

SUMMARY

HAVERING EVIDENCE SUBMISSION “WASTE WILDFIRES” – ARNOLD’S FIELD

EFRA CMTE. – WILDFIRE RISK AND RESPONSE

Overview

The advance of climate change throughout Britain, together with the fluctuations in the duration and extremities of temperature and precipitation (with extended drought, extensive flooding, excruciating heat and sudden intensely cold events) has already been comprehensively explored and discussed.

Havering is the third largest borough by area in London with a high rural-urban index (50-60% of its area being “green space”) and is located in the north-east of the capital including borders with Essex County and the River Thames.

Havering has suffered from (and continues to be at risk of) the dual challenge of both flooding and wildfires (ie. both ends of the spectrum). The southern strip of the borough (including the broader Rainham district) includes not only river flood risk areas but also areas that have been subject to exceptional and major wildfires (Wennington and Arnold’s Field) eliciting international media coverage since 2022.

This “Wildfire Risk and Response” evidence submission to the EFRA Committee, from Havering Council, covers relevant issues pertaining to both the Wennington Wildfire (2022) and the Arnold’s Field Waste Wildfires (2018 to date) *[also sometimes referred to as the “Rainham Volcano” by the media]*. However, given the currently ongoing and unresolved nature of the waste wildfires there, the submission focusses more on Arnold’s Field.

Responding to and addressing the risks and realities of wildfires since 2022 has been a major and resource intensive undertaking for the Council under well known and very straitened financial circumstances. However, to date, the Council has received no funding or other support from Government to address these major exceptional wildfire occurrences.

Wennington Wildfire

Eighteen houses were totally destroyed in the wildfire of 19 July 2022 during that summer’s heatwave in the village of Wennington. The investigation by the London Fire Brigade was unable to pinpoint a specific cause for the fire that covered an overall area of 40 hectares and “100% damaged” 5 garages, 12 stables, a car repair workshop and numerous sheds/ out-buildings. However, the report noted that the fire appears to

have started around where a large field meets the back gardens of houses and was spread by the wind in “exceptionally hot and dry conditions”.

All residents experienced significant distress during the incident and in the immediate aftermath of the wildfire but it was those who were displaced from their homes for up to four years (and some permanently) who perhaps suffered the most.

The Council has diligently and closely supported the recovery and rebuilding process since the wildfire but the approach of every summer now heightens fears across the village of a repeat of the traumatic experience all the residents endured.

Arnold's Field Waste Wildfires

Arnold's Field is a privately owned site which was closed as a landfill in the 1970s but which, subsequently, became subject to the illegal dumping of approximately 50,000 tonnes of unregulated waste (rubble, household, commercial, hazardous etc.) piling up to several metres over a period from around 2002 to 2014.

Over time, this waste decomposed, degenerated and smouldered and then, from 2018, reached the point of triggering fires which burned combustible materials and vegetation at the surface, especially in warmer weather. These wildfires often spread over wide areas on the 17-hectare site and burned for days – with around 60 unique fires in any one year (concentrated in the summers). The smoke from these fires caused nuisance to residents (eg. having to stay indoors in school holidays) and harm to their health (eg. reports of coughing, breathing difficulties, streaming eyes etc. and a statistically significant increase in GP visits associated with “fire days”).

The Council formally declared the site as “contaminated land” in October 2025 but the landowner refused permission for the Council to carry out interim remediation in select zones of the site to stop/minimise the wildfires for the summer of 2026. Discussions are continuing, at the time of writing, with the landowner to pursue some level of voluntary remediation on the site. Otherwise, the only recourse of the service of a Remediation Notice would take some years to execute and be very costly to the public purse.

Summary Requests of Government

The following is the briefly summarised list, submitted to the EFRA Committee, of requests and suggestions (expounded on more fully in the main report below) for action by the Government to address wildfire issues both in Havering and nationally:

- 1) To recognise wildfires as “Acts of God” in relation to Government financial support schemes.
- 2) To establish a “Local Authorities Disaster Relief Fund”.
- 3) To review the Community Infrastructure Levy regulations and:
 - a. Create a “Disaster Exemption” rebuilding works due to a disaster.
 - b. Provide for a waiver where it would be reasonable for the property owner not to return to live in the rebuilt property.
 - c. Recognise that “re-build” is not a “new-build” following a disaster.
- 4) To provide financial support to Havering Council to cover costs related to the Wennington Wildfire.

- 5) To provide financial support to Havering Council to cover costs related to the Arnold's Field Waste Wildfires.
- 6) To designate Arnold's Field as a priority for clearance (perhaps under the Govt's current Waste Crime Action Plan) and provide the EA with funds for the necessary remediation action.
- 7) To consider whether legislation should be reviewed to ensure that regulatory remediation action taken under Pt2A of the 1990 EPA (eg. to address waste wildfires on contaminated land) does not prevent swifter pragmatic action to clear or remediate those contaminated land sites.
- 8) To amend the EPA 1990 to enable statutory nuisance action on contaminated land in certain circumstances.
- 9) To review the DEFRA Contaminated Land Statutory Guidance 2012 in light of the 2025 High Court ruling that smoke (from wildfires) be regarded as a "contaminant linkage" within Pt2A EPA 1990.
- 10) To more fully recognise the mental health impact that repeated wildfires (or fear of such repeats) have on affected communities.
- 11) To amend the DEFRA wildfire management/prevention funding regime so as to actively include:
 - a. waste wildfires
 - b. areas of higher rural-urban incidence
- 12) To consider facilitating the provision of additional temporary hydrants, where necessary, for Fire Brigade use close to waste wildfire sites which are prone to repeated large long-lasting wildfires.
- 13) To consider facilitating the provision of temporary networked CCTV, for local authority use, around waste wildfire sites which are prone to repeated large long-lasting wildfires.
- 14) To ensure that any national recording of wildfire incidents recognises the category of "waste wildfires".
- 15) To ensure that any national recording of the number of discrete wildfire incidents also recognises the total number of visits by the Fire Brigade to each fire (including for "controlled burns") required to ensure that the fire is out as well as proactive "visual audits".
- 16) To undertake targeted research in Havering to better understand wildfire impacts on local biodiversity and how effective current restoration approaches are in supporting ecosystem recovery.
- 17) To consider banning the sale of disposable BBQs (particularly during April to September).
- 18) To consider whether legislation should be introduced to give enforcement powers (and relevant resources) to councils and/or fire authorities to require private landowners to create and maintain firebreaks in areas at risk of wildfires.

An overview of the situation at Arnold's Field can be found on the Council's webpage: [Response to fires at Arnold's Field, Launders Lane - London Borough of Havering](#)

FULL REPORT

HAVERING EVIDENCE SUBMISSION “WASTE WILDFIRES” – ARNOLD’S FIELD

UK PARLIAMENT ENVIRONMENT, FOOD & RURAL AFFAIRS COMMITTEE WILDFIRE RISK AND RESPONSE

This submission, from Havering Council, is made in response to the 2026 Call For Evidence (issued by the Environment, Food and Rural Affairs Parliamentary Committee) on the subject of “Wildfire Risk and Response” as part of the EFRA Cmte’s wider Climate and Weather Resilience thematic inquiry.

[Call for Evidence - Committees - UK Parliament](#)

In the context of the overall growing wildfire risk being experienced across the UK, this submission primarily focuses on the apparently increasing risk of “waste wildfires” across the country (due to the escalating problem of large-scale illegal dumping).

[Wildfire Risk Assessment for Large Illegal Waste Site \(Kidlington\) - BBC News](#)

The submission uses the currently ongoing waste wildfires at Arnold’s Field in Havering as the main example case study but also makes reference to the other internationally known grass/property wildfire that took place in Wennington village.

The submission, throughout the body of the report, makes a number of points on the risks and responses in relation to wildfires to take account of the questions posed by EFRA in its Call for Evidence. However, as a supplement, the appendix at the end of the report also seeks to specifically address those particular questions.

London Borough of Havering

In any locality across Britain, extremes of heat and precipitation can cause significant problems and challenges (eg. health, transport, personal safety) for residents, workers and visitors. However, Havering faces two uncommon challenges in particular within its boundaries: the first is that the borough has amongst the highest degree of rural-urban interface in the capital (and, possibly, nationally); the second is that some areas of the borough are at risk from both ends of the climate impact spectrum (wildfires and floods) at different times of the year.

Within the borough, the two most notable wildfire “incidents” in recent years have been the Wennington Wildfire of July 2022 and the Arnold’s Field Waste Wildfires of 2018 to 2026 (ongoing at the time of writing).

And those two wildfires – both of which have seen national and international media coverage, one whose recovery programme has taken four years and the other which has been recurrent for eight years to date (lasting sporadically for months each year) and been the subject of High Court legal action (judicial review) – would, in no uncertain terms, be considered as “exceptional” given their specific circumstances.

Both Wennington and Arnold’s Field are in the Rainham area of the borough which exhibits high levels of rural-urban interface as well as notable levels of flood risk (in addition to the wildfires already mentioned).

It should be noted that, whilst the Environment Agency (“EA”) has identified 14 sites across the borough as licensed landfills, only 4 are considered to be actively operational, 7 are listed as live (but dormant) and 3 are officially closed. Council records also indicate that there are at least 48 historic landfill sites across the borough. All licensed landfills are subject to EA monitoring. The EA has stated that, other than Arnold’s Field (a historical “legacy” landfill prior to the establishment of the EA), it is not aware of any other substantive unlicensed/illegal waste/fly-tipping sites within the borough.

[Zane's Law Cabinet Report - Nov 2025 - Havering Council](#)

However, climate change is making the UK’s summers hotter and drier (while winters become warmer and wetter) with heatwaves becoming more frequent and intense and the record-breaking 40°C temperatures experienced in 2022 potentially occurring every 3-4 years by the year 2100. And, by the 2050s, average summers are projected to be up to 1.5°C warmer and 10% to 60% drier – perfect conditions for wildfires.

[Climate Change & Weather - London City Hall](#)

In addition, the overall volume of illegal fly-tipping has rocketed to record highs nationally with over 1.25 million incidents in 2024/25 (up 9% from the year before) together with around 100 incidents of large-scale illegal waste dumping dealt with by the Environment Agency.

[Guardian / DEFRA - Feb 2026](#)

The increasingly hot, dry climate combined with the increasingly widespread scourge of large-scale illegal waste dumping therefore presents a future “perfect storm” of conditions for an increasing number of waste wildfires and the accompanying negative and costly impact on residents, properties and local authorities.

Havering Council, like any other local authority, incorporates emergency planning/responses, public health and public protection (Environmental Health) into its business-as-usual functions. However, dealing with the ramifications of the two above exceptional situations (Wennington and Arnold’s Field) has unduly stretched the Council beyond its reasonable limits – both in terms of financial provision and staffing capacity. This is in a context where, despite over £40 million in savings since 2024, the Council faces a critical financial position with a projected budget gap of £66 to £77 million for 2026/27, requiring continued Exceptional Financial Support from the government and is an example of why some local authorities will need financial support to address the increasing challenges of wildfires.

[Havering Council Budget 2026/27](#)

Wennington Wildfire: July 2022

Background

Much has already been written, including nationally and internationally, about Wennington (a village located in Rainham, RM13 9DY) and so it will not be dwelt on in this submission but the wildfire took place during a summer that hit climate records in the UK where the maximum temperature reached a never before seen 40.3°C in the warmest year since 1884. With the extended tinder-dry conditions, flames spread across 40 hectares in Wennington and totally destroyed 18 houses (with another made uninhabitable for many months), vehicles, garages, stables, sheds, an electricity sub-station, a car repair workshop and other outbuildings – as well as resulting in 133 properties being evacuated and the HS1 railway (London to Channel Tunnel) being full-stopped for a period of time. It was not until almost four years later (March 2026) that the last of the 17 demolished houses was finally rebuilt and the displaced residents were able to move back into their homes.

The wildfire created significant disruption and distress for residents during the response phase (at the time of the fire and in the aftermath) and mental health support was provided and offered for a year after the incident. However, that disruption and distress was especially acute for those from the 18 houses who “lost everything” in the fire and were displaced (including outside of London) for four years until they were able to return.

Due to the impact on the community, the Council regarded Wennington as a priority for action and invested significant time and resource in the recovery of the village over the years following the fire. This included pulling together an innovative panel of insurers’ representatives (loss adjusters and surveyors) to coordinate the rebuilding process and resulted, inter alia, in the Council winning the Resilience category at the [2023 Alarm Risk Awards](#).

Lessons Learned

Key lessons learned during the response and recovery to this wildfire included:

- engage the voluntary sector to be involved in future emergency planning exercises
 - especially regarding the use of volunteers
 - the Havering voluntary sector was subsequently invited to the pan-London exercise in May 2023
- use resilience forums to engage at all levels
 - eg. voluntary sector forums and community safety partnerships
 - not just first category responders (such as police and fire)
- keep communications ongoing between incidents
 - as then much easier to engage and connect response interventions when need arises
 - have already sought to ensure full representation at our Counter Terrorism (CONTEST) Board
 - especially first category responders (such as police and fire)
- maintain a Summer Wildfire Prevention Action Plan
 - managing open land (inc. BBQs in heatwave conditions)

- encourage greater use of firebreaks (esp. near properties)
 - clearance of rubbish and deterrence of fly-tipping
- enhancing the Rest Centre training for staff
- consider expanding the capacity of Local Authority Liaison Officer (LALO) / Humanitarian Assistance Liaison Officer
- considering mutual aid from London at earliest opportunity
- besides expanding LALO capacity, draw up a rota of LALOs to ensure adequate rest (during a prolonged incident)
- acknowledging the importance of communications (particularly the website and social media) and how key it is to get “headline” messages out “immediately”
- encouraging/coordinating maximum levels of input but having clarity around roles to avoid “too many fingers in the pie” (even from the well-meaning)
- setting up a media room to ensure residents are not talked to unnecessarily
- keeping mass text messages informative but brief
- having multiple channels of communication (for individuals who did not provide mobile numbers)
- ensuring accurate detailed road closure details are publicised (for demolitions etc.) to minimise any public confusion
- continue practice of setting up individual invoicing for building control costs from the start to avoid later complexities – however, bills to be sent to property owners for forwarding to insurer
- since the Wennington Wildfire, extra cover has been put in place to deal with out of hours dangerous structures

Issues

However, a key hurdle that faced the Council in handling the Wennington Wildfire was the absence of financial support from the Government to deal with the response, aftermath and immediate stages of recovery. The Government’s Bellwin (emergency financial assistance for uninsurable expenditure) Scheme did not assist because the costs incurred by the Council (around £100K) did not reach the scheme’s threshold of 0.2% of the Council’s annual budget (ie. ~£400K) and because wildfires are not considered “Acts of God” by that scheme, even when caused by prolonged and exceptionally hot weather.

One matter of principle that caused concern amongst a number of the displaced residents (who were rebuilding their homes that were destroyed by the wildfire) was the Community Infrastructure Levy (“CIL”). The CIL regulations require that the default position is that the levy be charged and that eligible persons can apply for an exemption. Some of the homeowners felt that there should be an automatic “Disaster Exemption” so that those having to rebuild their homes should not also have the additional task of having to make an application for such an exemption.

There were also two other key criteria in the current CIL regulations which caused concern to residents. One criterion is that, to be eligible for an exemption from the financial charge, homeowners must commit to moving back into the property for a minimum of three years. However, after a number of years away from the property in alternative accommodation, some displaced residents (particularly those who were elderly or had other needs) had settled in a new community – perhaps with family

support – and felt that the regulations therefore punished them financially for not moving back in.

The other key criterion is that the CIL regulations do not recognise disasters such as wildfires and do not distinguish between a “new build” and a “re-build”. The regulations stipulate that where a building is demolished (for example, for reasons of safety due to being a dangerous structure – eg. following a fire) and then subsequently planning permission is granted to build a replacement building (as in the case for properties which were destroyed by the Wennington wildfire), then the replacement building is treated as a new build development that is consequently liable for the CIL charge. There is no recognition in the regulations that the property may simply be being rebuilt/replaced (as was) due to a disaster and, therefore, no facility for an exemption on those grounds.

Wennington: Conclusion and Requests

Wennington stands as an example of not only the depth of resilience in a community bouncing back from a disaster but also as an example of how councils can (and do), to high (award winning) standards, provide creative, coordinated and valuable response and recovery support to local people following a disaster.

However, it also stands as an example of where there may be gaps in how Government supplies the infrastructure and support to local authorities to, in turn, deliver that necessary support to local communities.

As a result of the evidence in this report/submission in relation to the Wennington Wildfire, Havering Council requests the following action from Government:

- In the context of climate change and increasingly hotter weather, for any Govt. financial support scheme (Bellwin) to recognise wildfires as “Acts of God”.
- The establishment of a “Local Authorities Disaster Relief Fund” to provide full reimbursement to councils to support communities in the response, aftermath and recovery following a disaster (such as a wildfire).
 - Consideration should also be given for this fund to provide support for the rebuilding of infrastructure.
- To review and amend the Community Infrastructure Levy regulations, in the context of a disaster (such as a wildfire), to:
 - Create an automatic “Disaster Exemption” from the levy where rebuilding works are required as a result of that disaster.
 - Provide a provision for the waiving of the levy in circumstances where, as a result of that disaster, it would be reasonable for the property owner not to return to live in the rebuilt property.
 - Recognise that the rebuilding of a property (in a like-for-like manner, acknowledging extant Building Regulations), as a result of that disaster, should qualify for an exemption from the levy.

For further information about the wildfire risk, response and recovery issues in relation to Wennington, see also:

[The London Climate Resilience Review – July 2024](#) (Greater London Authority)
[Wennington Fires Report - report.docx](#) (Havering Council, August 2023)

Arnold's Field Waste Wildfires: 2018-2026 (to date)

Purpose of Submission

In support of the key questions asked by the Committee, this submission seeks to highlight the potentially significant risk of wildfires caused by the increasing (and criminal) large-scale illegal dumping of waste which can, over time, degenerate, smoulder and self-combust, resulting in wildfires (particularly where vegetation has grown over the waste piles) which become more prevalent in warmer weather.

This submission also seeks to highlight not only the potential environmental damage and risks to property (especially in rural-urban settings) caused by such “waste wildfires” (which can be repetitive and long lasting) but also the significant negative impact that can be caused to local residents in relation to the enjoyment of their homes and to their health (both physical and mental).

In addition, this submission seeks to explore the support and resources that local authorities may need to address ongoing waste wildfires (which, as experience shows, can be severe and last over a number of years) and to halt/redress them through remediation.

Note that the UK National Fire Chiefs Council defines a wildfire as:

“an uncontrolled vegetation fire ... that requires suppression, often covering at least one hectare, featuring flames >1.5m, or needing 4+ fire service resources for over 6 hours... they are becoming more frequent due to climate change”

[Wildfire Aware - NFCC](#)

As the fires at Arnold's Field do also use the surface vegetation as fuel (which aids the spread in warmer, drier conditions), the fires due to the illegally dumped and degenerating waste at that location are included – in this submission – under the above definition of wildfires (hence the term “waste wildfires”). However, it should be noted that some of the fires at the site are smaller in area and shorter in duration than in the NFCC definition.

Arnold's Field Background

Arnold's Field on Launders Lane, Rainham, RM13 9FL is a 17-hectare former legal landfill (1960s/70s) that is privately owned. It is also located just 1 kilometre from Wennington Village (the location of the 2022 grass wildfire) and the Common Watercourse that forms its northern and western boundaries also later flows under Wennington Road.

Between circa 2002-2014, the site was subject to illegal activities, including significant fly-tipping, firearms storage and drug cultivation. The volume (approx. 50,000 tonnes) of illegal waste dumped, combined with the site not being properly managed in the manner of an authorised landfill together with the extent of vegetation grown over the surface, is the root cause of the present ongoing wildfires (since 2018) and smoke which became a hazard to the health of local residents.

Note that the current landowner did not acquire the site until 2017.

Nature of the Wildfires

A study conducted by the Environmental Protection Group (“EPG” – a geoenvironmental engineering consultancy) in 2024/25 indicated that, whilst the wildfires at Arnold’s Field were the burning, at ground level, of a mixture of vegetation and other dumped combustible materials (that happened to be at the surface) and that the fires often spread across wide areas in hotter weather, the fires themselves originated both at the surface and underground.

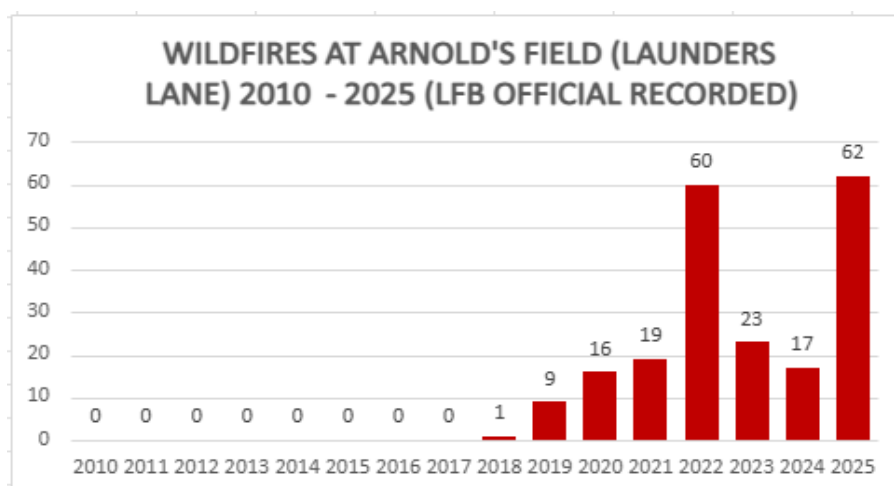
However, the ultimate conclusion of the study was that, on balance, the origin of the majority of the fires was subterranean. This was later reinforced when the number of fires and smoke incidents continued to occur at previous levels, and even increase, despite no new surface material or unauthorised persons entering the site (due to enhanced security) and the previously existing non-vegetative material at the surface having largely already been burned.

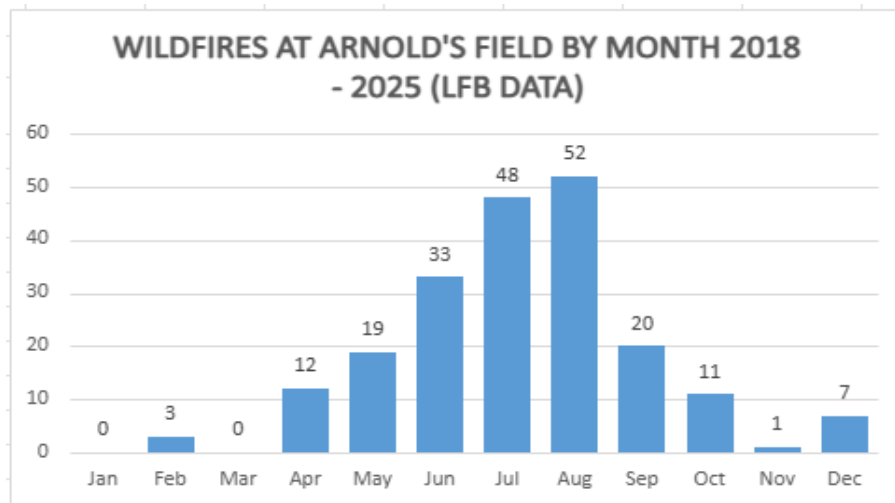
Thus, although only visible at the surface, these wildfires originated as subterranean smouldering hotspots caused by aerobic degradation of the waste (as it decomposed over time) fuelled by oxygen ingress underground due to the void spaces caused by the dumped materials not being compacted.

Fire Brigade Wildfire Data

Analysis of data from the London Fire Brigade (“LFB”) indicates that, whilst the mass dumping of waste at the site took place over a period of time spanning a decade and a half, the fires themselves only started (at least by LFB records) from late 2018 onwards and increased steeply thereafter.

Analysis of LFB data also indicates that, whilst wildfires have occurred at all times of the year, a pattern has emerged with the majority wildfires taking place and focussed in the warmer months of the year resulting in what has been termed as a “summer wildfire season”.





Of the 206 fires that occurred between 2018 and 2025, 133 (65% were in the summer months of June, July and August) and 172 (83%) in the five month period May to September. Looking at 2022 to 2025 alone, those figures would be 73% and 90% respectively.

At the time of writing (April 2026) LFB has given notice of only two wildfires at the site so far this calendar year. Both were on the same day in March. Although not necessarily the warmest individual day of the year or even the month, it was a day preceded by a number of warm days.

Fire Crew Costs

From 2018 to 2025, LFB formally recorded 206 fires at Arnold's Field. However, that figure does not reflect the number of times that LFB crews would have attended the site because each wildfire may require multiple visits for monitoring, dampening down or controlled burns etc. and does not include proactive "visual audits" to check the status of the site.

Note that, for health and safety reasons, fire crews are unable to go onto the site and so fire-fighting has to be done either from the road or from the limited hard standings just inside the entrance gates. This is because, as an illegal, unregulated and inappropriately managed site, the waste was not properly compacted and so potential void spaces underfoot present dangers to anyone walking there.

It is not clear what the notional cost of every LFB attendance at wildfire would be. That would depend on the nature of the fire, how many appliances needed to attend and for how long etc. with crews sometimes having to attend the site several times a day for several days consecutively for extended periods at a time.

It does not appear that LFB has published wildfire attendance costs but an FOI response in 2013 gave an LFB road traffic attendance figure of £260 per appliance. <https://www.london-fire.gov.uk/media/1431/foia14011.pdf>

Using that figure (and assuming an average of four appliances per recorded wildfire) would indicate a notional cost to date of £214K. However, using an assumption of an average of four visits per wildfire would then increase that estimate to £856K.

Alternatively, Humberside Fire & Rescue Service lists its call out charge as £446 per engine/crew for 2026/27. Applying that figure for LFB at Arnold's Field would indicate a notional cost of £367K for recorded fires or £1.45M for all visits to wildfires at this single site (a possible underestimate as London costs may be higher).

[Call Out Charges \(2026/27\) - Humberside Fire & Rescue Service](#)

Contaminated Land & Community Impact

Enforcement action had been taken at the site over the years by the Council, Police and Environment Agency in relation to dumped waste and other offences. However, in 2022 (and exacerbated by the huge jump in the annual number of LFB calls to wildfires at Arnold's Field that summer), it was clear that an entrenched issue had developed there in relation to fires.

The Council therefore embarked on a process to monitor and examine the air quality and the soil and to develop remediation options (both permanent and temporary) to stop the fires.

As part of that overall process, the Council looked at the impact the smoke was having on the lives of local residents. Reports indicated that the volume of smoke (often over a number of hours) prevented residents from enjoying their homes, for example with windows and doors having to be closed in the summer, children not allowed out to play, family barbecues being cancelled/abandoned etc. Residents also reported issues with breathing, coughing eyes streaming and offensive odours etc.

A study of medical data showed a statistically significant increase in GP visits on fire days by those with pre-existing long-term respiratory conditions. The evidence of harm due to the connection between the smoke coming from the fires on the site and adverse physical and mental health effects for local populations, led the Council to conclude that Arnold's Field should be determined as "contaminated land" within the meaning of Part 2A of the Environmental Protection Act 1990 ("EPA").

It should be noted that the formal determination of the site as "contaminated land" (due to the smoke from the waste wildfires) came following the [High Court ruling](#) (17 June 2025 – ref: AC-2024-LON-003340) due to the Judicial Review against the Council's previous 2024 decision that the site was not contaminated (within the meaning of Pt2A EPA 1990).

The 2025 judgement had established the new principle/precedent that smoke should be treated as a "contaminant linkage" for the purposes of local authorities considering whether land should be formally identified as contaminated under Pt2A EPA 1990. Up until that judgement, the Council (and others in the field) had not regarded smoke as a contaminant within the meaning of the EPA (as per interpretation of section 3.8 [source-pathway-receptor contaminant linkages] of the DEFRA Contaminated Land Statutory Guidance 2012) and so had made its 2024 decision in that context.

Remediation – Actions Taken

As well as being harmful and costly, waste wildfires present a number of challenges when seeking to resolve them.

One key issue is that the remediation of large scale sites of illegally dumped waste is notoriously complex and expensive – and is even more so where that site has also been formally designated as contaminated (under EPA Pt2A).

It should be noted that, whilst fires were not formally recorded at the site until 2018, the illegal waste (dumped since c2002) had begun to decompose and generate heat since at least 2012 (as noticed by an EA contractor where winter snow on the ground appeared to be repeatedly melted by sub-surface activity).

[Jacobs Technical Note - report for EA - 2012](#)

There have been some suggestions that, with decomposition having now been ongoing for at least a decade and a half, the decomposition/degenerative process at Arnold's Field may now have exhausted itself and that, with much of the non-vegetative surface materials having already been consumed, the fires have more or less burnt themselves out. However, there is not enough evidence to substantiate that position and, given the health risks, not a position that can be taken.

An options appraisal conducted by EPG in 2024/25 indicated that remediation through “traditional” capping across the whole site would cost at least £5M (with later estimates suggesting in excess of £10M). EPG recommended an approach called “cement polymer covering” (“CPC” – originally referred to as “hydro-mulching”) where, for an approximate cost of £300K, key select zones of the site could be covered with layers of soil, mulch and seeds with a final layer of a polymer to prevent the passage of oxygen to the underground voids and, thereby, prevent the smouldering, fires and smoke.

The landowner said that he did not have funds available to carry out any remediation.

Consequently, as a result of the formal declaration of the site as contaminated land in October 2025, the Council undertook to provide financial support for the CPC option (if the landowner voluntarily agreed).

Unfortunately, the landowner ultimately declined to agree to the CPC.

At the time of writing (May 2026), Havering Council is continuing to pursue the current landowner to voluntarily put some remediation – his “waste removal” proposal (which he asked to be primarily funded by the Council) – in place in key “hotspot zones” within the site to stop (or significantly reduce) the fires there prior to the annually expected 2026 “summer fire season” (in order to minimise negative health impact on residents).

Enforcement and Remediation – Regulatory/Legal Issues

Current legislation and regulations do not facilitate swiftly effective enforcement action by local authorities against those that have a responsibility for the sites where waste wildfires have occurred (or are repeatedly occurring).

Statutory Nuisance

The protocols/legislation around statutory nuisance were not written to cater for situations such as Arnold's Field.

Havering Council is, as far as we are aware, the first local authority in Britain to declare smoke (from waste wildfires on the contaminated land in Arnold's Field) as a contaminant linkage (within the meaning of Part 2A of the EPA 1990).

In accordance with DEFRA's Statutory Guidance (2012) on contaminated land, a period of time is required to enter into discussions/negotiations with the landowner to explore voluntary arrangements to remediate the site. This period is a requirement prior to considering the serving of any formal Remediation Notice. However, this period of time can extend to being many months or even years.

Subsequent to a declaration of contaminated land, the serving of a Statutory Nuisance Abatement Notice, under the provisions of Section 80 of the EPA, would be the most straightforward and pragmatic route to swiftly put measures for enforcement in place – especially where that nuisance (in this case smoke) is prejudicial to human health – not least to encourage speedy progress on the discussions/negotiations.

However, the EPA (as it currently stands) prevents Statutory Nuisance measures being deployed on land that is affected by contamination.

A Community Protection Notice (under the ASB, Crime and Policing Act 2014) could also be considered in cases of contaminated land where the situation, as at Arnold's Field, is persistent, continuing and causing a detriment to the locality. However, the powers to enforce a remedy are untested at this time in these particular circumstances.

Land Remediation

Remediation can be defined as “the process of correcting, improving, or fixing a bad situation, defective condition or contamination (often focusing on environmental clean-up)” and can be applied as “the removal of hazardous substances from soil, groundwater or sediment to protect human health and the environment”.

In addition, in the context of “contaminated land” under Part 2A of the Environmental Protection Act 1990, remediation can simply be regarded as breaking the Source, Pathway, receptor pollution linkage. In this case, they would be the smouldering waste, smoke and local residents respectively.

Rather than full scale remediation across the site (eg. to support commercial redevelopment), the Council's priority at this stage has been to seek the level of remediation necessary to prevent further harm to the health of residents caused by

the smoke at Arnold's Field. The initial aim was to complete this before the start of June 2026. In effect, that means the breaking of the Source-Pathway-Receptor pollutant (ie. the smoke) linkage mentioned above by eliminating or preventing any element of the chain.

Both the Council's proposed cement polymer covering (CPC) method (removing the Pathway by stopping the oxygen fuelling the fires/smoke) and the landowner's more expensive proposed waste removal method (removing the Source by taking combustible waste away) could have therefore broken the above pollutant linkage and prevented further harm to health.

Ultimately, the landowner prevented pursuance of CPC and, to date, has declined to provide sufficient detail for full support, from the public purse, for his waste removal proposal.

Although, at the time of writing, discussions and negotiations are continuing with the landowner, it is beginning to appear that these may not be successful and so the quickest means of achieving the level of remediation of the site to ameliorate the harm to health of residents would be through the service and enforcement of a Remediation Notice.

However, that timeline could mean residents having to suffer the harms to their health for several more years. With the contaminated land declaration having been made in October 2025, the serving of a Remediation Notice (following the required period of discussions) could well not be until October 2026 (ie. a year later).

Statutory Guidance requires that the pursuance of remediation under the notice be initially focused on those categorised as the "Class A" liability group. In the case of Arnold's Field, this would include the previous landowner (at the time of the illegal dumping of the waste that has caused the wildfires) but primarily – applying the "polluter pays" model – those who actually tipped the waste onto the site.

Pursuing the polluters and previous landowner is a process, to secure their undertakings of (or provided financial contributions to) the necessary remediation, that could take a further year or two.

If there is no success with the Class A liability group, attention would then turn to the Class B group which, in essence, would be the current landowner. Legal advice is that the current landowner would then need to be given up to a year to comply with the minimum level of remediation needed or perhaps up to two years to comply with achieving full remediation of the site.

If the current landowner (Class B) did not comply then the Council could go back to court to get an order for enforcement which, with possible appeals etc., could be another year. Finally, if still no resolution, an application could be made to the court for the Council itself to carry out the works in default on this privately owned contaminated land site. This may well be a further year until completion.

Consequently, overall, leaving aside the impact of the smoke from the waste wildfires from 2018 to 2025, local residents may have to be subject to the risk of further negative harm to their health for an additional seven years (to the year 2032).

DEFRA Waste Crime Action Plan

Covering an overall area of approximately 17 hectares and with an estimated 50,000 tonnes of dumped waste, Arnold's Field is amongst the largest (if not the largest) illegal waste dump sites in Britain. This would make the site larger than the "three of the worst illegal rubbish dumps in England" put together (totalling 48,000 tonnes) that the Government plans to clear under DEFRA's 2026 "Waste Crime Action Plan".

[Illegal waste dumps to be cleared by Govt - BBC - March 2026](#)

It is understood that DEFRA did not consider Arnold's Field as a site that should be funded and cleared under its action plan because the site had already, in 2025, been designated as "contaminated land" and so, in DEFRA's view, should only be addressed under the contaminated land remediation enforcement/regulatory regime – which could take years (as outlined above).

However, where swifter pragmatic processes are available, they should then be considered.

DEFRA's own Contaminated Land Statutory Guidance (2012) sets out that voluntary arrangements should be pursued first before proceeding down the enforcement route (ie. serving a Remediation Notice). Consequently, DEFRA (with support from the Council) could explore Waste Crime Action Plan clearance at Arnold's Field as a voluntary arrangement with the identified polluters and landowners.

Any public expenditure on this Waste Crime Action Plan clearance could be considered for repayment (in full or in part) by the polluters/landowners where they may receive commercial benefit as a result of the remediation/clearance of the site.

Prevention and Control

It is often said that prevention (and/or early intervention) can often be better, or at least cheaper, than the subsequent cure.

This would clearly apply in the case of large scale, repeated waste wildfires.

However, whilst it might be possible to improve the security of remote open spaces, it is not always possible to prevent large scale dumping in advance. The key is then likely to be prompt clearance and deterrence through early and effective enforcement.

Local Authority Costs

From April 2022 to March 2026, the Council has incurred around £1.4M (£450K in direct costs plus a further £950K in staff time opportunity costs) on dealing with the issues of the waste wildfires at Arnold's Field.

Government Support

Havering Borough Council has engaged in discussions with the Environment Agency, London Fire Brigade and Greater London Authority amongst others. However, to tackle this blight on the local environment and its ongoing harmful impact on the health of residents, the Council primarily needs support (both financial and legislative) from the Government – particularly from DEFRA and MHCLG.

Financial

The Council's current overall budgetary position is that it formally requires further Exceptional Financial Support to close its budget gap. Consequently, any additional spend incurred/needed to protect the health and wellbeing of residents due to the waste wildfire blight from the privately owned contaminated land site at Arnold's Field is an extremely onerous burden.

[Full Council agrees budget for Havering | London Borough of Havering](#)

In addition to the approximate £1.4M costs to date, a further estimated £1.1M costs (£250K direct costs plus a further £850K in staff time opportunity costs) are envisaged (excluding actual remediation) – thereby leading to a sub-total of £2.5M.

[Cabinet Report - Arnold's Field Overview - Sept. 2025 - Havering Council](#)

In January 2026, in anticipation of supporting the urgent deployment of limited remediation to the site (key zones) to stop (or significantly reduce) the waste wildfires and smoke prior the summer wildfire season, a provisional sum of £300K was set aside, from the Council's limited reserves, for this purpose. Thereby a running sub-total of around £2.8M.

However, further remediation (beyond the key zones mentioned above) may be required to other zones (or, indeed, the entire site) to fully stop all the wildfires and control the contamination. This has been roughly estimated (by the Environment Agency) to cost in excess of £10M.

Legislative

The current wording of the 1990 Environmental Protection Act prevents, as outlined above, the use of Statutory Nuisance provisions when land has been formally identified as contaminated under Part 2A.

Arnolds Field: Conclusion and Requests

Changes in public behaviour (and, perhaps, socio-economic conditions) across Britain have resulted in an increase in large scale illegal dumping of waste over the past three decades. Combined with the worsening impact of climate change over the same period, this has resulted in the phenomenon of a growing number of waste wildfires for which local authorities have not been fully equipped to deal with.

The unique nature and consequences (health and otherwise) of waste wildfires were also not fully envisaged when legislation was drafted meaning that measures to swiftly and effectively address them are not always at hand.

Arnold's Field is an example of such a waste wildfire which has presented a damaging and costly challenge over a number of years to date and which may endure for some years into the future.

Without action now, there may be more Arnold's Fields ahead.

As a result of the evidence in this report/submission, Havering Council requests the following financial support from Government:

- Funds to cover direct and indirect costs to date and projected to 2032/33 (as outlined above)
- DEFRA to designate Arnold's Field as a priority and provide the funds for the Environment Agency to take the necessary action to remediate the site

As a result of the evidence in this report/submission, Havering Council requests the following legislative changes from Government:

- Amendments to the Environmental Protection Act 1990 to provide for statutory nuisance action on contaminated land where the nuisance arises from smoke, noise etc.

Government should also take note of the implications of the October 2025 High Court ruling that smoke from waste wildfires should be considered as a contaminant linkage in relation to formal determinations on contaminated land under Part 2A of the Environmental Protection Act 1990 and so may wish to review the 2012 Statutory Guidance on Contaminated Land accordingly.

Other requests covered within the body of the report are included in the overall list of requests in the "Summary Requests of Government" at pages 2 and 3 of this document.

An overview of the situation at Arnold's Field can be found on the Council's webpage: [Response to fires at Arnold's Field, Launders Lane - London Borough of Havering](#)

APPENDIX

BRIEF ADDITIONAL RESPONSES TO THE FORMAL QUESTIONS POSED BY THE EFRA COMMITTEE

In addition to the relevant evidence provided earlier in this submission, please see below further comments on the specific questions posed by the Committee in its call for evidence.

Q1. How can land management techniques be best used at a regional level to prevent and control wildfires whilst balancing the needs of different land users? What evidence-gaps are there and how can they be filled?

For any type of fire to ignite and persist, all three elements of the “triangle of combustion” are required: heat, fuel and oxygen.

To prevent waste wildfires, the key lies in the proper management of the waste by denying oxygen through compaction and capping (or through total removal to a suitably managed site).

Where prevention is not possible then control could be pursued through denial of sufficient oxygen by covering the surface with a suitable environmentally-friendly substance that still permits the growth of vegetation (such as the cement polymer covering previously proposed at Arnold’s Field) – further extensive development and trials of such substances would be required.

For all types of wildfires, evidence indicates that fires are more likely to erupt after sustained durations of heat and dryness. Using water as a coolant through a framework of irrigation pipes in select situations might be a consideration but is unlikely to be affordable at scale and there may be concerns about contamination of the run-off (in dumped waste scenarios). Caution should also be taken not to replicate the conditions of high moisture hay where bacteria can cause bio-chemical reactions that lead to spontaneous combustion.

There is limited information on how wildfires have affected local ecosystems and habitats in Havering, or on the longer-term impacts on biodiversity. More research is needed to understand how wildfires can be prevented, what ecological damage they cause, the natural and human factors that influence how they are managed and how effective current approaches are at restoring affected ecosystems.

Q2. What role do nature-based solutions, such as improving biodiversity and more resilient landscapes, have in the prevention and control of wildfires?

As per Q1 above, the ideal solution to waste wildfires would be full remediation of the site in question (compaction/capping etc.). However, in turning such a site into community woodland etc., – and in any solution to address areas prone to grass wildfires – strategies should include fire-resistant landscaping strategies creating effective fire breaks and zones, strategic tree placement and maintenance, soil and irrigation management and annual fire-preparedness assessments. Care should be taken in relation to the choice of vegetation, noting that some plant species are less flammable or slow-burning than others, so together can slow or even halt the spread of fire. And vice versa, for example,

eucalyptus trees – although resistant to fire themselves – are prone to spread wildfires due to the nature of their bark and oils. Consideration should be given to native trees that are less flammable, and also the diversity of species and age to further reduce fire risk. [Fire-Resistant Trees for Wildfire Protection | Arborist Now](#)

At Wennington, the primary route through which the fire spread and destroyed so many houses was via the overgrown privately owned field at the back of the houses in the village. The Council put in place an annual Summer Wildfire Prevention Action Plan and worked together with the Fire Brigade and the commercial owner to establish a yearly cycle of creating a firebreak (cutting the vegetation short – as a cost-effective alternative to laying a wide concrete strip) along the border between that field and the backs of the houses. As a further alternative in other situations, consideration could be given to the planting of a hardy but slow-growth and low-height grass which might reduce the need for annual maintenance.

However, it should be noted that neither councils nor fire authorities have specific powers to require landowners to create and maintain firebreaks in areas which may be at risk of wildfires and, whilst public appeals are issued to encourage landowners to take the necessary action, this course meets with limited success. Although the Council has issued one Community Protection Notice (CPN) on one site, it was based on the likelihood of 'nuisance' from smoke etc. But when the issue may be more wide-reaching (such as public safety) a CPN is not appropriate so other specific enforcement powers would be needed. As well as already having certain powers, the expertise around wildfires and the data associated with the resource demand that such fires place on fire crews (and so would directly benefit from prevention of such fires), the local fire authority might therefore probably be the best place for specific firebreak enforcement powers to be located. These powers would necessitate an appropriate level of financial resourcing – including the initial work of mapping and collating information on what land parcels currently exist, researching the ownership details (which are not always readily available) and establishing communication with said landowners (who may be located abroad). Many of the preceding activities may have to be repeated, at least in part, yearly in addition to regular monthly site inspections during the overall wildfire and vegetation growth season (covering March to November). Resources would also be required if, as a last resort, the fire authority had to carry out the identified works "in default" (ie. where the landowner failed to carry out the required firebreak works).

Q3. How best can Defra funding schemes be used to support land managers to adapt to the increased risk of wildfires?

DEFRA's current wildfire funding regime appears to be fundamentally focussed on addressing the risks of grass wildfires in farmland, woodland forests and other countryside areas. These categorisations would tend to exclude areas, such as Havering, which have a higher rural-urban incidence and the categorisations also tend to exclude waste wildfires (especially with repeated risks).

Q4. What impact does the monitoring of wildfires have on our understanding of the causes and risks of these events in the UK, and how can this be improved? Are there international examples or best practices that can be used in a UK context?

It is unclear whether the central national coordination of the monitoring of wildfires (presumably through Fire Brigade reports) appropriately recognises the specific category of wildfires due to dumped waste and appropriately distinguishes between the discrete number of wildfires and the overall number of visits (and consequent amount of time) required by fire crews to properly deal with each fire.

The associated amount of time/costs also expended by other public bodies (including local authorities) on addressing wildfires should also be centrally collated to give the full quantifiable picture to support the case for more effective investment in preventing and controlling such wildfires.

Although literature exists to educate the public on wildfire risks, there is limited information provided on the human causes, economic and biodiversity recovery and health concerns. The chapter [Wildfire Education: A Review Across the Globe](#) in the book "Fire Hazards: Socio-economic and Regional Issues" provides examples of worldwide educational materials on wildfires – for example, [Smokey Bear](#) (which includes home safety tips).

Q5. What resources and training do emergency services and local authorities need to respond to the increasing number of wildfires, particularly in rural and hard-to-reach areas?

The absence of overall financial support to local authorities to deal with the increasing volume of wildfires continues to be a serious issue.

As a result of the 2022 experience (in Wennington and elsewhere) the local Fire Brigade now has specialist tactical advisers trained in tackling wildfires as well as specialist equipment – "holey" hosepipes (which create a "wall of water") and specially equipped off-road wildfire response vehicles.

At Arnold's Field, both fire-fighters and police officers (eg. at cordons around the site during fires) have raised questions around personal safety and personal protective equipment in relation to their repeated and extended presence close to fires at the illegal and unregulated waste site known to contain contamination and hazardous substances.

It should be noted that, for health and safety reasons (due to the unsecure and non-compacted nature of the ground), fire crews do not go onto the site but primarily fight the wildfires from the roads along two of the boundaries (east and south) – usually from high up on the extended ladders. The west and north boundaries are less accessible farm and rough terrain land under other private landowners.

A key challenge at the site is that there is not a water hydrant close by. If the wildfire is only of a modest size then the water from the fire engines themselves will be sufficient. However, for larger or longer lasting fires, either multiple engines from different fire stations need to be called in (tying up vital resources taken from elsewhere) or major six-inch pipes running along and across the road thereby causing traffic and road blocks. It was considered too costly to pay for the water supply company to install a hydrant close to the site.

A useful resource for local authorities for recurrent long-standing wildfires would be the provision of (temporary) CCTV to monitor and detect fires (video recording, smoke and thermal imaging) linked to a central control room and initiating automatic email alerts for response by, for example, Environmental Health Officers to formally witness nuisance. The Council does currently utilise a system of email smoke alerts from air monitors close to where residents live but these cannot confirm that the source of the smoke/fire is Arnold's Field (as opposed to some other location).

Q6. What are the most effective activities for tackling the human causes of wildfire ignition, for example public engagement and campaigns? How can the UK Government best support the delivery of these activities at both a local and national scale?

In the context of waste wildfires, once a large-scale site of illegally dumped waste has been identified, the best remedy to prevent wildfires would be early action to halt any further waste going onto the site (eg. by securing the location) and to either clear or cap the site as quickly as possible (before decomposition, degeneration and smouldering sets in).

However, the ideal would be to stop the illegal dumping in the first place or to intervene before it moves from small/medium scale to large-scale. As with all types of crime, the underlying drivers should be explored – including:

- costs of lawful disposal
- access to lawful disposal sites
- ensuring the minimisation of domestic waste for landfill
 - ie. maximising what is routed for recycling
 - the “Simpler Recycling” measures are a step forward
- encouraging/requiring large building sites to conduct a greater proportion of separation/segregation of waste at the works site prior to relevant disposal
- encouraging/requiring small building works (including renovations etc. at domestic premises) to conduct a separation/segregation of waste at the works premises prior to relevant disposal
- for reducing the risk of all wildfires, the UK Government could consider banning the sale of disposable BBQs

Q7. What policies are in place, or are needed, to reduce the severity of wildfires and their socio-economic impacts on both agricultural land and at rural-urban boundaries?

A notable feature common to both the Wennington and Arnold's Field wildfires has been the mental health impact on communities. Not just in relation to the immediate impact of a single wildfire incident but the long-term impacts and the fear of a repeat in similarly recurring circumstances. The additional element in Arnold's Field is that the cause of that fear actually materialised time and time again as the fires really repeated over and over (206 times over the past seven years). This stress in the community was acknowledged in the local contaminated land decision in October 2025 but perhaps should be more fully recognised in policy at national level.

Q8. Given that responsibility is spread across government departments and bodies (e.g. Defra, Forestry Commission, MHCLG), how should the government coordinate a cross-departmental approach to tackle the increasing risk of wildfires?

As wildfires in Britain have largely been associated with extensively rural areas (farming, woodland, countryside) any review of coordination of responsibility should actively acknowledge the existence of wildfires in areas with an urban presence.

Any review should also acknowledge the increasing prevalence of waste wildfires as a specific challenge in its own right.