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Mrs Sharon Hodgson MP
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Vermont House
Concord
Washington
Tyne and Wear
NE37 2SQ

7 November 2017

Our Ref- RKL002/ARN/PK

Dear Mrs Sharon Hodgson MP

Thank you for sending a copy of your objection to Rolton Kilbride. I appreciate you have concerns and it would have been good to discuss these, particularly before they were made public. We could have given you independent, peer reviewed evidence to tackle specific issues, preventing further misinformation which is feeding more public concern. However, in lieu of that, I have endeavoured to address these and correct some of the misunderstandings that the community has brought to your attention.

Through our public consultations, engagement and feedback we are very much aware of the concerns shared by you, councillors and local residents regarding existing litter and waste problems associated with other waste-processing sites. You will appreciate we are unable to comment on other operators' conduct, although we are aware that some waste businesses do not adhere to the standards that should not only be expected, but enforced. Should the development proceed, Rolton Kilbride will set up and run a Community Liaison Group that will monitor feedback from residents on any concerns, including traffic, noise, odour, health etc, to ensure proper and accountable conduct.

Waste management: In our proposals, waste will be delivered to the renewable energy centre via covered waste HGVs and at no point will waste be stored outside. The roller doors to the reception hall will remain closed unless receiving a delivery, in which case the doors will be open for the minimum time required. This prevents odour escape and as we discussed, works well at other modern facilities. We have a duty of care, which we take most seriously, ensuring that the waste bring treated by our facility, from delivery to despatch, is treated properly and our obligations to the environment and community are fulfilled.

Traffic: The traffic impact assessment (TIA), is part of the overall Environmental Impact Assessment (EIA) and shows that once the facility is operational, there will be 110 HGV movements a day – or 55 journeys into the facility and 55 from site, including 9 deliveries and collections of processing materials and residues per day. This equates to one extra vehicle on the road network every 6.5 minutes, contributing less than 1% to the existing traffic numbers. HGVs will come along a variety of routes (as the waste will not just come from one area or direction) so deliveries will be spread out and the impact on any one route is lessened. Given the site is in an established industrial area, the roads nearby have been designed to cater for HGV movements and the number generated by this development could be accommodated within the existing capacity of the highway network. There will also be route agreements in place between the operator and contracted waste suppliers to ensure major, non-residential roads are prioritised to avoid disrupting communities or residential areas.

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HGV deliveries will be spread out throughout a 12 hour period and, if necessary, will be pre-booked into the plant to avoid busy times during the morning and evening. At no point will HGV vehicles associated with the plant be parked up on the roadside.

The proposed delivery and collection times for the facility are:

Monday to Fridays - 7am to 7pm
Saturday - 7am to 2pm
Sundays - None

The independent highways consultant has studied the potential extra vehicle movements created by the facility very carefully. It is considered that additional road traffic movements are unlikely to cause an issue, nor impact, on the adjacent residential community. This will be also subject to further consultation through the local authority planning process, and verified through its own consultation processes with Highways England and its own Highways department.

Refuse Derived Fuel: The facility will process waste in the form of Refuse Derived Fuel (RDF) and as you note, it is correct to say that the RDF to be treated in the proposed facility will be sourced from wastes which would otherwise not be recycled.

The composition of waste materials that are ultimately processed into RDF are very well understood. Numerous compositional studies have been undertaken over the past decades to ascertain the source composition of municipal wastes in order to devise the most appropriate treatment solutions.

Notwithstanding this, at the present time around 3.5million tonnes of RDF are currently exported from this country to waste processing facilities in Europe via transfrontier shipment (TFS) procedures. Each and every one of these contracts requires that the material has been tested and analysed to meet certain specifications for the end facility and as such a growing library of information has been produced, though much is not in the public domain. The proposed facility will have a similar waste specification and equally, testing requirements for the incoming waste.

Waste treatment in the UK relies on transportation of material from its source to a suitable treatment plant. This takes the form of familiar local bin wagons, which in most cases will transport the collected waste to a transfer station. At this point it is usually loaded into larger vehicles for onward transport to a suitable facility, which could be a landfill, an EfW plant or to the docks for export. The latest Digest of Waste and Resource Statistics shows 26.7million tonnes of municipal waste is handled this way and the same again (27.7 million tonnes) arising from commercial sources.

Whilst the general principle of transporting waste for treatment is unremarkable, it should also be noted that the transport of waste in the North East is fully established and not without significant precedent. The Suez Tees Valley facility in Billingham, for example, has capacity to treat waste from a number of local authorities including Northumberland and the South Tyne and Wear Waste Partnership's waste. A similar 400,000tpa plant is being developed at the Wilton International site to treat waste from Merseyside. There are numerous other examples from around the country of both long and short distance transport of waste, none of which are considered to be problematic to local communities and in fact go largely unnoticed by those at either ends of, and along, the chain.

Safety: With respect to emissions safety, the UK Government is legally bound to the EU limit values and these must not be exceeded. The proposed renewable energy centre will lead to no exceedances of the air quality objectives or limit values, so it will comply completely with the Government's commitments on air quality.

[1]https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607416/Digest_of_Waste_and_Resource_Statistics__2017_rev.pdf

Emissions from the plant are subject to very strict regulation through the Industrial Emissions Directive (2010) (IED). This legislation sets out the maximum limits of any emissions from the plant, with the levels set as a result of years of independent academic peer reviewed research, with a wide safety margin. The emissions from the facility will add very small amounts to existing background pollution levels, typically no more than a few percent of the relevant air quality objectives.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607416/Digest_of_Waste_and_Resource_Statistics__2017_rev.pdf

This is entirely in line with other industrial facilities across the UK and Europe, and despite exhaustive studies, it has not been shown to harm either human health nor the environment.

These types of facilities are highly regulated; it will have to have an Environmental Permit to operate. The Environment Agency (EA) will only issue a permit if it is satisfied the facility will not have a harmful impact on the range of environmental, health and social factors. If the plant cannot comply, it cannot operate - or if it fails to comply once operating, the EA will close it down - as it has done in other areas. For example, the Dargavel plant did not meet the required environmental standards – it was therefore closed down. It would have met the environmental standards in order to achieve a permit but its subsequent operation gave the EA cause to revoke its permit. It is therefore an example of how well the system can work, if operators are not meeting the required standard.

The EU limits have been set in accordance with academic and independent research – the Government's position remains that it is confident that these limits are appropriate to protect human health and the environment. UK Health Protection Agency (the forerunner to Public Health England) stated in 2009 "...While it is not possible to rule out adverse health effects from modern, well regulated municipal incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable." It reiterated this position in 2013, and this remains unchanged, despite recent research this year - see here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384592/The_impact_on_health_emissions_to_air_from_municipal_waste_incinerators.pdf

Much of the evidence cited by opponents and claims about incineration and emissions comes from before the facilities were properly regulated. Since the 1970s, more and more legislation has been introduced so standards have become much tighter to protect the environment and health, with pollutant levels a mere fraction of previous levels. The main causes of poor air quality are every day sources including combustion, engines as well as general industry, transport, heating, and agriculture, with even livestock raising creating a significant impact.

Visual Impact: With respect to the concerns on visual impact, the chimney height is 57m as you note, and this has been set using a computerised model known as a stack height dispersion model. It takes into account the local background air quality levels. This makes sure that the emissions from it are dispersed safely to comply with the strict regulations governing air quality. They are dispersed through the atmosphere at high level to avoid even the remotest possibility of any concentration at ground level as an additional safety measure. The height does not mean that the emissions are harmful, but instead creates an added safety margin.

As was noted by many at the public consultation, the views of the plant are relatively confined to long distance in the main, since its siting has been chosen to minimise the impact on local residents. A special exercise modelled the views from key points with Sulgrave and surrounding areas – the views were generally limited, and viewed against the industrial backdrop of Vantec and Nissan, the building is set in context, blending into the background. Design has been an ongoing process and we have made adaptations throughout the consultation and planning processes. The designs have now been finalised and reflect the final scheme as submitted in our planning application. Following our consultation, the height of the building was reduced by 1.5m to 36m in total and we have increased planting on the western boundary to mitigate visual impact.

Environmental concerns: The accepted method for an applicant to illustrate the environmental effects of any facility is to perform an Environmental Impact Assessment (EIA). As part of the EIA, an ecology and nature conservation assessment was undertaken which concluded that as long as the proposed mitigation and enhancements measures are adopted, the facility will not have significant adverse effects on designated sites of nature conservation or on habitats and protected or notable species. Measures will include pollution prevention and control measures during construction, bird checks and badger surveys carried our prior to any construction work, a lighting scheme to avoid light spill onto bordering and adjacent habitats as well as a landscape scheme to strengthen the habitat corridors and biodiversity opportunities by planting native species and the creation of a pond and hibernacula.

Public engagement: In terms of consultation, this is a robust process and was planned to give the community ample time to respond. We held a public exhibition in July 2016 and three exhibitions in September 2017. A number of activities were undertaken to promote the exhibitions: these included a number of advertorials in the Sunderland Echo, press releases issued to local media, newsletters to those who have signed up to receive project updates and the leaflet drop. Councillors were also notified in order to cascade the information through their networks. Over 15,000 leaflets were distributed to the following postcodes twice in advance of the September 2017 consultation; this distribution area was agreed with Sunderland City Council:

- NE37 2 Usworth / Concorde
- NE37 3 Sulgrave/Usworth Hall
- NE38 8 Fatfield/Barmston
- SR5 3 Hylton Castle/Castletown
- Part of SR5 4 Town End Farm and NE38 7 Washington Village

We also have a dedicated project email sunderlandrec@coastmarcoms.co.uk, which has helped communication with the local community to be two-way. Although our planning application is submitted, we still continue to respond to any queries we receive and we have responded to over 180 individual queries.

Community benefits: Providing electricity to residential homes is not an option currently as it is complex and expensive to retrofit. There are however other benefits to the community through job creation, lower cost of waste handling, lower operating costs for commercial consumers therefore safeguarding jobs and resource recovery through a clean and safe gasification process.

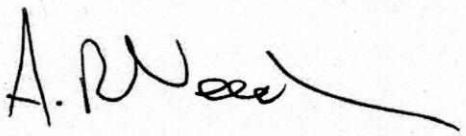
As you have acknowledged, to operate successfully, the plant will require about 30-35 full time employees with a range of skills. It would be the intention to recruit and train employees from the surrounding area where possible. There will also be other employment opportunities through the construction and maintenance of the plant, creating local jobs and supply chain opportunities for local businesses, in areas such as civil engineering, materials, maintenance, etc. The facility also offers a waste management solution within the North East, an education facility will also be incorporated into the scheme, helping visitors and students understand the value and importance of waste management and recycling.

In conclusion, energy from waste is one of the most investigated and scrutinised processes in industry, with some of the most stringent and heavily regulated regimes.

The position of Government, the Environment Agency and Public Health England as well as many academic institutions, including Imperial College, is that the evidence shows that the measures in place to safeguard human health and the environment are ample, with an extreme margin of safety.

We hope that our response addresses your concerns on behalf of your constituents and we would welcome the opportunity to brief you further, or to supply further information if required. Our chief concern is to ensure that the correct information reaches the community, to allay fears and combat the irresponsible spread of inaccurate information, designed to foster anxiety and detract from the real rationale for the facility, which is to protect jobs and the economy in the North East.

Yours sincerely
for and on behalf of Rolton Kilbride Limited



Andrew Needham
Managing Director