



SUPPORTING STATEMENT

Proposal:

Variation of Conditions:

Condition 2 - Approved documents

Condition 4 - Stockpile height storage restriction

Condition 5 - Operational Hours

Condition 7 - Tonnage limit

Condition 8 - Importation and exportation of materials of planning permission P0925.17 to relocate the Roads Sweepings Facility to the Soils Recovery Centre.

Site:

Soil Recovery Centre, Rainham Landfill, Coldharbour Lane,
Rainham RM13 9YB

Submitted to:

London Borough of Havering

June 2024



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Drawings:

Process Flow Diagram (as approved under permission P0711.15)

Proposed Site Layout - VES_TD_SOILREP_300_011 (Rev A)

Elevations - VES_TD_SOILREP_300_012

Proposed Drainage Layout - VES_TD_SOILREP_300_016 (Rev A)

Existing Drainage Layout - VES_TD_SOILREP_300_017 (REV A)

Appendices

Flood Risk Assessment, dated 31st May 2017



1. INTRODUCTION

- 1.1. Veolia ES (UK) Ltd ('Veolia') is pleased to submit the current planning application for the variation of planning conditions 2, 4, 5, 7 and 8 attached to planning permission P0925.17, dated 22nd September 2017. The purpose of the current planning application is to seek planning approval to relocate and continue operating the existing Roads Sweeping ('RS') Facility within the Soils Recovery Centre ('SRC') area situated to the north eastern corner of Veolia's existing Rainham site.
- 1.2. There is an ongoing requirement for soil materials at Rainham for restoration purposes. These soils are essential materials to enable the progressive restoration of the adjacent landfill for beneficial after uses. For example, after filling in a particular area of the landfill to the approved levels, the relevant area is capped with an artificial liner and then covered with a protective layer of subsoil and topsoil, which also provides a growing medium for revegetating the restored areas.
- 1.3. This document is the current planning application's Supporting Statement, which should be read and assessed in conjunction with the rest of the planning application submission documents that include the proposed amended plans and the application form enclosed.

2. PLANNING CONTEXT

- 2.1. Extant planning permission P0711.15, granted on 18th December 2015 for the RS Facility requires operations to cease on 31st December 2024. However, the adjacent landfill site benefits from the materials recycled through the RS Facility because some of these materials contribute to the restoration materials of the landfill. Therefore Veolia wishes to retain the operation of the RS facility at Rainham for the landfill's benefit.
- 2.2. In addition the RS Facility provides a beneficial recycling facility for waste materials collected from road sweepings and the cleaning of the associated drainage infrastructure that consists primarily of soils and aggregates, which would otherwise be landfilled or disposed of elsewhere.



- 2.3. The current planning application therefore proposes to relocate the RS Facility to Veolia's existing SRC area also located at the Rainham site. The SRC's planning permission, reference P0925.17, expires on 31st December 2031.

3. APPLICATION SITE

- 3.1. The application site, also an existing area used for the recovery of different soils, is situated on the north east corner of the wider Rainham Landfill complex, also operated by Veolia. As approved under planning permission P0925.17 the SRC consists of a purpose-built impermeable slab constructed to approximately 16,000m² in site area (1.6 hectares). The slab is equipped with a 200mm upstand around its perimeter to contain surface water and prevent contaminated water draining off the slab. Veolia primarily envisaged that the SRC would treat soils excavated from previously developed land (brownfield sites) in London and the surrounding area. Whilst the SRC is used for treating these soils the demand for treating contaminated soils has reduced over time due to limited market demand. Therefore Veolia wishes to utilise the space available on the existing impermeable concrete slab located within the SRC area, to operate the RS facility, which processes soil materials using mechanical plant and machinery.
- 3.2. Veolia considers the application site as a very suitable location to relocate the RS Facility to until the end of 2031 as per condition 3 of planning permission P0925.17.

4. SURROUNDING AREA

- 4.1. The central area of the wider landfill complex is predominantly the most operational part (extant planning permission P1566.12). The application site is located to the north east corner of the periphery area of the landfill. Beyond the landfill area are Veolia's other waste management activities also approved under planning permission P1566.12. Further west is the Freightmaster Estate, currently being redeveloped for new industrial occupations and beyond these are the River Thames. The infrastructure of Easter Park and Beam Reach 8 Industrial Estate lay adjacent to the north western boundary of the application site.
- 4.2. Tilda Rice is the nearest industrial unit located in proximity to the application site. To the east runs Coldharbour Lane and beyond Veolia's SRC site are the Silt Lagoons used for



the storage of materials and plant, which is also subject to a planning application currently pending determination (application reference P1358.22) to partially redevelop the lagoons for the extraction, screening and crushing of waste materials. No residential properties are located within close proximity to the application site. The immediate surrounding area is predominantly commercial and industrial in nature with limited potential for the current planning application proposal to impact the surrounding environment and amenity of visitors. The area further north and west consists of the Inner Thames Marshes Site of Special Scientific Interest (SSSI) and the RSPB reserve which is locally important.

5. PROPOSED SITE CHANGES

5.1. *Relocation of the plant and machinery*

The proposal is for all plant / machinery and external storage bays associated with the RS Facility to be relocated to the application site. The processing plant and machinery consists of a hopper, trommel, conveyor belt, screens, overband magnet, cyclone separator, centrifuge, pumps, and tanks operated already under planning permission P0711.15.

5.2. *Water processing area & Drainage*

The RS Facility has a 'process wash' element which consists of a pre-wash, main washing unit and a post wash section (for some of the recovered outputs). Therefore the application site also requires a 'water processing area' which will be located on the north west corner of the existing concrete slab. This will provide treatment for the solids recovery, sanitisation and potential hydrocarbon removals before discharging the process water to the foul drainage. As shown on drawing 'VES_TD_SOILREP_300_016 (Rev A) - Proposed Drainage Plan', the drainage will not change significantly from its existing installation, which the SRC currently benefits from. The water treatment pipeline will continue to take treated water from the lagoon, connect into the leachate main on site and then eventually into the foul drainage sewer on the site boundary along Coldharbour lane, which it currently does. The only element that will change to accommodate the proposed relocation of the RS Facility is adding the water processing area however this will be positioned on the concrete slab.

5.3. *External bays*

The concrete slab will also accommodate the reclamation of the input and output bays required to store materials. Internal push-walls will be utilised to segregate and store the various output materials that will be stockpiled within their appropriate bays.



5.4. **Fire water storage tanks**

The proposal also includes the installation of no. 4 small fire water storage tanks with an associated hydrant pump to ensure the overall area has fire prevention mitigation measures available.

5.5. **Existing Soils Recovery Centre activity**

Although there has been less demand for the contaminated / hazardous soils to be treated over time, these soils still need to be accepted at the application site alongside the RS Facility as proposed in the application site. Once treated these materials will also continue to contribute to the restoration of the landfill.

6. **PROPOSED VARIATION OF CONDITIONS**

- 6.1. In order to accommodate the relocation and continued operation of the RS Facility, the planning conditions listed in this are proposed to be varied to make the proposal more accommodated at the SRC.

6.2. **Condition 2 - Approved documents**

Condition 2 of planning permission P0925.17 lists the current approved plans for the SRC. Therefore in order to accommodate the relocation of the RS facility the following drawings enclosed with the current planning application submission, are proposed to replace or remove the approved drawings:

- *Context Plan - VES_TD_SOILREP_200_048 (Rev C) - **Remain as existing***
- *Cross Sections - VES_TD_SOILREP_200_053 (Rev A) - **Remove***
- *Elevations - VES_TD_SOILREP_200_051 (Rev A)*
Replace with:
Elevations - VES_TD_SOILREP_300_012
- *General System Process (Rev C) - **Remain as existing***
- *Input Bay Sump Retaining Walls - 39897/015 (Rev A) - **Remain as existing***



- *Proposed Drainage - VES_TD_SOILREP_200_049 (Rev B)*
Replace with:
Proposed Drainage Layout - VES_TD_SOILREP_300_016 (Rev A)
- Existing Drainage Layout - VES_TD_SOILREP_300_017 (REV A) - **New**
- *Site Location Plan - VES_TD_SOILREP_100_045 (Rev D) - **Remain as existing***
- *Soil Repair Centre General Arrangement - VES_TD_SOILREP_200_046 (Rev C)*
Replace with:
Proposed Site Layout - VES_TD_SOILREP_300_011 (Rev A)
- Process Flow Diagram (as approved under permission P0711.15)

6.3. Condition 4 - Stockpile height storage restriction

Condition 4 of planning permission P0925.17 states the following:

'No materials shall be stored on the site above height of 3 metres without the prior consent in writing of the Local Planning Authority.'

Proposed variation of Condition 4:

No materials shall be stored on the site above height of 4 metres without the prior consent in writing of the Local Planning Authority.

Planning permission P0711.15 for the RS Facility currently allows the storage of materials associated with the facility to be stored at 4 metres high. Given that the proposed increase in stockpile height will be one additional metre higher in comparison to the restriction stated in condition 4 of planning permission P0925.17 the proposed change in storage height is not considered to be a significant change.

6.4. Condition 5 - Operational Hours

Condition 5 of planning permission P0925.17 states the following:

'The premises shall not be used for the purposes hereby permitted other than between the hours of 07.00 and 18.00 on Mondays to Fridays and 07.00 to 13.00 Saturdays, and not at all on Sundays, Bank or Public holidays without the prior consent in writing of the Local Planning Authority.'



Proposed removal of Condition 5:

Condition 5 is proposed to be omitted from planning permission P0925.17 to allow the flexibility of operational hours which the RS Facility currently benefits from under planning permission P0711.15, in which hours are not restricted.

6.5. Condition 7 - Tonnage limit

Condition 7 of planning permission P0925.17 states the following:

'No more than 46,000 tonnes of material shall be imported to the site per annum.'

Proposed variation of Condition 7:

No more than 49,950 tonnes of material shall be imported to the site per annum.

6.6. Condition 8 - Importation and exportation of materials

Condition 8 of planning permission P0925.17 states the following:

'All material imported and treated on-site shall be subsequently used in the restoration of the adjacent landfill. No material shall be exported from the site as a product.'

Proposed variation of Condition 8:

No material imported, processed and suitable to be used within the restoration of Rainham landfill shall be exported from the site for any other reason, unless otherwise agreed in writing by the local planning authority.

Condition 8 is proposed to be varied as suggested above to match condition 6 attached to planning permission P0711.15 for the RS Facility. This is to ensure materials that can't be used for restoration on the landfill can still continue to be exported off-site to other waste management facilities for further processing or to the markets.

7. Environmental considerations

- 7.1. The nearest sensitive receptors (residential properties) lie to the south on the opposite bank on the other side of the Thames in Erith. Therefore the potential for the proposed development and operation to generate an adverse impact on the amenity of these residents is considered to be minimal. However with any development, it is important to assess the level of impact on the nearest sensitive receptors surrounding the application site and propose mitigation measures if required.



7.2. Noise

Although there will be a level of noise generated from the plant/machinery associated with the RS Facility, this facility already exists and is operational which is currently not generating adverse noise levels. The surrounding environment is predominantly industrial and commercial in nature. The nearest sensitive receptors are located even further away from the application site's location in comparison to the existing RS Facility. Therefore noise is not considered to be an adverse impact generated by the proposal overall.

7.3. Vehicle movements

The RS Facility currently generates approximately around 10 deliveries per day or less, which it will continue at the application site as only Coldharbour Lane is used by vehicles to access and egress the site. Further, the material imported is replacing other material required for the restoration of the landfill so there is no overall increase in traffic to the wider site.

7.4. Ecology

The area surrounding the wider Rainham site in particular the Inner Thames Marshes Site of Special Scientific Interest (SSSI) and RSPB reserve are locally important with species. However the application site is an existing active site and the proposed relocation of the RS Facility will be situated on the SRC's existing concrete slab and not beyond it. This area of the application site is not considered suitable habitat for wildlife.

7.5. Visual Impact

The application site is located to the north of Veolia's landfill site, closer to the Tilda Rice site with Coldharbour Lane to the east and on the other side is the Rainham Silt Lagoons. The application site is situated at a lower level to the adjacent road and it is difficult to look into the site from the highway. Importantly the maximum height of the proposed plant/machinery to be relocated to the SRC site is approximately 6 metres high. Therefore the plant/machinery would not be intrusive or out of character against the backdrop of the landfill and the other waste related plant and buildings associated with the adjacent waste management operations.

7.6. Dust

The RS Facility requires the use of water in the form of spray bars and log washers to clean-up and separate the contaminants from the recoverable materials. Therefore the potential for dust is considered to be minimal given the dampening effect of the water used.



7.7. Flood risk

The site is located in an area that is classified as a defended Flood Zone 3, the primary source of flood risk being tidal flooding from the River Thames which lies about 250 metres from the application site at its closest point. As the area is defended by coastal defences, there is a low risk of flooding, although a residual risk remains in the event of a defense failure. Given that the proposal is only for the relocation of plant/machinery, open bays, a water processing area and fire water tanks, these key development components will be positioned on an existing active concrete pad. No further concrete or new buildings are proposed at the application site therefore the potential for flood risk as a result of this proposal is considered to be minimal.

The current planning application submission is accompanied by the Flood Risk Assessment report, dated May 2017 that was undertaken and approved for planning permission P0925.17, which is considered to be suitable for addressing flood issues for the current planning application. The assessment concluded in section 6 that following *'an assessment of flooding from all sources including tidal, fluvial, surface water and groundwater the site can be considered to be at low risk of flooding due to the presence of flood defences along the River Thames.'*

8. Policy Consideration

- 8.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004, section 70 of the Town and Country Planning Act 1990 and paragraph 2 of the National Planning Policy Framework (December 2023) requires applications for planning permissions be determined in accordance with the Development Plan, unless there are material planning considerations that indicate otherwise. Although the RS Facility is an existing and operational facility at Rainham, this Supporting Statement makes reference to the relevant planning policies that support the proposal.
- 8.2. The planning application proposal has been assessed within the context of the relevant local and national planning policies as follows:
 - Policies Map (South) 2021
 - Havering Local Plan (2016 – 2031) Adopted 2021
 - Havering's Site Specific Allocations Development Plan Document (2008)
 - The London Plan 2021
 - National Planning Policy Framework (NPPF) (as amended December 2023)



- National Planning Policy for Waste (NPPW) (October 2014)

8.3. The Policies Map (South) 2021

The Policies Map (South) 2021 shows the application site located within the Thames Policy Area which relates to 'Policy 31 Rivers and river corridors', which the proposal does not contravene with given that the proposal is for a temporary period of time.

8.4. Site Specific Allocations Development Plan Document 2008

The application site is located within the landfill complex which is allocated within the London Riverside Conservation Park that relates to Policy SSA17 of the council's Local Plan. After the landfill area is fully restored it will form part of the future Conservation Park, including the SRC area. The SRC has permission until the end of 2031 therefore the proposal will not impact the expiry time limit imposed by condition 3 of permission P0925.17.

The local planning policies listed below from the London Borough of Havering's adopted Local Plan are considered to be supportive of the proposal.

8.5. Havering Local Plan (2016 – 2031) Adopted 2021

- **Policy 27 'Landscaping'** - Although landscaping is not proposed in the current planning application, the existing landform and context of the site results in negligible impact on views into the site and amongst the surrounding environment.
- **Policy 29 'Green infrastructure'** - Whilst the application site forms part of the 'Rainham Wildspace' referenced in Policy 29, the proposal will not contravene with the aims of this policy given its temporary nature.
- **Policy 30 'Biodiversity and geodiversity'** - As stated already under '*Ecology*' in this document the application site is an existing and operational site primarily a concrete slab that would be unsuitable habitat for species.
- **Policy 32 'Flood Management'** - As stated already under '*Food Risk*' in this document, although the application site is located within a flood zone it is protected by coastal flood defenses and the proposal will not generate the potential for flooding due to the nature and use of the existing application site. A Flood Risk Assessment accompanies the planning application submission.



- **Policy 34 'Managing Pollution'** - As stated already under 'Environmental Considerations' in this document, the proposal will not give rise to adverse impacts or generate pollution.

8.6. The London Plan 2021

8.6.1. The planning application proposal is considered to be in compliance with the following London Plan policies:

- **Policy G1 - Green Infrastructure**
- **Policy SI 7 Reducing waste and supporting the circular economy**
- **Policy SI 8 - Waste capacity and net waste self-sufficiency**
- **Policy SI 9 Safeguarded waste sites**

8.7. National Planning Policy Framework (NPPF) (as amended December 2023)

- **Paragraph 8 of the NPPF** - outlines that the purpose of the planning system is to achieve sustainable development and that the economic, social and environmental objectives help to achieve and deliver this.
- **Paragraph 8 (a) of the NPPF** - states 'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.'
- **Paragraph 8 (b) of the NPPF** - states 'a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **Paragraph 8 (c) of NPPF** - states 'an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'



- **Paragraph 47 of NPPF** - states 'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.'

Although the NPPF does not specifically deal with waste management developments, the framework sets out the key goal of planning is in contributing towards sustainable development by achieving economic, social and environmental objectives. The proposal helps to achieve and deliver on all three of these objectives. Existing pollution, noise, dust and odour controls will continue to be applied at the site and this is considered to provide adequate mitigation to protect the environment and local communities. No significant adverse impacts have been identified and it is therefore considered that the development should be approved in accordance with the NPPF.

8.8. National Planning Policy for Waste 2014 (NPPW)

The NPPW is the latest Government policy on planning for waste management facilities and objectives for sustainable waste management. The NPPW sets out the key planning objectives, decision making principles and advice on determining planning applications.

The NPPF advises that in dealing with waste related matters the Government's NPPW is to be read in conjunction with the NPPF.

Bullet 3 of paragraph 7 of NPPW - Refers to locational criterias set out in Appendix B of the policy. These locational criterias have generally been addressed above in this Supporting Statement. Overall the proposal is for an existing facility to remain within a different area that is also existing and operational at Rainham to provide restoration materials. Therefore the proposal is not considered to be a development proposal that will generate adverse impacts on the local environment.