



Rainham Landfill

Extension to the Operational Lifespan of the Existing Landfill and Composting Facilities

Landfill and Circular Economy Statement

Prepared for



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1.0 INTRODUCTION AND BACKGROUND

1.1 Introduction

1.1.1 The London Borough of Havering retain a series of local validation checklists that explicitly identify information or documents that are required to be provided in support of applications for planning consent and/or authorisation. Checklist 004 is that which applies to applications for full planning permission and includes some documents that are mandatory in all cases, and some which may need to be provided dependent upon the type and nature of development proposed.

1.1.2 Landfill Statements are required for all development involving the depositing of waste (landfill) and is identified as being required in order to comply with the London Plan Policies SI7, SI8 and SI9.

1.2 Requirement of the London Plan 2021

1.2.1 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the period 2021 to 2046 and the Mayor's vision for Good Growth.

1.2.2 Importantly, it forms part of the statutory development plan for London which means that the policies in it should inform decisions on planning applications across the capital city.

1.2.3 Policies SI7, SI8 and SI9 all fall under Chapter 9 (Sustainable Infrastructure) of the Plan and represent the main policies of relevance to the determination of applications for waste management and processing facilities. Whilst the policies do not explicitly state as much, the identification within the Borough validation checklist for a Landfill Statement is in order to demonstrate how development proposals for new or increased landfill provision complies with the relevant objectives of the Plan.

1.3 The Role of this Document

1.3.1 This document represents the Landfill Statement in accordance with the Local Validation Checklist provided to demonstrate how the Proposed Development complies with the objectives of Local Plan Policies SI7, SI8 and SI9.



2.0 LANDFILL AND CIRCULAR ECONOMY STATEMENT

2.1 Policy SI7 Reducing Waste and Supporting the Circular Economy

- 2.1.1 Of relevance to decision making, Policy SI7 is split into two parts (A and B). Part A relates to all waste development. Part B requires referable applications to promote circular economy outcomes and aims to ensure that material arising from development projects is managed so that waste is reused and recycled sustainably. A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled leaving minimum residual waste.
- 2.1.2 The Proposed Development represents an 'end-of-life' facility for truly residual waste that cannot be subject to further reuse or recycling either because it is physically impossible to do so, or because to do so would represent greater economic or environmental harm. Consequently, the promotion of circular economy outcomes relevant to the Proposed Development are not applicable in this case.
- 2.1.3 The Waste Hierarchy gives priority to waste prevention, followed by re-use, recycling, recovery and finally disposal. Policy SI7 promotes a joint approach to the delivery of waste management solutions in accordance with the Waste Hierarchy by seeking to ensure that the mayor, waste planning authorities and industry work collaboratively. The fact that the Waste Hierarchy includes disposal as an integral part of it is because it is an important element of sustainable waste management for those wastes that cannot be managed further up the hierarchy. Just because it sits at the bottom, does not mean that it is not necessary or important. The Proposed Development represents an existing, permitted, well run, well located and efficient solution for the management of those wastes that are truly residual that cannot be recovered, recycled or re-used.
- 2.1.4 In 2015 32% of London's waste that was biodegradable, or recyclable was sent to landfill (London Plan paragraph 9.8.2). The Mayor is committed to sending zero biodegradable or recyclable waste to landfill by 2026 which is explicitly transposed into Part A(3) of Policy SI7. This critical objective is being delivered through a series of successful initiatives, most notably:



- i) The GLA Waste Reduction and Recycling Plans (RRPs) which set out key actions for cutting waste and boosting recycling. The RRP's are used to drive and promote local activity that plays an important role in cutting food waste and achieving 65% municipal recycling by 2030;
 - ii) Foodsave, which is supported by over 200 food organisations in London to prevent food waste and putting surplus food to good use;
 - iii) The Single Use Plastic Bottle Initiative, which in combination with the roll out of drinking fountains and free refill stations across the city has significantly reduced the volume of disposal bottles to landfill.
- 2.1.5 These local initiatives are working alongside national measures, most notably the landfill tax escalator which makes disposal to landfill increasingly unviable.
- 2.1.6 The Proposed Development would not hinder or conflict with these policies or programmes because the waste that is diverted to Rainham is that which remains following a series of reduction, reuse and recycling initiatives, be that at the point of manufacture, disposal, collection or following process through waste management facilities.
- 2.1.7 The supporting text to Policy SI7 states that:
- “When it is intended to send waste to landfill it will be important to show evidence that the receiving facility has the capacity to deal with waste over the lifetime of the development.”*
- 2.1.8 The Proposed Development represents an opportunity to appropriately utilise void space that exists as a result of the reduction in waste over time that has been sent to landfill because of initiatives to drive waste up the Waste Hierarchy. Consequently, the site has not been filled at the rate that was envisaged when planning permission was previously granted. The Proposed Development does not propose any change or variation to the way in which waste is disposed of at the site. By virtue of the operational facility that exists and has been operational for a prolonged period it is clear that the site has the capacity to deal with residual waste arisings for the revised duration of life now proposed.



2.2 Policy SI8 Waste Capacity and Net Waste Self-Sufficiency

- 2.2.1 Part A of Policy SI8 seeks to ensure that London's waste is managed sustainably. Criterion (1) requires that the equivalent of 100% of London's waste to be managed within London (i.e. net self-sufficiency) by 2026. In 2015 London managed 7.5mt of its own waste and exported 11.4mt, and imported 3.6mt of waste. The Plan acknowledges that waste contracts do not recognise administrative boundaries and waste flows across borders because they are drawn for a variety of historical reasons. Furthermore it is not always efficient or environmentally preferable for waste to stay within the borough in which it is generated. Sufficient sites therefore are required within London to deal with the equivalent of at least 100% of the waste apportioned to it.
- 2.2.2 Criterion (2) states that existing waste management sites should be safeguarded in accordance with Policy SI9 (see below). In 2015 London had a net self-sufficiency figure of only 60% and it is important therefore that sites such as Rainham which operate within London and can help London achieve its net-self-sufficiency objective, are maintained and their capacity fully utilised efficiently so that alternative new sites are not required to be identified, consented, engineered, developed, and ultimately made available to manage London's residual waste.
- 2.2.3 Criterion (3) works alongside Criterion (2) and states that; *"the waste management capacity of existing sites should be optimised."* The primary objective of the Proposed Development is to ensure that the existing capacity at Rainham is optimised in accordance with Criterion (3). This is because the existing capacity has not been fully utilised within the currently consented period due to the success of initiatives that have helped to reduce the quantity of residual waste generated, and increase the volume of waste that is recycled and composted. By utilising the existing remaining capacity at the Site, it ensures that additional residual waste capacity is not required to be brought on line (in accordance with the policy objectives); and guarantees that the Site is developed and restored in accordance with the previously approved landform and restoration scheme, thereby ensuring that the restored landscape is appropriate and that the long-term operation and management of the Site is effective (i.e. surface water, leachate, landfill gas management etc.). The



- Proposed Development thereby accords wholeheartedly with the objective of the Policy.
- 2.2.4 Criterion (4) relates specifically to new waste management sites and consequently is not relevant in this case.
- 2.2.5 Criterion (5) requires environmental, social, and economic benefits from waste management proposals. The benefits of the Proposed Development are set out throughout the application documents, but in summary the environmental and social impacts are shown to be acceptable and provide clear and demonstrable benefits when compared to the alternative of closing the Site in line with currently consented timescales. Failure to consent the extension of life would result in the need for the development of alternative site(s) for the management of residual waste disposal.
- 2.2.6 Part B and C relate to the delivery of Development Plans and encouragement of Mayoral Development Corporations to cooperate with host boroughs.
- 2.2.7 Part D provides a series of criteria against which development proposals for materials and waste management should be considered. Criterion (1) states that facilities would be encouraged where they deliver a range of complementary waste management facilities on a single site. The Rainham Facility represents a holistic integrated waste management facility that maximises the opportunity for recycling and composting of municipal, commercial and industrial waste, thereby ensuring that the waste that is disposed to landfill is truly residual.
- 2.2.8 Criteria (2), (3) and (4) are not relevant to the Proposed Development, dealing specifically with secondary repair and refurbishment, renewable energy generation, and delivery of combined heat and power facilities. Part E relates solely to new proposed development sites, and consequently is not relevant to the Proposed Development.
- 2.2.9 Part F states that planning for new waste sites or to increase capacity at existing sites should comply with a series of criteria. The Proposed Development is not a new facility and does not propose to increase the existing capacity at Rainham (rather it proposes to utilise the existing consented capacity). Consequently, it is not considered relevant to the Proposed Development.



2.3 Policy SI9 Safeguarded Waste Sites

- 2.3.1 Policy SI9 seeks to ensure that existing waste sites are appropriately safeguarded. As with regard to Policies SI7 and SI8, it lists a series of Parts which should be considered in the determination of planning applications. Of relevance to the Proposed Development, Part A states that existing waste sites should be safeguarded and retained in waste management use. The other parts of the policy are not considered relevant (relating to waste facilities located in areas identified for non-waste related development; requirements for waste plans; development that would result in the loss of existing sites; and development for relocation of existing sites).



3.0 CONCLUSIONS

3.1 Landfill Strategy

- 3.1.1 This document comprises a Landfill Strategy in respect of the Proposed Development for the extension of life of Rainham Landfill. The Landfill Strategy is required as a result of the London Borough of Havering local validation checklist. A Landfill Strategy should be provided for all development involving the depositing of waste (landfill) and should demonstrate how the development complies with the London Plan Policies SI7, SI8 and SI9.
- 3.1.2 This document demonstrates that the Proposed Development complies with all relevant parts of the Policies set out above, and consequently is consistent with the elements of the Development Plan that are most relevant to the application.
- 3.1.3 In accordance with the NPPF, the presumption in favour of development for decision making means that development proposals that accord with an up-to-date development plan should be approved without delay. To accord with a development plan, applications do not need to comply with every part of every policy of the plan, rather they should comply with the development plan taken as a whole. To determine whether the Proposed Development complies with the development plan taken as a whole an applicant should identify the policies of most relevance to the determination and come to a balanced view as to whether the development is consistent with them. The above document demonstrates that, in this case, the Proposed Development is consistent with the policies of most relevance, and consequently planning permission should be granted without delay.

