

Strategic Planning Committee Developer Presentation 5th December 2024

Location:	Veolia Landfill, Coldharbour Lane, Rainham
Ward:	Rainham & Wennington
Description:	Extension to the operational life of the landfill and composting facilities, retention of all landfill buildings and infrastructure required for these operations before completion of the restoration of the site.
Case Officer:	Malachy McGovern

1.0 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 without prejudice and along with the comments received as a result of consultation, publicity and notification subject to full consideration of any subsequent application.
- 1.2 The proposal has been the subject to a pre-application meeting with officers. The proposal has not yet been presented to the GLA.
- 1.3 The scheme is for retention and continued operation of the existing landfill facility however further detailed reports including an Environmental Statement will be required to support any planning application submitted. At this stage however, Member feedback in regard to broad principles for the continuation of the landfill development will be constructive in taking the scheme forward.
- 1.4 Whilst the principle of the development has been established by planning consent P1566.12, that permission is explicit in its description and through conditions that the importation of waste should cease by 31st December 2024. The planning consent allows a further 2 year period (to end 2026) to import restoration material and, following that, an aftercare period of 5 years (to end of 2031) The applicant seeks a maximum of a 5 year extension to these periods including landfill operations and states that this is due to the national decline in the volume of waste going to landfill (and increase in recycling).
- 1.5 The applicant submits that an additional 5-year time period is essential in order for the additional waste volume to be achieved to infill the existing waste mound and to stabilise and complete the necessary mound contours.

2.0 SITE AND SURROUNDINGS

2.1 The Rainham Landfill and Composting Site covers approximately 161 hectares and is located in the eastern part of Greater London, on the northern bank of the River Thames. The site is situated southwest of Coldharbour Lane, which defines its northern, northeastern, and southeastern boundaries. Access to the site is provided via an unadopted highway connecting Coldharbour Lane to Ferry Lane and the A13 (Rainham Bypass), part of the strategic road network. To the west is the recently developed Momentum Business Park (Former Freightmaster Estate), while the Easter Industrial Park lies to the northwest.

2.2 The site is bordered by significant environmental assets. Directly to the north and northwest are the Inner Thames Marshes Site of Special Scientific Interest (SSSI) and the Rainham Marshes Local Nature Reserve (LNR), partially managed by the RSPB. To the south, a public footpath runs along the riverbank. Approximately 1.5 km to the west lies Wennington Marshes nature reserve, a large wetland area.

2.3 The nearest residential properties are located in Erith, approximately 870 m to the southeast, across the River Thames. Although the site is not within a conservation area and does not contain listed buildings or significant heritage assets, it is located within an Archaeological Priority Area.

2.4 The site's transport accessibility is very poor, with a Public Transport Accessibility Level (PTAL) of 0, the lowest rating.

2.5 In terms of policy designations, the site is within a Strategic Industrial Location (Havering Local Plan Policy 19) (small part of the site only), the Thames Policy Area (Policy 31), and Flood Zone 3a, indicating a high probability of flooding. It also falls under the SSA17 designation for the London Riverside Conservation Park and is located within the Rainham, Aveley, and West Thurrock Marshes Landscape Character Area as identified in the Land of the Fanns Landscape Character Assessment (2016).

3.0 THE PROPOSAL

Extension of Operations:

- Landfill and open windrow composting operations to continue until 31 December 2029.
- Restoration of the site to be completed by 31 December 2031.

Retention of Infrastructure:

- Landfill buildings, soil treatment facilities, and supporting infrastructure to remain operational throughout the extended period.

4.0 PLANNING HISTORY

4.1 **P1566.12** (Approved with conditions, 22 September 2016) Planning application for the continuation of waste inputs and operation of other waste management facilities, including a materials recycling facility, waste transfer station, open-air composting site, associated soil plant, gas engines, leachate treatment plant, and incinerator bottom

ash processing, until 31 December 2024. The application also included the re-profiling of final contours.

P0070.23 (awaiting completion of S106 Agreement) Continued operation, redevelopment and expansion of the existing Plastics Recycling/Recovery Facility, Materials Recycling Facility buildings with vehicle depot and associated landscaping and parking [Application covers part of the wider site]

P0718.23 (awaiting completion of S106 Agreement) Retention and continued operation of the compound area consisting of existing gas engines, and leachate treatment plant beyond the end of 2024. The compound area serves to manage the gas and leachate from the adjacent landfill [Application covers part of wider site]

5.0 CONSULTATION

5.1 Members should note that the proposal being presented to them is for continuation of the existing facility and that there would be no new construction of infrastructure on site.

5.2 It is intended that the following will be consulted regarding any subsequent planning application:

- Mayor of London
- London Fire Brigade
- Thames Water
- Transport for London
- Place Services (Ecology)
- Environment Agency
- London Borough of Bexley
- Thurrock Council

6.0 COMMUNITY ENGAGEMENT

6.1 There has been no community engagement thus far.

7.0 MATERIAL PLANNING CONSIDERATIONS

7.1 The main planning issues raised by the proposal relate to:

- Principle of Development
- Proposed site layout and function
- Design Quality and Scale
- Environmental Impacts
- Access and parking
- Energy and Sustainability

7.2 Principle of Development

7.2.1 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.

7.2.2 Whilst the principle of the landfill use has been established and deemed acceptable by the extant and live permission ref. P1566.12, this was for a temporary period (to

December 2024) to enable the approved landform to be created. Therefore, a fresh look at the proposal and reconsideration of the scheme against the current development plan policies and NPPF is considered appropriate.

7.2.3 Sustainable Development (Paragraphs 7-14): The NPPF 2023 emphasizes the importance of sustainable development as a central objective of the planning system. The continuation of landfill and gas engines and equipment on part of the site aligns with these objectives by promoting efficient resource way of capturing waste gas, contributing to energy needs and the economic, social, and environmental goals outlined in the NPPF's sustainable development priorities.

7.2.4 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. Detailed national policies are contained in National Planning Policy for Waste (2014) – this states that waste management should follow the waste hierarchy with disposal as a last resort. Further, when determining planning applications, planning authorities should ensure that landfill sites are restored to beneficial after uses at the earliest opportunity.

7.3 Design, Quality and Scale

7.3.1 There would be no new buildings or structures on site other than the existing landfill mound. The 12 ancillary gas engines and compound area for dealing with gas and leachate are existing and would also be retained on site.

7.4 Environmental Impacts

7.4.1 Policy W5 of the Joint Waste Development Plan (JWDPD) forms part of the Havering Development Plan and states that the policy focuses on ensuring that any waste related development will not generate significant impacts on people, the environment and resources. The policy lists a number of adverse impacts that should be avoided or minimised and if necessary mitigated.

7.4.2 Importantly, the proposal is not for a new waste related development but for the retention of existing landfill and associated gas engines and associated equipment intended to be continuously operated beyond the end of 2024 (until end of 2029) for waste management purposes.

7.4.3 Given that the landfill and compound area is proposed to continue operating as existing, the potential for impacts in the future would need to be assessed as part of any application. The applicant submits that importantly the compound area will be operated and managed in accordance with an Environmental Permit, which will continue to be monitored by the Environment Agency.

Noise & Air Quality

7.4.4 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 effects or impacts since the operations began post 2012. The operational plant and machinery would be the same as existing and no material change in use or processes would occur.

7.4.5 The applicant submits 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 given the distance from residential receptors.

7.4.6 London Borough of Havering was declared an Air Quality Management Area in 2006. The planning application proposal will require an Air Quality Assessment as part of the Environmental Statement.

7.5 Access and Parking

7.5.1 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.

7.5.2 There would be no material change in the equipment used nor the total amount of material deposited on the site – therefore the total cumulative vehicle movements would not increase, although the period over which those vehicle movements will take place would be longer.

7.5.3 Existing staff parking and a service yard for refuse vehicles would be retained.

7.6 Energy and Sustainability

7.6.1 The applicant submits that the gas engines help to minimise the greenhouse gas emissions, particularly because their purpose is to extract and capture the landfill gas (consisting of methane gas and carbon dioxide) and then process it. The processed gas is turned into electricity which contributes towards the National Grid energy supply to a wider network of power users. Therefore, part of the existing compound area serves to be green and an energy source. Therefore, the planning application proposal is supported by Policy SI 2 and Policy SI 3.

7.6.2 Policy SI8 Waste Capacity and Net Waste self-sufficiency deals with waste self-sufficiency for new and existing sites. The applicant submits that the application site is an essential part of London's waste management infrastructure and remediation will continue to be after the landfill is restored and beyond.

8.0 **CONCLUSIONS**

8.1 At this stage, Members' considerations and comments on the proposed continuation of the existing use will be most helpful to incorporate as the various elements of the proposals are brought together.