

CABINET

17 September 2025

Subject Heading:

Launders Lane (Arnold's Field)

Cabinet Member:

Cllr. Ray Morgon, Leader of the Council

ELT Lead:

Helen Oakerbee, Director of Planning and Public Protection

Report Author and contact details:

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Policy context:

Public Protection and Public Health.

Frequent, ongoing fires at the privately owned Arnold's Field cause smoke/pollution affecting the health and quality of life of local residents.

Financial summary:

The Council has incurred overall direct and indirect costs in responding to matters/ concerns at Arnold's Field – £949K to March 2025, estimated £604K in 2025/26, plus further in 2026/27 onwards.

Subject to decisions made on the status of the land and any works in default, there may be significant additional costs in the future.

Is this a Key Decision?

No.

When should this matter be reviewed?

November 2026

Reviewing OSC:

Place Overview & Scrutiny Committee

People Overview & Scrutiny Committee

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

People – Supporting our residents to stay safe and well. ✓

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

Resources – Enabling a resident-focused and resilient Council.

MOTION RECEIVED

Motion 23/07/25

The following motion (as amended) was agreed at Full Council on 23rd July 2025:

“Given the significance and impact on residents who live near Launders Lane, together with the impact on the general environment and the outcome of the recent judicial review, this Council calls for a report to be presented to Cabinet at its meeting in September 2025, of how the administration plans to rectify the situation in Launders Lane.

Such a report should include amongst other items, an issue log, risk analysis, costings, communication plan, key stakeholder analysis, key milestones and a detailed action plan with associated timescales. This report to be in line with good project management practice.”

REPORT SUMMARY

Summary

In response to the motion agreed by Full Council, this report describes the history of Arnold’s Field; the investigations initiated by the Council in response to the fires on the site; and proposed options to stop the fires currently under consideration.

The Council acknowledges and understands the concerns from residents and recognises that the volume of fires being experienced, having to close their windows (due to the smoke) for extended periods of time and having to lose use of their gardens and local parks in the summers is not acceptable. The Council also recognises that the recurrent fires have an impact on the physical and mental health of local residents.

The Council continues to do all it can to find a solution to stop the fires (and associated smoke) and to ensure that those legally responsible for resolving the situation do so as quickly as possible. However, the situation remains complex.

Arnold’s Field on Launders Lane, Rainham, RM13 9FL (the “Site”) is privately owned and, between circa 2002-2014, the site was subject to illegal activities, including significant fly tipping, firearms storage and drug cultivation. The volume of illegal waste dumped, combined with the Site not being managed in the manner of an authorised landfill, is the root cause of the present ongoing

fires and smoke. However, visible fires did not become a significant annual occurrence at the Site until the summer of 2019.

From 2004 to 2018, a range of enforcement action was taken in relation to the site by the Council, Environment Agency and the Metropolitan Police. This included the serving of Planning Enforcement and Stop Notices and with individuals being prosecuted and sentenced to prison. Further enforcement action was taken by the Council in 2024 with the serving of an Abatement Notice and a Community Protection Warning on the current landowner.

Between 2022 and 2025, the Council also carried out air quality monitoring, commissioned an intrusive soil investigation, arranged testing of the watercourse, sampled for asbestos in the air, analysed health impact data and has explored options for stopping the fires. Discussions have also been held with expert/scientific advisers, national agencies, the landowner, local residents, the local MP, the Greater London Authority and the London Fire Brigade.

Following analysis of the air quality monitoring results, officers concluded that pollution levels, as a result of the Site, had not breached the World Health Organisation's Air Quality guideline values, nor the UK's current legal requirements regarding air quality. Equally, officers concluded that these limits were not helpful in assessing the impact of the fires on the health of residents living around Arnold's Field.

Although initial appearances suggested that the fires originated at the surface as a result of human action (eg. discarded glass or arson), officers latterly came to the view that the vast majority of the more recent fires start in materials underground and that the most effective means of stopping these "subterranean fires" (technically smouldering hotspots underground) is to prevent oxygen from reaching below the surface.

Following the judicial review ruling in June 2025, the Council has continued to carefully consider the available information, data and evidence and is in the process of making a new decision on whether or not the site should be determined as "Contaminated Land" under the Environmental Protection Act 1990.

If the Site is formally designated as "Contaminated Land", the Council would be required to enter further discussions with the landowner prior to the service of a Remediation Notice to address significant contaminant linkages. If the Site does not meet the threshold for designation as "Contaminated Land", the Council will serve an Abatement Notice on the landowner to abate the nuisance from smoke and to take the necessary steps to stop the fires.

Any substantial works to stop the fires may take 3-7 years but it may be possible to achieve an effective (albeit interim) stop to the fires within 6-12 months.

RECOMMENDATIONS

Cabinet Members are asked to:

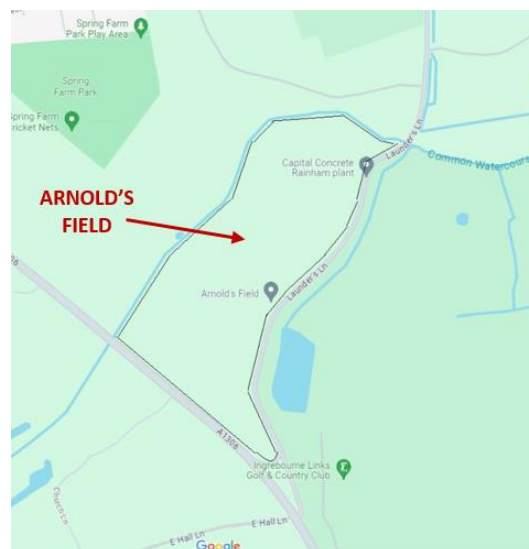
- Note the report in general.
- Note, in particular, the actions taken to date and possible future actions.
- Note, in particular, the costs to the Council to date and potential future costs/risks.

REPORT DETAIL

1. Background

Location

- 1.1 The Site at Arnold's Field, Launders Lane, Rainham, RM13 9FL has become known – in recent years – for repeated fires, particularly during warmer weather.
- 1.2 The smoke arising from these fires impacts on the quality of life of the local Rainham residents and concerns regarding the effect on their health have also been raised.
- 1.3 The site is located at the junction of Launders Lane and New Road (A1306) – see location map – and is bounded by Launders Lane to the east, New Road to the south and a Common Watercourse to the north and west.



General History

- 1.4 A list of key dates in relation to the history of the site is given in Appendix 1.
- 1.5 The site, within the Metropolitan Green Belt, is privately owned but has had a series of different private owners over the years with the current ownership from August 2017. The Site was previously a legal landfill (1960s/70s) and it is understood that the landfill was

managed and “sealed” at ground level (in line with the practices/ standards at the time) at the end of its period of lawful operation.

- 1.6 In 1999/2000, the Council granted planning permission for the importation of inert waste and soils – initially for agricultural purposes then as community woodland. However, over the subsequent fifteen years (at different points), a significant excess of material (a mixture of industrial, commercial and household waste – apparently including “non-inert” waste) was deposited. It is unclear whether or not this was done with the knowledge of all the landowners over that period of time. That material was also not properly compacted thereby allowing decomposition of the waste in a manner which leads to combustion (and fires/smoke) in certain circumstances. It is understood that material was dumped at the site up to around 2014 (when vehicular access was ceased).

Public Authority Enforcement

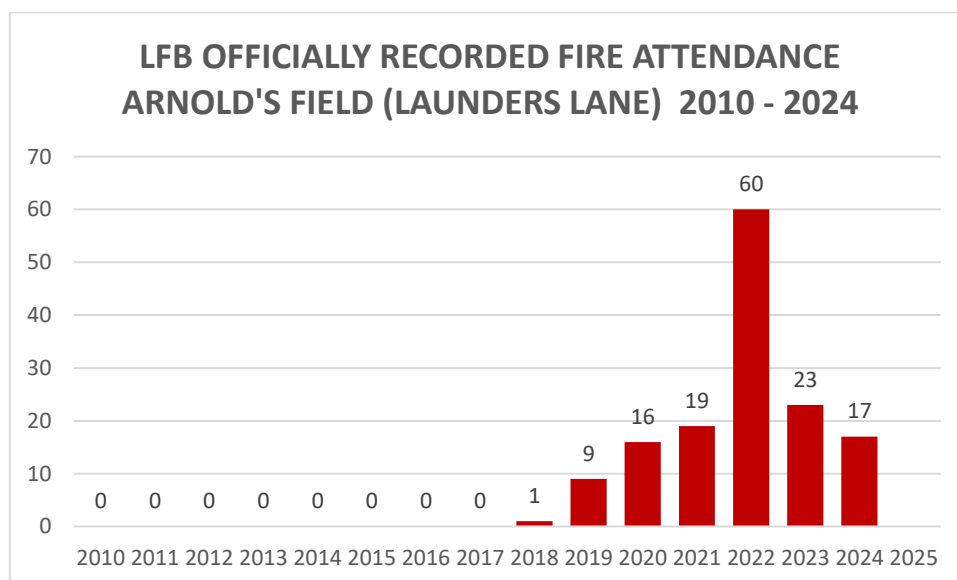
- 1.7 The Environment Agency (EA) is the authority responsible, from 1996, for prosecuting unlawful dumping (fly tipping) of the magnitude experienced at Arnold’s Field.
- 1.8 From 2003 to 2018, enforcement action was taken in relation to the site by relevant public authorities, including the Council, the EA and the Metropolitan Police (MPS).
- 1.9 The Council investigated the extent of excess material brought onto the Site in 2003, issued Planning Enforcement and Stop Notices in 2004 (upheld by the Planning Inspectorate, on appeal, in 2005) and explored further legal action (under the planning regime) in 2010.
- 1.10 Criminal prosecutions were also pursued by the MPS (2011) for drugs and firearms offences and the EA (2017-19) for fly tipping offences resulting in six figure fines and prison terms of up to twelve years.
- 1.11 There was additional fly tipping from 2011 until the main gate was installed in 2014. However, it was not feasible for the Council to pursue enforcement action against the landowner during the period after 2011 as he was in prison for some years, there was no further major dumping after 2014 and the Site was then sold in 2017.
- 1.12 There was no further bulk dumping after 2014 but, due to the smoke from the fires, the Council then issued, in April 2024, a Statutory Nuisance Abatement Notice and a Community Protection Warning to the current landowner. The Abatement Notice was subsequently withdrawn in September 2024 and a requirement made that the landowner would submit clear actions (to a timescale) to stop the fires at the site. Those timescales were not met but it was decided to await the outcome of the judicial review which had been

commenced by that time (see paragraph 2.24 below and onwards) before pursuing further action.

2. Council Action

Fire Data

- 2.1 Post pandemic and following the steep rise in the number of reported fires in 2022, the Council embarked on a process to understand the cause of the fires and the impact on the local community.
- 2.2 Local residents have said that fires had been happening at the site for 20/25 years but London Fire Brigade data suggest that regular and repeated fires began in the summer of 2019. However, it is noted that LFB might attend the Site in response to smoke or smouldering but may not record that attendance as a “fire”.
- 2.3 In addition, the 2012 Jacobs Site Investigation Report (commissioned by the Environment Agency – following an EA site visit in August 2011) does not mention fires, smoke or charring at all but does note that excavated waste was “frequently observed to be warm and emitting vapour, suggesting decomposition and the production of landfill-type gases” and noted that “snow melt frequently occurred ... suggesting decomposed waste was warming the overlying ground”. The EA, in commissioning the investigation, did not identify that there were active fires at the Site.



- 2.4 Fire incident data from the London Fire Brigade (LFB) – from 2010 onwards – show no officially recorded fires at the Site prior to 2018. The fires were normally in the summer period (peaking in the exceptionally hot temperatures of 2022) with notable numbers each year from 2019. However, fire crews do attend on a greater number

of individual occasions responding to “smoke only” calls and managing “controlled burns” (ongoing fires).

- 2.5 With very few fires reported (officially recorded as primary or secondary fires by LFB) from the site prior to 2019 (see table above), it was only when, between 2019 and 2022, the annual number of fires began to rise (in line with increasing summer temperatures) that a pattern started to emerge and a clear problem was recognised.
- 2.6 It should also be noted that there were not many formal complaints made to the Council about fires at Arnold’s Field in that period. Records indicate that there was 1 complaint made in 2019, 6 in 2020, and 3 in 2021. However, 35 complaints were received in 2022 – which was also when the Wennington fire occurred and there was an increase in the number of wildfires being dealt with by LFB across the capital.
- 2.7 This uptick in reported fires prompted the Council to start its investigations around the Site.

Scientific Study

- 2.8 The Council has worked and engaged with a wide range of partner agencies (see Appendix 2) and has taken a significant amount of action and expended a considerable amount of financial and human resource in seeking to address the problem. These actions have included:
- air quality monitoring
 - investigating and testing the soil
 - investigating and testing ground gases and ground water
 - initiating the testing of the watercourse
 - investigating and testing for asbestos in the air
 - requesting, compiling and analysing health impact data (using NHS information)
 - liaising with landowner and fire brigade to minimise the impact of fires (by improving fire-fighting access to the site etc.)
 - liaising with residents both in a larger forum and in smaller 1:1 meetings, to hear their concerns, share findings and inform further action
- 2.9 A key early step was the establishment of a Technical Sub-Group to bring together experts in the fields of air quality and public health (amongst others) in order to advise on the design of a health risk assessment and the collation/interpretation of data and in order to identify the extent to which the fires contribute to the levels of air pollution (short/long term) and the evidence of direct impacts on the health of residents.

- 2.10 The Technical Sub-Group oversaw the air quality/pollution monitoring methodology, analysis, interpretation and reporting from the Imperial College Environmental Research Group (Imperial-ERG) (as part of the Breathe London project) and from the Transport Research Laboratory (TRL). All reports from Imperial-ERG and TRL have been published, their data discussed at the public meetings and are available on the Council's website.
- 2.11 The Council commissioned and supported the establishment of a ring of air quality monitoring nodes for PM_{2.5} and NO₂, through the Breathe London network, around the site. These "Clarity" nodes were installed primarily in nearby residential areas. Imperial-ERG assessed the data from the nodes. Their assessment concluded that, despite the frequent large but short-lived peaks of particulate air pollution, "there is no observable difference between the levels detected at monitoring around Arnold's Field and the immediate wider area, or across London" and that "there is no evidence that any UK limits are being broken currently". It is noteworthy that UK and international thresholds relate to longer time periods, the shortest of which is a daily (24 hour) limit.
- 2.12 The Council also commissioned a second contractor (TRL) to monitor the levels of specific pollutants – Volatile Organic Compounds (VOCs), Poly Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs) and Heavy Metals (Mercury and Lead). These were monitored through a ring of air quality 'Tenax' tubes and two static monitoring stations. The pollutants assessed were based on sector expertise and previous experience as to what compounds are likely to be produced by combustion at the site. Their assessment concluded that, based on annual averages, there are no exceedances of UK or World Health Organisation (WHO) thresholds (where they are available) and, for the compounds with no UK/WHO thresholds, comparisons were made with historical datasets. The Launderers Lane sampling showed lower levels than the comparator datasets. These monitoring locations gave monthly averages of the pollutants being evaluated, and did not have the capacity for more granular analysis.
- 2.13 In 2023, the Council commissioned an intrusive investigation of the contents of the soil at the site – including examination of underground gases and water/liquids. The analysis identified the presence of volatile organic compounds, methane and other gases. The report recommended that the site be secured to "prevent unauthorised access" and that the site be capped so as to prevent fires by "starving any combustible material of oxygen" underground.
- 2.14 In 2024, the Council commissioned an airborne asbestos study around Arnold's Field – in Spring Farm Park and along the New Road – to investigate the release of any asbestos fibres from the

Site. During the study by the UKAS accredited consultant, there was smoke emanating from the site, however no asbestos fibres were detected within the samples collected.

- 2.15 In 2024, to reassure residents, the Council requested the National Disease Registration Service (NDRS) to analyse the rates of three cancer types potentially associated with exposure to air pollution (lung cancers, haematological cancers [such as leukaemia] and brain cancers), as well as mesothelioma (a type of cancer usually linked to asbestos exposure). The NDRS reported that cancer rates around Arnold's Field were not statistically different from the rest of the Borough.
- 2.16 In 2024, the landowner enhanced the security at the site with fencing and a secondary gate in the south-east corner. With unauthorised access prevented, the indications to officers were that the ongoing fires were therefore most likely as a result of subterranean activity (spontaneous combustion, with the presence of oxygen, of decomposed/degraded underground compounds) or grass fires igniting waste below the ground rather than human activity at the surface (eg. due to further fly-tipping or arson).
- 2.17 In 2024, the Council concluded a study – with guidance from environmental epidemiologists at Imperial College – on the Acute Respiratory Health Impacts of Fires around the Site. This involved examining NHS healthcare data to identify any temporal relationship between occurrences of fires at the site and the use of healthcare services for respiratory symptoms/illness amongst residents living close to the site. The report found that there was a statistically significant increase in the number of patients with pre-existing long-term respiratory conditions (such as asthma and COPD) attending the GP surgery on the day of a fire attended by LFB. However, amongst the general population, no statistically significant impact of "fire days" on GP visits, prescriptions issued, A&E attendance or hospital admissions for respiratory illness/symptoms was shown. This was the case on the day of the fire as well as the cumulative three and seven day periods following a fire event. This is in line with international consensus that those with pre-existing respiratory health concerns are at increased risk of the effect of particulate matter/poor air quality.
- 2.18 In 2025, the Council received the results of an options appraisal exploring different methodologies to stop the fires by way of preventing oxygen transfer from the surface to underground waste. These methodologies have already been explored with the landowner through informal discussions and include a temporary solution (would take around six months to implement and would initially last for 1-3 years) and longer term "permanent" solutions (which could take 2-4 years to implement).

Health Impact

- 2.19 In addition to the epidemiological studies mentioned above, residents report a wide range of physical symptoms and attribute a variety of health conditions (headaches, coughing, streaming eyes etc.) to 'toxic smoke' emanating from fires at Arnold's Field.
- 2.20 Residents also report mental health impacts and loss of amenity resulting from repeated fires (and repeated shelter indoors advice) meaning that they cannot use their gardens or ventilate their houses by opening windows and that the smell of smoke permeates their properties and belongings.
- 2.21 This evidence, although anecdotal, is frequent, received from several sources and consistent with elements of the scientific evidence base.

"Contaminated Land" (EPA 1990)

- 2.22 Part 2A of the Environmental Protection Act 1990 governs the definition and designation of "contaminated land". Deciding that a site is "Contaminated Land" is called a "determination" and the Government (through the Dept. of Environment, Food and Rural Affairs – DEFRA) has issued Statutory Guidance to assist local authorities in their decision making.
- 2.23 In April 2024, the Council assessed the information available at the time and, following its understanding of the perspectives amongst professionals in the field, made the decision that the Site did not meet the requirements to meet the definition of Contaminated Land within the meaning of the Act. Following the expiration of the subsequent election period, the decision was made known publicly through the Launders Lane newsletter in mid-July 2024 with the Council also saying that, as further information became available, the decision would be reviewed.
- 2.24 In October 2024, a request for a judicial review (JR) of the Council's decision was lodged with the courts from an organisation (as claimant) called "Clear the Air in Havering". That JR was heard in the High Court in March 2025 and the judge issued their ruling in June 2025.
- 2.25 Although three of the five grounds of the JR were dismissed, the judge's ruling on the other two grounds was in effect that, in making its (first) decision, the Council should have waited for more data to be available (from the air quality monitoring) and should have considered whether airborne contamination (ie. smoke from the fires) was capable of giving rise to the land being "Contaminated Land" under the Act and Statutory Guidance.

- 2.26 In the period since July 2024, the Council has been collating and assessing additional relevant information but had awaited the outcome of the JR before proceeding with a new/second decision.
- 2.27 Following the JR ruling, officers are now reassessing the relevant information and finalising materials in order to be able to make a new Part 2A decision. Following the Council's determination, subsequent enforcement action – whether through the Contaminated Land Remediation route or the Statutory Nuisance Abatement route – is likely to follow to oblige the landowner to take steps to stop the fires at the Site.
- 2.28 It will be the responsibility of the landowner to decide on and implement the necessary lawful, suitable and effective measures to resolve the situation within the required reasonable timescale.
- 2.29 It should be noted that, whichever Part 2A decision the Council makes, the result could be subject to a further judicial review from an interested party or the previous JR claimant (if the decision is “not contaminated land”) or an appeal by the landowner (if the decision is that the Site is designated as “contaminated land”).
- 2.30 In addition, if the Part 2A decision is that the site is not identified as Contaminated Land, and a subsequent Abatement Notice is served, then (as was the position last year), the landowner may decide to appeal that notice as they did in 2024 (see below). This would mean that the notice is suspended until the appeal is heard by the courts, which could take several months.

Statutory Nuisance and Community Protection

- 2.31 In April 2024, following the then decision that the Site was not “Contaminated Land” under the Act, officers considered what other steps could be taken to address the fires and the impact that the smoke was having on local residents.
- 2.32 Having considered the complaints received from residents, it was decided that a statutory nuisance was likely being caused by the smoke and was likely to recur. When the Council is satisfied that a statutory nuisance is occurring, or likely to be occurring, it is obliged to serve an Abatement Notice. Such a notice was served, in late April 2024, on the landowner requiring them to abate the nuisance by executing any necessary works or taking any steps needed to address the smoke.
- 2.33 It should be noted that an abatement notice cannot be served when a Site is designated as “Contaminated Land” if the nuisance is arising due to the contamination.
- 2.34 It was also decided that the landowner's lack of action, up to that

point, to curtail the fires was having a detrimental effect on the quality of life of others in the locality and causing an unreasonable burden on the London Fire Brigade. Consequently, a Community Protection Warning (CPW) was also served in late April 2024 on the landowner to prevent unauthorised access to the Site, to require the landowner to inform the Council how they would be preventing fires from occurring on the Site and to provide all reasonable assistance to the LFB to deal with any fires which did occur on the Site.

- 2.35 It is not possible to appeal against a CPW and the landowner did not carry out the actions in the timescales set out in that Warning. However, following a joint visit to the Site in September 2024 with the Council and LFB, he did later (November 2024) install a secure vehicular gate to prevent access through the south-east opening and created a hard standing inside so that fire engines could manoeuvre to fight the fires.
- 2.36 The landowner appealed against the Abatement Notice which suspended the requirements of the notice until the outcome of a court hearing. Having considered the grounds of the appeal and, following a series of positive meetings with the landowner which improved dialogue, officers decided to withdraw that Abatement Notice. Due to the public campaign around a judicial review already gaining ground, rather than issuing a further abatement notice, a letter was instead sent to the landowner in September 2024 setting out two key requirements.
- 2.37 Those two requirements were that the landowner should:
- a) confirm, by 31st December 2024 (and to the Council's satisfaction), what substantive actions he would be taking to abate the smoke from the Site;
 - b) complete any works/actions by 30th April 2025.
- 2.38 Because the Council had not heard from the landowner or his agent by the end of 2024, a chasing letter was sent to the agent, who replied in February 2025 that they had written to the Council in December 2024 referencing the secure vehicular gate but not proposing any actions/works to stop the fires (other than their intended planning application to redevelop the Site). That letter was not received at the time it was first sent.
- 2.39 By the time of the second deadline (April 2025) no further proposal for works had been received.
- 2.40 In parallel, joint discussions had begun in February 2025 between the Fire Brigade, Council and landowner to produce a Memorandum of Understanding (MOU) principally to enhance fire-fighting at the Site. This MOU was finally agreed and went into official effect from July 2025.

- 2.41 In addition to the MOU discussions, informal meetings took place between the Council and the landowner in May and August 2025 where the Council outlined the possible steps that could follow the judicial review ruling – including the service of a new Abatement Notice.

Planning

- 2.42 In October 2018, the landowner submitted a pre-application enquiry as to future use of land – this was responded to by the Planning Dept. in December 2018. Following further communication in 2019 and 2020, the fee for a new pre-app meeting was paid in October 2021 and, since then, the landowner has engaged with the Local Planning Authority through seeking pre-application advice to develop the site as a depot.
- 2.43 Appropriate advice has been given in regard to the green belt status of the land and other relevant applicable planning policies that will need to be considered should a planning application be submitted.
- 2.44 The landowner has more recently (2025) commissioned planning consultants to advise on Environmental Impact Assessment (EIA) screening requirements and an ecologist to advise on biodiversity matters. Officers have requested further information in regard to EIA screening.
- 2.45 Due to the indicative size of the development being considered by the landowner, a significant amount of supporting material would likely be necessary to be submitted as part of any planning application. To date, officers have advised that they do not consider that there is a significantly strong enough case to justify a development of the size and nature currently suggested, but continue to feedback to the landowner. It should also be noted that, subject to the quantum of development proposed, the application may be referable to the Mayor of London who has powers to direct refusal of any application.
- 2.46 Nevertheless, it should be noted that the landowner maintains that the only feasible (affordable) means by which action could be taken to stop the fires at the site is through a grant of planning permission for development of the Site on a commercial basis to provide a plant hire depot. However, to date, he has not yet submitted a full planning application.

3 Approach to “Rectifying the Situation”

Context

- 3.1 As detailed above (and in Appendix 2) the Council’s activity in relation to the site prior to 2022 was primarily either around planning enforcement or in reference to prosecutions by the EA or MPS.
- 3.2 The Council’s more comprehensive approach to its actions to “rectify the situation” began in 2022 and, since then, has broadly been in two phases:
- Phase 1 – Understanding Causes & Impacts
 - air quality monitoring
 - health impact analysis
 - land/soil investigations
 - water quality monitoring
 - asbestos monitoring
 - Phase 2 – Identifying/Pursuing Solutions to Stop the Fires
 - security of site (extra gate/fencing)
 - explore options to prevent oxygen reaching underground waste
 - oblige landowner to take action to stop fires
- 3.3 To ensure the swiftest possible progress, some of the activity within individual phases was carried out concurrently and some elements in both phases were being conducted at the same time.
- 3.4 Having first prioritised checking and confirming the extent of any pollution and whether it breached the relevant health thresholds, the focus of attention moved from Phase 1 to Phase 2.
- 3.5 Initial explorations of the sources of combustion suggested a mix of fires that originated both at the surface and from underground. However, officers subsequently took the view that, whilst there were materials burning at the surface, the origins of those fires are more likely to have been subterranean. This was later reinforced when the number of fires and smoke incidents continued to occur at previous levels despite no new material entering the Site (due to enhanced security) and the previously existing material at the surface having largely already been burned.
- 3.6 Furthermore, with the improvements in security at the Site now making it inaccessible and in the light of public knowledge about the condition of the land, the likelihood of fires now being caused by human action (inadvertent or otherwise) is, in practice, negligible.
- 3.7 It should be noted that, whilst the term is used to illustrate the point, there are no “subterranean fires” because there are no flames underground. Technically, they are “hotspots” where the

temperature of the waste rises because of oxygen ingress which allows aerobic degradation of the waste. If the rate is high enough, and the heat cannot escape, the waste starts to smoulder.

- 3.8 As “subterranean fires” (smouldering hotspots) still require air/oxygen to burn or smoulder, it was concluded that preventing the passage of oxygen from above ground to below ground is the most practical approach to inhibiting future combustion.
- 3.9 Therefore, in discussion with expert advisers, options around capping the site, and more novel approaches (including hydro-mulching and liquid clay injection) have been explored as possible means of preventing the passage of oxygen.

Recent Activity

- 3.10 Over the past nine months, the focus of activity has been on addressing the issues raised by the judicial review about the first Contaminated Land decision, made under the provisions of Part 2A of the Environmental Protection Act 1990. This has been a resource intensive and time consuming process which has involved collating the necessary additional technical information (asbestos, respiratory health, air quality, and employing a specialist land quality consultant) and analysis to make a new Part 2A decision in tandem with considering further action that may be required (eg. serving a further abatement notice for statutory nuisance) and obtaining expert advice on the most effective means to stop the fires.
- 3.11 A Memorandum of Understanding was also developed between the London Fire Brigade, landowner and Council to improve fire-fighting abilities (ie. controlled LFB access into the Site) and to inform the Council when fires are taking place.
- 3.12 In light of the disappointing response from the landowner to the requirements set out by the Council around the withdrawal of the previous Abatement Notice, informal meetings have been held (May and August 2025) with the landowner to outline the actions that may now follow.
- 3.13 The landowner has indicated his primary preference to pursue his wish for redevelopment of the Site but, whilst the Council has provided comments on the documents submitted to date (a draft Environmental Impact Assessment and a list of Very Special Circumstances), a full planning application has still not been submitted.

Next Steps

- 3.14 Once all available technical information has been collated and assessed, officers will make a decision – in accordance with the

Contaminated Land Statutory Guidance – on whether the site meets the thresholds for determination as “Contaminated Land” within the meaning of Part 2A of the Environmental Protection Act 1990.

- 3.15 If the decision is “yes”, the Council would then need to have further discussions with the landowner before issuing a Remediation Notice (on them and on any other interested parties) to stop the “contaminant linkage”.
- 3.16 Failure to comply with the requirements of any Remediation Notice can result in the prosecution (with a maximum unlimited fine plus a daily cost for failure) or an imposition of the Courts to comply with the notice. The Council can also carry out works in default for the compliance of the Remediation Notice, for which the costs can be recovered.
- 3.17 If the decision is “no”, the Council would then be able to separately assess if a statutory nuisance is occurring and serve a new Abatement Notice on the landowner to stop the “statutory nuisance”.
- 3.18 Failure to comply with the abatement notice can also result in prosecution (with unlimited fines), carrying out works in default to resolve the matter (with costs recharged).
- 3.19 Service of an Abatement Notice could be subject to an appeal by the landowner irrespective of the decision made by the Council which would delay any steps to remedy the situation at the Site.
- 3.20 Whichever Notice is served, the subsequent key milestones would be for the landowner to:
- decide on which measures to use to stop the fires
 - including providing details of a full programme of works
 - achieve the necessary permissions/licences
 - carry out the works within an agreed timescale
- 3.21 It may be that some form of temporary measures (perhaps lasting one to five years) may be achievable to bring in a relatively quick (within one year) cessation or substantial reduction in the frequency of the fires pending action by the landowner to permanently prevent the fires.
- 3.22 Consequently, given the beneficial impact of the cessation of the fires in the shortest possible time span, consideration should be given to public authorities (for example, the Council, the Greater London Authority the Environment Agency and/or DEFRA) providing some level of financial support to the landowner for this specific purpose. Such financial support, if feasible, could be in the form of a grant, a loan or a charge on the property.

- 3.23 If the landowner does not enact a solution (temporary or permanent), the Council will then seek to enforce against them and/or take action itself and seek recovery of payment from the landowner.
- 3.24 Nevertheless, it should clearly be noted that, whatever Part 2A decision is made or whichever Notice might be served, the onus will be on the landowner to take action to address the condition of the Site and stop the fires. His view currently appears to be that a planning application and subsequent development (which he estimates could take 7 years from the date of any final approvals).

4 Direct Costs to the Council (exc. Staffing)

- 4.1 Since 2022, the Council has incurred direct costs (to March 2025) of around £280K. The majority of those costs were in Public Health – principally air quality monitoring/studies. However, in later years, costs have also been borne by the Public Protection Service in relation to exploring the options to prevent the fires, responding to legal action and receiving legal advice.
- 4.2 For 2025/26, initial costs of up to around £200K are currently expected. The majority of those costs will be in Public Protection – principally legal costs associated with the Part 2A decision. There may also be additional costs associated with any further legal challenges (ie. pertaining to the new Part 2A decision or Abatement Notice).
- 4.3 For 2026/27 onwards, there will be further costs – currently £15K annually (air quality monitoring) and perhaps an additional £60K annually for 24-hour “Statutory Nuisance Summer Cover” by suitably trained officers, overseen by Environmental Health. There may also be additional costs associated with any further legal challenges (ie. pertaining to the new Part 2A decision or Abatement Notice).
- 4.4 However, most significantly, if the landowner does not take the necessary steps to comply with the remediation or abatement notices (dependent on decisions outlined in the Next Steps section above) then the Council could exercise its powers to carry out “works in default”. A desk study carried out by consultants commissioned by the Council has indicated that such costs could be around £4-10M for a permanent solution (soil capping the site) or around £300-500K for a temporary solution (polymer hydro-mulching).
- 4.5 An alternative for 2026/27 and 2027/28 could be that, as outlined above to facilitate a speedy (albeit interim) resolution, public authorities could consider providing financial support for the works by the private landowner to achieve a temporary solution to the fires. As such, the Council has embarked on discussions with the GLA and Environment Agency and intends to do similar with DEFRA.

This would be on the basis that responsibility for the Site lies with the landowner and any financial support may be in the form of a loan and/or a charge on the land. Once the Council has made its decision on the Part 2A determination, letters will be sent to the agencies above setting out the position and “the ask”.

5 Project Management

Discovery Stage

- 5.1 The Council’s activity in relation to responding to the issues at Arnold’s Field could be described as being at the “discovery” stage which is often defined as the “crucial preliminary stage where a project’s overall goals, requirements and feasibility are thoroughly investigated and defined before significant resources are committed”.
- 5.2 The discovery stage also provides the opportunity to carry out an exploration of background issues to help filter and focus thinking to produce recommendations for moving forward. It therefore helps to set the foundation for the entire main project ahead.
- 5.3 The main project ahead would, in effect, be where the landowner is planning and executing the works. The Council, at that stage, would fulfil a monitoring role.

Communications and Stakeholders

- 5.4 Since 2022, the Council has developed arrangements for engaging and communicating with both residents and a variety of key stakeholders.
- 5.5 The arrangements for residents now include public meetings (occurring at least annually), occasional meetings between senior representatives of the Council and the local community grouping (“Residents Against Pollution” – RAP) and an occasional – as circumstances arise – newsletter (thirteen editions since 2023).
- 5.6 The arrangements for key stakeholders include quarterly Partners’ meetings and, in addition, there is frequent liaison by Council officers with LFB, RAP leaders and the landowner.
- 5.7 The Technical Subgroup also held standing monthly/six-weekly meetings up until December 2024 with an option to reconvene ad hoc if required.
- 5.8 There has been a great deal of media coverage on Launders Lane, from local and regional, to national and international media. As well as local media (Romford Recorder and The Havering Daily), the

issue has been covered by outlets including BBC TV and Radio, ITV, Sky News, CNN and The Guardian.

- 5.9 Residents have also shared the impact on their lives through social media posts and comments, particularly in the 'Launders Lane CRISIS' Facebook group. This has allowed the Council the opportunity to further communicate what action has been taken as well as providing the Council a valuable method of understanding residents' concerns and sentiment.

Actions, Milestones and Potential Timescales

- 5.10 On the basis that the "project" is at the discovery stage, the key high level milestones, past and future, in the timeline (including different potential paths) could be as outlined in the list below:
- 2022 = air quality monitoring
 - 2023 = environmental assessment
 - 2024 = health research
 - 2025 = solutions study
 - 2026 = voluntary temporary solution
 - 2027 = enforced temporary solution
 - 2030 = enforced permanent solution (first work phases)
- 5.11 However, it should be noted that some external factors, such as legal challenge, landowner actions or Government participation, are outside the control of the Council and may have impacts on the possible timeline.
- 5.12 Following the "Contaminated Land" decision and the issuing of any Notices, the broad pathways ahead could be one of:
- a) landowner voluntarily and promptly proceeds with a solution (either temporary or permanent)
 - b) landowner fails to comply with either Notice within the prescribed timescale, the Council pursues prosecution with a view to carrying out "works in default" for either a temporary or more permanent solution
 - c) landowner fails to comply with either Notice and goes into liquidation
- 5.13 With pathways A or B above, there would be a number of supporting actions required, such deciding on what type of solution to pursue, conducting any preliminary assessments, specifications and programming, confirming costings, pulling financial arrangements together, securing any required licences and permissions, procuring suitable contractors, managing and monitoring the works etc.
- 5.14 An overview of the key high level milestones delivered and planned are outlined in the table below.

- 5.15 Any detailed project planning would then take place once it is clear which project/pathway is being pursued.

DATE	ACTIVITY	LEAD	STATUS
2022-2023	Install all air quality monitoring nodes.	Public Health	COMPLETE
2023	Install all air pollution monitoring stations.	Public Health	COMPLETE
2023-2024	Research on health impacts.	Public Health	COMPLETE
2023-2025	Assessment of soil, air, asbestos and water.	Public Protection	COMPLETE
2023-2025	Research on air quality and air pollution.	Public Health	COMPLETE
2024-2025	Study of options to stop oxygen to fires.	Public Protection	COMPLETE
Sept 2025	Second Part 2A “Contaminated Land” decision.	Public Protection	ON TARGET
Oct 2025	Issue Abatement Notice (as appropriate following Pt2A decision).	Public Protection	ON TARGET
Dec 2025	Issue Remediation Notice (as appropriate following Pt2A decision).	Public Protection	AFTER DISCUSSIONS

Projected Spend

- 5.16 Although the site is privately owned, the Council has incurred costs – in particular since 2022 – associated with its Public Health and Public Protection (environmental health) statutory duties.
- 5.17 During the period from 2022 to March 2025, the Council incurred direct costs of £280K broken down as c£155K via Public Health (air quality monitoring, analysis and interpretation of impact on health of local residents) and c£120K via Public Protection (legal costs, soil/asbestos studies).
- 5.18 During 2025/26, initial direct costs of around £200K are expected – the majority being legal costs (Public Protection) associated with the first (2024) judicial review, the second Part 2A decision and statutory nuisance enforcement.
- 5.19 If a judicial review is lodged against the new (second) Part 2A decision in 2025 then this would result in further legal costs of up to around £100K and perhaps further in 2026/27.
- 5.20 If an appeal is lodged against a Remediation Notice or Abatement Notice then this would result in further legal costs of up to around £20K in 2025/26.

- 5.21 If there is agreement to support works for a temporary solution to stop the fires at the Site then that could lead to costs of around £50K in 2025/26 (assessment, design and procurement) and up to around £250K in 2026/27 (works).
- 5.22 There is also a commitment to the recurrent ongoing costs of air quality monitoring (PM_{2.5} and NO₂) around the site. From 2026/27 onwards, costs are anticipated of £12½K annually are anticipated (Public Health).
- 5.23 However, if (following a Notice) the landowner defaults on carrying out the necessary works to stop the fires (eg. capping the site to prevent combustion), then the Council may need (or decide) to step in to do the work. As any Notice is likely to allow one year for compliance before enforcement could begin, this would lead to costs anticipated to be incurred from 2026/27 onwards. Such works may require an initial spend of up to £50K to conduct detailed operational technical assessments and project planning, followed by either spend of around £450K for a temporary capping solution or spend of up to £5M-£10M for a permanent solution.
- 5.24 The Council may consider joining with other public authorities to pool funding to help facilitate the quickest (but temporary) means of stopping the fires. This could mean costs to the Council of between £125K and £250K depending on the extent of participation by other authorities.
- 5.25 In addition to the above direct costs, the Council has also incurred “opportunity costs” in relation to staff time spent working on matters pertaining to Arnold’s Field. See table below – including projections for future costs.

Staff Time – Opportunity Costs:

£K 2022/ 23 to 2024/25	£K 2025/ 26	£K 2026/ 27	£K 2027/ 28 to 2032/33	TOTAL £K
£669K	£281K	£239K	£566K	£1,755K

- 5.26 These are primarily “opportunity” costs where existing staff have been diverted from their other work to focus on Arnold’s Field – but do include some actual costs where temporary staff have had to be employed. This is estimated to be £950K to March 2026.

Summary of Potential Spend

- 5.27 In summary, over the period 2022/23 to 2032/33, the Council could incur the following non-staffing costs:

- a) Landowner voluntarily enacts temporary solution (without public sector financial support) – assuming subsequent planning permission granted for redevelopment
 - £870,000
 - b) Landowner voluntarily enacts temporary solution (with Council financial support) – assuming subsequent planning permission granted for redevelopment
 - £1,170,000
 - c) Council enforces (works in default) a temporary solution – assuming subsequent planning permission granted for redevelopment
 - £1,920,000
 - d) Council enforces (works in default) a permanent solution
 - £10,970,000
- 5.28 The above represents approximate projections for some scenarios and, given the large number of variables (such as future inflation, potential legal challenges or operational feasibilities), therefore only provides a guide as to possible costs.
- 5.29 It should also be noted that, even if a voluntary or temporary solution is achieved, if a full planning application is subsequently either not submitted or not successful, then a permanent solution may be required (assuming the undesirability of a series of temporary “fixes”) and that liability may fall to the Council as “works in default”.

Risks and Issues

- 5.30 Aside from health risks to the local population (covered elsewhere in this report), the risks to the Council are reputational, legal and financial.
- 5.31 The reputational risk continues to be significant. The matter of the fires/smoke from the Site (and the consequent impact on residents) has already been subject to significant media coverage – local, national and international and continues to be so. The longer the matter remains “unresolved” – or, at least, without a clear and publicly understood/supported course of action – the more reputational harm the Council suffers.
- 5.32 The legal risk includes that whichever contaminated land decision the Council makes and whether the service of either an Abatement Notice or Remediation Notice occurs, there is a significant likelihood of a legal challenge (whether by judicial review or appeal).
- 5.33 Whilst such challenge may be unavoidable in the current circumstances, the rigorous analysis of the issues, presentation of a robust rationale following careful consideration of all relevant factors in the context of suitable legal advice will minimise and mitigate the impact of such legal challenges. Nevertheless, defending such legal

challenges creates a very considerable financial and human resource burden on the Council.

- 5.34 The financial risk is substantial. Some of it has been in relation to the scientific study of the issues at the Site and obtaining legal advice pertaining to environmental health matters (Contaminated Land and statutory nuisance). Some of it may also prove difficult to avoid if, for example, the landowner refuses or fails to carry out the necessary remedial works and abandons the land, then further enforcement action may be impractical to pursue.
- 5.35 The Council may then be faced with the choice of either leaving the site in its current state (and facing greater legal/reputational challenge due to a continuing impact on residents) or executing the works in default at potentially very substantial cost (as outlined above).
- 5.36 There are also risks with any redevelopment of the Site. If the landowner's intended full planning application (should one be received in the future) is successful then that would potentially open a path for a permanent solution to stop the fires – delivered by the landowner – as part of the phased redevelopment works.
- 5.37 However, this would still take some years and the likely result in a significantly greater volume of HGV traffic during the works (potentially including contaminated waste transported by road through the borough – with associated risks) and potential pollution risks associated with “disturbing” the waste.
- 5.38 Nevertheless, the Green Belt status of the Site poses a strict policy constraint and the need to demonstrate the necessary very special circumstances case to justify the proposed development. It should be noted that the fires could be stopped without the physical redevelopment of the site concerned.
- 5.39 Finally, there is currently limited scientific evidence regarding the longer-term impacts of exposure to short-lived peaks of particulate matter pollution on the health of those exposed. Additionally, the relative recent recognition of the importance of parity of mental and physical health means that the current evidence base has gaps pertaining to the impact of recurrent pollution events on the mental health of the local population. There are therefore plausible risks relating to both the longer-term physical health impacts and mental health impacts on the local population which the Council has to consider.

REASONS AND OPTIONS

In line with its statutory roles, powers and duties, the Council embarked on a number of steps to examine and address the situation at the Site.

There are no specific decisions to be taken by Members at this stage as a result of this report, but the options considered (both since 2022 and at present) by officers include:

1) Do Nothing

This was considered and rejected as the volume of decomposing waste could lead to ongoing fires for decades, unchecked (and unending) suffering for residents, possible breach of statutory duties, extreme likelihood of legal challenge and major sustained criticism.

2) Proactive Research, Enforcement and Support

This was considered to be the best overall approach to ensure a clear understanding (through studies and expert advice) of the problem to be solved, a robust base for the decisions/actions to be taken (including clear routes for enforcement) and, in working with the landowner, to provide the quickest and most productive route to bringing the fires to an end.

IMPLICATIONS AND RISKS

Financial Implications and Risks

Potential costs faced by the Council are reflected in section 5 of this report. This is presented as a “worst case” scenario including if the Council is obliged (or decides) to conduct works “in default” if the landowner fails to comply with the relevant Notice.

These are outline/estimated figures as full operational/technical assessments would still need to be carried out first for programming any remedial/prevention works at the site.

It should be noted that the timespan into the future allows for two rounds of the temporary measure although the second round may not be required due to either the effectiveness of the first round or that the landowner receives planning permission and embarks on the appropriate redevelopment work.

It should also be noted that, even after the completion of any permanent or temporary works, air quality monitoring is likely to be required, albeit possibly reduced, to continue for some time to check/confirm the reduction in pollution.

Legal Implications and Risks

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

Human Resources Implications and Risks

Due to financial pressures, the Council's staffing complement has been significantly reduced in recent years and this has a notable current impact on the staff in the departments which have been dealing with the very substantive demands of responding to the issues relating to the site.

This impact is likely to continue for some time into the future and sustainability will have to be considered.

There are no other known HR implications and risks.

Equalities Implications and Risks

Reduced air quality due to environmental pollution is likely to have a greater impact on those with underlying health conditions (particularly respiratory). Such conditions are more likely to be prevalent in the elderly. Young children are also more susceptible to the effects of poor air quality owing to the stage of physical development and respiration rate.

Access to green and blue spaces has a positive effect on mental health and wellbeing. Those with poorer mental health/resilience would be more impacted by a restriction in access to public open spaces.

Residents not being able to use outdoor facilities (such as their gardens or public parks) during warmer weather (particularly school summer holidays) is likely to impact children more significantly (eg. play and development) and less affluent residents or those without private gardens who rely more on public outdoor spaces for recreation.

Health and Wellbeing Implications and Risks

Fires causing frequent but short-lived peaks of particulate air pollution are likely to increase the risk of exacerbations of existing cardiovascular and respiratory conditions (e.g. heart attack and stroke). Separately, continuing concern about the fires with no obvious remedy in sight will have a negative impact on the mental wellbeing of resident

Environmental and Climate Change Implications and Risks

Climate change and the resulting increases in extreme weather events (such as drought and heat waves) are likely to increase the number of fires occurring at the site.

Repeated fires at the site will increase air pollution of the environment, thereby contributing additional products of combustion (in particular carbon emissions) that contribute to the accumulation of greenhouse gases and subsequent global warming.

Whilst air and water testing has shown that such additional pollution may not have breached any relevant regulatory thresholds, the cumulative impact of such ongoing pollution will be negative.

The London Fire Brigade, in responding to multiple repeated fires at this single site, is likely to be using very substantial volumes of water – especially during periods of peak heat and peak likeliness of drought and water shortages. Run off water from such events is also likely to include several dissolved pollutant compounds that may enter the wider ecosystem.

END OF MAIN REPORT

BACKGROUND PAPERS & APPENDICES FOLLOW BELOW

BACKGROUND PAPERS

Documents referenced or considered in the production of this report:

Arnold's Field – Technical Note on Site Investigations

March 2012, Jacobs Engineering UK Ltd. (for Environment Agency)

Ground Investigation Report – Arnold's Field, Launders Lane

December 2023, GESL

Possible Health Impacts of Fires at Launders Lane: Havering Cancer Incidence

August 2024, Havering Council

Launders Lane Air Quality Monitoring Report (May 2023 – Sept 2024)

March 2025, TRL

The Effect of Arnold's Field Fires on the Respiratory Health of the Surrounding Population

April 2025, Havering Council

Review of Asbestos Monitoring at Arnold's Field, Launders Lane

April 2025, Havering Council

Launders Lane (Arnold's Field) – Capping Options Appraisal

June 2025, Havering Council

Breathe London Second Air Quality Report (Launders Lane Fires)

August 2025, Imperial College Environmental Research Group

All of the above documents are available via the Launders Lane webpage on the Council's website here:

[Response to fires at Arnolds Field, Launders Lane | London Borough of Havering](#)

APPENDIX 1

Brief History (Site and Actions)

- 1800s = agricultural fields
- 1960s = site used (legally) for the extraction of sand and gravel
- 1970s (approx.) = site used (legally) as a landfill for waste
- 1980s (approx.) = site restored to its previous (ground) levels
- 1998 = new landowner (not the current one)
- 1999 = planning permission was given for the site to be improved through importation of inert waste and soils to allow agriculture
- 2000 = further planning permission was granted that changed the approved profile of the land (raising it further) and sought use as community woodland rather than agriculture
- 2003/04 = Council identified that significant excess material had been deposited.
- 2004 = Council issued formal Enforcement and Stop notices
- 2005 = Planning Inspectorate upholds the Council's enforcement notices (ie. landowner loses appeal) and extends compliance period to Nov. 2006
- 2006 = landowning company dissolved itself
- 2008 = new landowner emerges
- 2005-09 = no clear evidence of additional waste being deposited
- 2010 = Council investigations suggests additional inert material had been brought onto the land during that year so began developing legal action (but overtaken by MPS and EA)
- 2011 = MPS raids site for drugs and firearms resulting in landowner being sentenced to six years in prison
- 2011/12 = EA/Jacobs/Costain site exploration/report
- 2011-14 = unregulated deposit of significant volumes of waste (EA conducts investigation)
- 2012-14 = EA proactive evidence gathering on waste dumping
- 2014 = site secured (main gate) and no further significant dumping
- 2017 = current landowner acquires site
- 2017-19 = Environment Agency conducts criminal prosecution
- 2019 = custodial sentences and fines issued on waste dumping gang (EA prosecution)
- 2019 = LFB data indicates "start of fires" (ie. more than just one per year)
- 2022 = Council installs first air quality monitors
- 2022 = Council commissions air pollution study (TRL)
- 2023 = Council commissions intrusive soil investigation
- 2024 = Council conducts study of cancer incidence
- 2024 = following assessment, the Council concludes that site does not meet EPA threshold of "contaminated land"
- 2024 = Council serves Abatement Notice (later withdrawn and timescales set for landowner)
- 2024 = Council serves Community Protection Warning on landowner
- 2024 = Council commissions asbestos study
- 2024 = a judicial review is lodged against the Council for the "contaminated land" decision
- 2024 = Council conducts review of NHS data on respiratory health
- 2024 = Council commissions options appraisal to stop fires (prevent oxygen getting underground)
- 2025 = Environment Agency confirms no abnormal pollution in watercourse
- 2025 = outcome from judicial review is issued
- 2025 = EPG options appraisal report is received
- 2025 = Breathe London (ERG/Imperial) final air quality report received

APPENDIX 2

List of Partners and Specialist Agencies

In addition to commissioning specialist studies from a number of consultants, the Council has consistently worked with key agencies and engaged with key stakeholders since 2022 in a concerted effort to identify and address the issues at Launders Lane (Arnold's Field).

This approach has included benefitting from expert opinion in the Technical Group as well as wider discussion/advice in the Partners' Meeting.

Those agencies and stakeholders have included:

- London Fire Brigade
- Environment Agency
- UK Health Security Agency
- Imperial College London (Environmental Research Group)
- Transport Research Laboratory (TRL)
- Greater London Authority
- Metropolitan Police Service
- Local Members of Parliament
- community representatives
- other local authorities

In addition, other specialist/scientific advice, input, services or support was commissioned or otherwise received on key subject areas from the following:

- Air Quality
 - Imperial College London Environmental Research Group
 - (as part of Breathe London project)
 - Transport Research (TRL)
 - University College London
 - UKHSA Radiation, Chemical & Environmental Hazards
 - UKHSA North London Health Protection Team
- Health Impacts
 - National Disease Registration Service (NHS England)
 - Imperial College London Environmental Research Group
 - UKHSA Radiation, Chemical & Environmental Hazards
 - UKHSA North London Health Protection Team
- Soil Assessment and Land Contamination
 - Geo-Environmental Services Ltd.
 - Land Quality Management
- Subterranean Fire Retardation
 - Environmental Protection Group
 - GRS Roadstone
 - Soil Treatment Services
- Asbestos
 - *(UKAS-accredited consultant has requested no disclosure but used certified sampling and analysis techniques)*
- Water
 - Environment Agency