually range between plastic containers, cans and glass bottles. The MRF process operation generally consists of a combination of sorting and conveying equipment that typically includes a trommel screen, optical sorters, magnet, eddy current separators, a bale maker, mechanical bunkers and a quality control cabin. Depending on the type of material output from the sorting process (the 'material recovery' element of the process) the recycled materials are baled and then stored for a short period of time before being transported off site.
- 4.3 The PRF is similar to the MRF but includes technology that has the ability to separate out nine different grades of plastics ranging from bottles, yoghurt tubs and trays, which by dividing them ensures a high quality and high value recovered recyclables stream for the end users. This is particularly useful given it can adapt to any mixed recyclable collections from municipal and commercial customers.
- 4.4 The baled plastics are then transported off-site. All recyclable materials recovered from the MRF and PRF process will be sent off to either Veolia's other plastics recycling facilities or to third party recycling companies depending on the type of material stream and the market demand. The materials recovered by the PRF and MRF are typically used as a resource to produce new products or containers helping to increase the amount of recycled materials used in new products.
- 4.5 The PRF & MRF site operates on a 3-shift basis over a 24-hour period each day. Veolia employs approximately 165 staff members to operate the facility onsite throughout the day. Veolia staff members work across various operational, technical and management roles on site.
- 4.6 The applicant submits that the PRF and MRF currently provides in excess of 50% of the materials that feed into Veolia's other recycling facility operated in the neighbouring Borough of Barking and Dagenham. Veolia's Dagenham facility is a 'bottle to bottle recycling process facility that accepts bales of plastic milk bottles (High-density polyethylene often referred to as 'HDPE' type plastic) that are sorted, shredded and then turned into recycled plastic pellets. These recycled plastic pellets, which are tested to meet food grade standards, Veolia's Dagenham facility relies heavily on Veolia's Rainham's facility to remain operational in order to supply manufactures with recycled plastic pellets.
- 4.7 Finally, the applicant submits that Veolia's Dagenham site also employs 50 staff members to operate the facility 24 hours a day and five days per week. Therefore, if Veolia's PRF and MRF site is unable to remain operational at Coldharbour Lane in Rainham beyond December 2024 then it's possible that the Dagenham facility may not be able to remain as viable to support the re-production of plastic bottles.

5 DESCRIPTION OF PROPOSAL

5.1 The submitted Planning Statement describes the proposal as follows:

1. Temporary extension of time – A temporary continuation of the current PRF and MRF operations onsite, as existing, until the end of 2026.
2. Site re-arrangement - The existing bale storage located in the southern area of the application site will be utilised to accommodate the new and additional building floor space that will become the new MRF. The existing bale storage will be relocated to the northernmost area of the site, which will be screened from view under a new roof but will remain structurally open fronted for easy vehicle access.
3. Phased Redevelopment of buildings after 2026 - Commencement of a phased redevelopment of the proposed PRF and MRF layout, including the development of approximately just under 3,500sq.m floor space added as the two existing PRF and MRF buildings will be re-configured to operate under one roof.
4. This will result in the potential demolition of the northern building onsite with the intention to retain as much of the existing steel frame where possible. The existing buildings will be joined up, connected and expanded by retaining as much of the structural steel framework of the existing building as possible. The buildings will be extended in width and height. Following the redevelopment, an overall building floor space of approximately just over 11,000sq.m will house the MRF, PRF and bale storage.
5. Building design - The existing external cladding will be fully replaced by a new cladding design and colour that will provide the facility with an attractive new aesthetic that will be sympathetic to the local surroundings as shown in the Design Access Statement (DAS) and planning drawings.
6. Operations: Tonnage - New input tonnage of approximately 200,000 tonnes per annum (200 ktpa) of commercial and municipal materials accepted onsite. Currently the site accepts approximately 130ktpa - 160ktpa of input materials.
7. Office/welfare - The proposed redevelopment of the PRF and MRF buildings will include a new double storey office and welfare building for staff and visitors, which will be positioned along the southern elevation of the new building extension. Resulting in approximately 730sq.m of floor space, the new double storey offices will also help to break up the industrial appearance of the proposed redevelopment along the southern facade of the building and be more aesthetically pleasing for views from the south including from the river and Coldharbour Lane.
8. Boundary treatment - New hard landscaping boundary treatments at key visual points around the application site's perimeter mesh paladin fencing, where the southern and western sections will include a wall up to 1.2 metres high.

9. Vehicle/site access -Reinstate the existing vehicle opening of Coldharbour Lane along the western boundary of the application site for car vehicles to enter/leave. This will ensure the separation between the office staff and visitors from the site's operational areas where Heavy Goods Vehicles (HGVs) and mobile plant will be in operation.
10. Staff and visitor vehicle parking - Approximately no. 94 car parking spaces. This includes parking for members of staff, visitors, accessible/disabled parking, and parking spaces with Electric Vehicle charging points. No. 24 cycle parking provision and approx. no. 10 motorcycle parking spaces.
11. New vehicle depot -Approximately no. 20 parking spaces are proposed for the overnight parking of HGVs/Trailers. These vehicles will leave the site early in the morning to join their waste collection rounds before they return later in the day to park-up onsite, repeating the same operation the following day. Although these vehicles may not be predominantly associated with the PRF and MRF operations Veolia has the opportunity to utilise the space and resources onsite to accommodate this activity in order to continue providing a service to customers.
12. Internal vehicle movements - The internal HGV vehicle pathways will be retained along the eastern boundary of the application site. Two new pit mounted weighbridges will be installed to the north of the application site for incoming and outgoing HGVs to be weighed.

6 RELEVANT HISTORY

- 6.1 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

- 7.1 Public consultation took place in accordance with statutory requirements. This included a total of 15 letters sent to occupiers of neighbouring properties (all commercial), a press advert published in Romford Recorder and site notices displayed outside the application site.
- 7.2 No representations were received from members of the public or from neighbouring landowners/ occupiers.

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

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

LBH Community Safety – No objection

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

LBH Place Services (Trees) – No objection

LBH Inclusive Growth – suggest that the permission should be temporary pending a new Rainham Masterplan.

External Consultees

Historic England (GLAAS) - No objections subject to conditions

Environment Agency - No objections subject to conditions

London Fire (LFEPA) - No objections subject to conditions

Thames Water - No objections subject to informatives

Transport For London (TFL) - No objections subject to conditions

Greater London Authority – No objection subject to conditions

8 RELEVANT POLICIES

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

National Planning Policy Framework 2023

8.2 The National Planning Policy Framework (NPPF) sets out Government planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Themes relevant to this proposal are:

1. Introduction (Paragraphs 1 to 6)
2. Achieving sustainable development (Paragraphs 7 to 14)

3. Plan-making (Paragraphs 15 to 37)
4. Decision-making (Paragraphs 38 to 59)
5. Building a strong, competitive economy (Paragraphs 85 to 89)
6. Promoting healthy and safe communities (Paragraphs 96 to 107)
7. Promoting sustainable transport (Paragraphs 108 to 117)
8. Making effective use of land (Paragraphs 123 to 130)
9. Achieving well-designed and beautiful places (Paragraphs 131 to 141)
10. Meeting the challenge of climate change, flooding and coastal change (Paragraphs 157 to 179)
11. Conserving and enhancing the natural environment (Paragraphs 180 to 194)
12. Conserving and enhancing the historic environment (Paragraphs 195 to 214)

London Plan 2021

GG1 - Building strong and inclusive communities

GG2 - Making the best use of land

GG5 – Growing a good economy

D1 - London's form, character and capacity for growth

D2 - Infrastructure requirements for sustainable densities

D3 - Optimising site capacity through the design-led approach

D4 - Delivering good design

D5 - Inclusive design

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 4 - Managing Heat risk

SI 12 - Flood risk management

SI 13 - Sustainable drainage

G5 - Urban greening

G6 - Biodiversity and access to nature

T1 - Strategic approach to transport

T2 - Healthy streets

T3 Transport capacity, connectivity and safeguarding

T4 - Assessing and mitigating transport impacts

T5 - Cycling

T6 - Car parking

T7 - Deliveries, servicing and construction

T9 - Funding transport infrastructure through planning

DF1 - Delivery of the Plan and Planning Obligations

Local Plan 2021

- Policy 19 – Business Growth
- Policy 22 – Skills and Training
- Policy 23 – Transport Connections
- Policy 24 – Parking Provision and Design
- Policy 26 - Urban Design
- Policy 28 – Heritage Assets
- Policy 30 – Biodiversity and Geodiversity
- Policy 33 – Air Quality
- Policy 34 – Managing Pollution
- Policy 35 – Waste Management
- Policy 36 – Low Carbon Design and Renewable Energy

8.4 Other Material Planning Documents

Joint Waste Development Plan for the East London Waste Authority Boroughs 2012

- 8.5 In 2012 the Council adopted the Joint Waste Development Plan, which was developed in collaboration with Barking and Dagenham, Newham, and Redbridge.
- 8.6 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.
- 8.7 The Joint Waste Plan forms part of the planning policy suite of documents for each borough.
- 8.8 A new Joint Waste Plan is needed. The East London Waste Plan Evidence Base (2022) has been produced as the first step towards creating a new Joint Waste Plan.

Policy SSA17 - London Riverside Conservation Park

- 8.9 Policy SSA17 is a relevant policy and allocation in relation to the application site. The allocation relates to Map reference TQ 525800 in the Site Specific Allocations Development Plan which shows the allocation of the London Riverside Conservation Park as covering the whole of Veolia's wider site on Coldharbour Lane, the Freightmaster Estate and the commercial and industrial uses to the north of the landfill site. This allocation has since been scaled back as shown in the Havering Local Plan 2021 and Proposal Map (South) 2021.

Character and Context SPG (2014)

- 8.10 This document sets out the principles of site responsive design that should inform the Design and Access Statement to be submitted with the application, helping to promote the right development in the right place.

PLANNING CONSIDERATIONS

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

- 1) Principle of Development
- 2) Design & 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) Other Issues (Health)
- 11) S106

PRINCIPLE OF DEVELOPMENT

- 9.2 The NPPF 2023 places a presumption in favour of sustainable development and states that achieving sustainable development means that the planning system has three overarching objectives, the social economic and environmental objectives.
- 9.3 Whilst the principle of the recycling facility and industrial use has been established and deemed acceptable by the extant and live permission ref. P1566.12, this was for a temporary period associated with the lifetime of the wider landfill site (to December 2024). Therefore, a fresh look at the proposal and reconsideration of the scheme against the current development plan policies and NPPF is considered appropriate.
- 9.4 Sustainable Development (Paragraphs 7-14): The NPPF 2023 emphasizes the importance of sustainable development as a central objective of the planning system. The proposed plastics recycling facility aligns with these objectives by promoting efficient resource use and reducing waste, contributing to the economic, social, and environmental goals outlined in the NPPF's sustainable development priorities.
- 9.5 Building a Strong, Competitive Economy (Paragraphs 85-89): The NPPF 2023 underscores the significance of fostering a robust, responsive, and competitive economy. It highlights the necessity of making available sufficient land of appropriate types in the right places to support economic growth and innovation. The proposed recycling facility is compatible within these

parameters as an important part of the industrial sector, contributing to economic growth and job creation.

- 9.6 Promoting Healthy and Safe Communities (Paragraphs 96-107): The NPPF 2023 focuses on fostering strong, vibrant, and healthy communities. By reducing plastic waste, the plastics recycling facility would contribute to environmental health, thus supporting the Framework's objectives of fostering well-designed, beautiful, and safe places with accessible services and open spaces that support communities' health, social, and cultural well-being.
- 9.7 Effective Use of Land (Paragraphs 123-130): The NPPF 2023 encourages the effective use of land to meet various needs, including housing and industrial use. The proposed recycling facility contributes to these broader goals by making good use of land for sustainable industrial purposes, thus aligning with the Framework's directives for land use.
- 9.8 Achieving Well-Designed and Beautiful Places (Paragraphs 131-141): The revised 2023 Framework stresses the importance of well-designed, beautiful places that are sustainable and positively contribute to the local character and quality of the area. The proposed building design and form plastics recycling facility would represent an improvement to the visual amenity of the site and would be designed with the principle of transitioning to a low-carbon future and contribute to the NPPF's goals of enhancing the natural environment and mitigating climate change.
- 9.9 Waste (Paragraphs related to waste management): the NPPF 2023 addresses waste management within its broader environmental objectives. These include protecting and enhancing the natural environment by minimizing waste and pollution. The proposed recycling facility would support these objectives by promoting the reuse of materials and sustainable waste management practice
- 9.10 London Plan Policy 2021 E4 'Land for Industry, Logistics, and Services to Support London's Economic Function' states that
1. "Boroughs should ensure that there is sufficient land and floorspace to meet the needs of London's economy by safeguarding existing industrial land and premises."
 2. "Where there is a demonstrable need, boroughs should promote the intensification and co-location of industrial and other land uses."
 3. "Proposals for industrial intensification, co-location and substitution should ensure that they do not have an adverse impact on the surrounding area."
 4. "Boroughs should seek to manage existing industrial land in a way that enhances its quality and adaptability for industrial uses, particularly for small and medium-sized enterprises."
- 9.11 The proposal to redevelop the existing MRF and PRF on site and consolidate into one larger facility would represent a continuation and more efficient operations on site ensuring the efficient use of industrial land, in line with London Plan 2021 policy E4. The ongoing use would also be supported by London Plan policy GG5 "Growing a good economy" which states that

development must plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.

- 9.12 The expansion would also be supported by Havering Local Plan policy 19 'Business Growth' which states that the Council is committed to building a strong and prosperous economy in Havering and will encourage and promote business growth by supporting the London Riverside Business Improvement District. It has been suggested, that any permission should be on a temporary basis, until such time as, the new Rainham masterplan is produced. However, the proposals will provide a significant increase in employment in this existing business, which is within the Strategic Industrial Location where the growth and development of existing employment uses is supported. At present, there is no Rainham masterplan and therefore it would not be appropriate to grant a temporary permission.
- 9.13 In summary, the proposals are considered to be in line with the policies of the NPPF, 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.

DESIGN

- 9.14 Chapter 12 of the NPPF 'Achieving well-designed and beautiful places' states at paragraph 131 that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 9.15 London Plan 2021 policy D1 'London's form, character and capacity for growth' part A 'Defining an area's character to understand its capacity for growth' states that boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. The site is located within a defined Strategic Industrial Location (SIL) and as such the existing operation and indeed the proposed expansion are considered acceptable as it would optimise the facility and follow a design-led approach as per policy D3.
- 9.16 London Plan policy D4 'Delivering good design' states at part F 'maintaining design quality' that the design quality of development should be retained through to completion by: 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development. The submitted detail is considered acceptable and the proposed building design and form is considered acceptable given its industrial character and would be of a footprint and height/scale that can be accommodated comfortably by the site. The surrounding topography is such that the building would utilise an area of lower land next to the River Thames

and would not be highly visible from any public view points north of Coldharbour Lane. The site is obscured by the landfill site to the north and east which stands some 25-32 metres higher than the application site.

- 9.17 The submitted drawings indicate that the proposed building would have a sloping roof profile to add visual interest to the built form and would be some 150 metres long by 115 metres deep and with a height ranging from 8.2 metres to 17.6 metres in height. In the submitted Design & Access statement, the applicant states that the (building) forms created are intended to focus on the horizontal emphasis of the site and to respond to the surrounding elevated topography set up by the adjacent landfill site, which will eventually become a Country Park.
- 9.18 The statement submits that enhancement of the abstract building profile then comes from the application of cladding tones that break the rules of vertical and horizontal lines more often associated with metal cladding facades. The building roof form is a simple mono pitch plane that takes on the form of the surrounding topography rather than that of a conventional portal frame roof form.
- 9.19 The proposed scale, form and detailed design is considered acceptable subject to planning conditions relating to external materials.

Landscaping

- 9.20 The applicant submits that operational usage on the site is maximised particularly with the relocation of the previously remote staff parking within the site boundary. There are however some areas around the site perimeter that can be developed with a mix of hard and soft landscaping that assist in softening the visual impact of the site from the Country Park.
- 9.21 The applicant submits that given the exposed estuary environment, it is not considered appropriate for tree planting within the site but the use of carefully selected low to medium height shrubbery to strike a balance between the exposed environment and the operational facility.
- 9.22 Additionally, some areas can be developed with grass / lawn as staff amenity areas, particularly adjacent to the offices located on the southern elevation. The proposals are considered acceptable by the Landscaping Team and Ecology Team subject to a number of planning conditions.

IMPACT ON AMENITY

- 9.23 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.
- 9.24 As stated above, the application site is located some 1.3km away from the nearest residential receptors which are on the south side of the River Thames and some 2km away from the nearest Havering residential receptors to the

north of the site. The proposal is not considered to cause any harm to neighbouring residential amenity by way of loss of outlook, daylight and sunlight, or by way of overlooking and loss of privacy.

ENVIRONMENTAL IMPACTS (NOISE, DUST, AIR QUALITY)

Noise

- 9.25 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. The applicant submits that the application site is an existing operational site and there have been no reported adverse affects or impacts since the operations began post 2012. Only the configuration and scale of the PRF and MRF buildings will change under the current proposal and with a marginal increase in floor area and intensity of use. The operational plant and machinery would be the same as existing and no material change in use or processes would occur.
- 9.26 The Noise Impact Assessment report, reference no. R22.0901/DRK concludes in paragraph 6.3.1 part 1 that the proposed new building provides an improvement in noise levels due to the design and improved acoustic performance of the cladding. Paragraph 6.3.2 further concludes that the proposed operation of the site would generate noise levels well within relevant noise standards and guidelines at nearest sensitive receptors and therefore noise would not be significant.

Air Quality

- 9.27 London Borough of Havering was declared an Air Quality Management Area in 2006. The planning application proposal has been subject to an Air Quality Assessment (AQA), report no. R3101-R01-v2. The AQA report considers the impacts from the construction process, vehicle exhaust emissions and any odour and dust from the existing operations and concludes in paragraph 5.12 that no significant impacts that would preclude planning permission for the proposed development have been identified. No further assessment or consideration of air quality issues is deemed necessary.
- 9.28 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

- 9.29 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. The car parking standards in the London Plan policy T6 are maximum standards in accordance with PPG13.

- 9.30 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.
- 9.31 The proposed on-site parking provision for staff is considered acceptable subject to a planning condition securing a Parking Design and Management Plan.
- 9.32 The applicant submits that the site will continue to accept HGV movements for the tipping and taking away of recyclable materials as it currently does. The current material input ranges between 130,000 - 160,000 tonnes per annum and the current planning application is proposing an increased input of up to 200,000 tonnes of recyclable materials per annum (200 ktpa). The Transport Assessment (TA), report no. 3264-01-TA01, has determined that the increase in tonnage proposed to accommodate gradual growth will only result in an increase of an average of approximately 12 daily two-way HGV movements that will occur gradually.
- 9.33 The planning application also proposes to accommodate a vehicle depot of approximately 20 HGVs/trailers to enable Veolia to park empty waste collection vehicles related to existing waste collection contracts. This element of the proposal is to allow Veolia to utilise available space and resources onsite and to have a vehicle base in this area of London. As a result there will be an additional 40 two-way HGV movements onsite.
- 9.34 The application site's existing access and egress located along the northern boundary will become the site's only access/egress for HGVs to and from Coldharbour Lane. The opening will be designed to be wide enough to accommodate the passing of incoming and outgoing HGVs.
- 9.35 TFL have been consulted on the proposals and have advised that no Healthy Streets Active Healthy Zone has been considered. The applicant submits that this is less plausible given the highly isolated and industrial nature of the site which is understood. TFL have raised no objection to the scheme, subject to a number of planning conditions relating to Parking Design Management Plan (PDMP), cycle parking details, A Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) and Travel Plan.
- 9.36 In light of the above, the proposal is considered acceptable in highways terms subject to the planning conditions.

SUSTAINABILITY / ENERGY

- 9.37 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.

- 9.38 In recognising the importance of climate change and the need to meet energy and sustainability targets, as well as the Council's statutory duty to contribute towards the sustainability objectives set out within the Greater London Authority Act (2007), Policy SI 2 of the London Plan, the Mayor of London's SPG on Housing (2016). This has targeted the eventual aim of zero carbon for all residential buildings from 2016 and zero carbon non-domestic buildings from 2019. The policy requires all major development proposals to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction outlined above are to be met within the framework of the energy hierarchy.
- 9.39 The proposed floorspace would be as follows:
- Waste material processing – 11,050 sqm
 - Weighbridge and associated security office - 175 sqm
 - Associated offices - 730 sqm
 - External semi enclosed recycled waste bale storage - 4,124 sqm
- 9.40 The applicant submits that the scheme commits to achieving the carbon dioxide (CO₂) reduction targets required for each stage of the energy hierarchy and will exceed the London Plan's net zero carbon targets for major developments.
- 9.41 The scheme is expected to achieve a 24% emission rate reduction through energy demand measures (Be Lean) alone. Furthermore, the scheme is expected to achieve a 13% emission rate reduction as a result of onsite renewable energy generation (Be Green).
- 9.42 As a result, the overall cumulative on-site CO₂ saving for the scheme is expected to be 38%, as detailed in the appended GLA spreadsheet2.
- 9.43 The scheme will meet these targets through an enhanced fabric specification and efficient mechanical servicing:
- Heating (Main) - VRF Air source heat pumps (ASHP) – Serve the offices
 - Heating (Ancillary) - Electric panel heaters – serve the toilets, corridors, ancillary areas.
 - Water Heating - From ASHP
 - Ventilation – Mechanical extract
 - Lighting - 100% Low energy LED
 - Renewable Energy Technologies - Photovoltaic Array – 20KWp
- 9.44 The Council's external Sustainability & Energy consultant has advised that the proposal is acceptable subject to further conditions and information regarding life cycle carbon and revised calculations in line with the GLA spreadsheet.

ARCHAEOLOGY

- 9.45 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.

- 9.46 Historic England has been consulted and has raised no objection to the development subject to a condition requiring a Written Scheme of Investigation (WSI).

ECOLOGY AND BIODIVERSITY

- 9.47 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.
- 9.48 Whilst an ES was not required, the application is accompanied by a Preliminary Ecology Appraisal (FPCR, September 2022). The Council's Ecology Consultants have advised that the mitigation measures identified in the Preliminary Ecology Appraisal (FPCR, September 2022) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats and nesting birds.
- 9.49 The Ecology Consultants also advised that a Construction Environmental Management Plan (CEMP: Biodiversity) should be provided, particularly as the site is in close proximity (50 metres) to the River Thames and associated SINC. This should also demonstrate that construction lighting is directed away from the River Thames.
- 9.50 The proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2023) are also supported. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured by a condition of any consent. We recommend that this could also include creation of on-site habitat to encourage Thames Terrace invertebrates and / or invertebrates using nearby designated sites e.g., the Inner Thames Marshes SSSI.
- 9.51 In summary, it is considered that these proposals should not prevent, or cause adverse effects upon, any long-term biodiversity restoration proposals for the wider site.
- 9.52 An Urban Greening Factor calculation has been received for the site and this states that the scheme achieves a score of 0.3, this meets the target score as recommended by Policy G5 of the London Plan for commercial developments.

FLOOD RISK

- 9.53 Guidance under the NPPF seeks to safely manage residual risk including by emergency planning and give priority to the use of sustainable drainage systems.
- 9.54 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.
- 9.55 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.
- 9.56 The Council will seek to reduce the risk from surface water flooding by requiring development proposals to:
- iv. Reduce surface water runoff by providing sustainable drainage systems (SuDS), unless there are practical reasons for not doing so; and
 - v. Ensure that proposals for SuDS apply the London Plan drainage hierarchy achieving greenfield run-off rates, where feasible, and include clear arrangements for ongoing maintenance over the lifetime of the development.
- 9.57 The application site falls within Flood Zone 3a (high risk of flooding area) of the Environment Agency Flood Map given its Thames side location. There has been considerable delay with regard to the EA's response given their request for clarification of some key information regarding flood risk.
- 9.58 The EA recently clarified by way of consultation response dated 13th November 2023 that:
- 1. The development is situated above the modelled 0.1% AEP (1-in-1000-year) tidal flood event (TE2100 Extreme Water Level).
 - 2. The proposal will not prevent the installation of flood defence south of the road at a future date when required.

9.59 The Environment Agency have advised that they have no objection to the scheme subject to seven conditions:

1. Land contamination
2. Verification
3. Ground water maintenance and monitoring
4. Unidentified contamination
5. Borehole management
6. Piling / Foundation works
7. Infiltration of surface water

OTHER ISSUES

Health Considerations

9.60 Policies GG 3, 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.

9.62 Given the nature of the MRF and PRF facility as a type of 'sorting' step in the recycling process it is not considered that the use would raise any unique health implications. It not considered that the proposals would prejudice the opportunity of residents, neighbours or members of the public from appropriate living conditions or from living healthy and active lifestyles given the nature of the development and the strategic industrial location far removed from nearby residential receptors.

SECTION 106

Planning Obligations

10.1 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.

10.2 The proposal would attract the following Community Infrastructure Levy contributions to mitigate the impact of the development:

10.3 The Mayor's Community Infrastructure Levy (MCIL1) was introduced in 2012 to help finance Crossrail and on 1 April 2019 the new, replacement charging schedule (MCIL2) came into effect in order to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2. If approved, the proposed development would be subject to (CIL) applied at a rate of £25 per square metre of additional gross floor area.

10.4 The London Borough of Havering's CIL was adopted in September 2019. Office / Industrial development will attract a levy of £0 per sqm of net additional floor

space. If approved, the proposed development would therefore be subject to null (CIL) payment.

- 10.5 The applicant has provided a breakdown of the proposed buildings, which could result in the following CIL payments:

Mayoral CIL (MCIL2) : 3,500 sqm x £25 = £87,500

EQUALITIES

- 11.1 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
- 11.2 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.
- 11.3 Policy CG1 of the London Plan also seeks to support and promote the creation of an inclusive city to address inequality.
- 11.4 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.
- 11.5 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

- 12.1 The presumption in favour of sustainable development outlined in paragraph 11 of the National Planning Policy Framework (NPPF) is engaged.
- 12.2 All other relevant policies and considerations have been taken into account. It is therefore recommended that full planning permission should be APPROVED