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Mr Andrew Needham
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Our Ref: AGH
Your Ref: 17/02085/MW4

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Rolton Kilbride Gasification Plant – Planning Application

Dear Andrew Needham,

Thank you for your letter in response to my letter of objection to the proposed gasification plant in Washington, which is currently under planning application. I appreciate that you have taken the time to respond to me; however, instead of answering my questions, your letter has sparked further questions and a need for clarification which I feel are necessary. Just as you do, I feel this is necessary to ensure clarity on all sides of this issue. I will address each issue in turn.

First and foremost, I would like to address your comments at the beginning of your letter whereby you outline your disappointment that I did not come to you about my concerns to discuss these with you. I thank you for your kind offer; however, in the interest of transparency and openness – by which MPs must act if they are to make representations on a planning application – I felt it was important that my letter was made public and reflected the concerns raised with me by my constituents.

It would be of no use to any of my constituents for me to meet with you privately and that is why I have again made this letter, along with your own public; as this issue is of great significance to the people of Washington and Sunderland West.

Community Liaison Group

It is welcome in your letter that you have stated that you will set up and run a Community Liaison Group to monitor feedback from residents on your concerns. However, the information you have provided on this is rather thin on the ground, and that is why I would welcome further information on this. How will this Community Liaison Group work? Who will sit on it? How will issues be escalated and dealt with? How will agencies, such as the Environment Agency, be involved? It is interesting that you make this proposal, which is all very well, but what is most important is detailing how you will set up such a group and ensure that it is effective? As you say, it is important that all the facts are known to ensure an informed decision can be made.

Waste Management

In your paragraph on waste management you outline that doors will be open for a minimum time only – however, I am interested to know what this “minimum time” is individually and how long this would be in total over one day? In my original letter to you, I did not mention vermin or flies, which as you will know are issues which can occur on industrial sites if not managed correctly.



How can you ensure that vermin and flies will not become a problem when it comes to the opening and closing of doors and allowing vehicles into the incinerator? This is an issue which I have already had dealings with, alongside local councillors in the Teal Farm area, after exasperated constituents have reached out to us for support. I am concerned that this will not be taken into consideration and therefore ask that you outline plans to minimise this problem.

Traffic

You say in your letter that you have considered how vehicles will impact the local area as part of your traffic impact assessment and have estimated (which is all that you can do) that it would be 110 HGV movements a day spread out over a 12-hour period. Yet, this does not take into consideration that this schedule could be broken or be massively interrupted, as I'm sure you can agree, you are unable to control the whole road infrastructure.

You also mention that vehicles will be coming from all different directions – this is not something I would question – but the fact of the matter is that they are all heading to one specific place and this could eventually lead to a bottleneck effect, especially when the plant would be so close to residential areas. You say that the plant would be built in an industrial area, however, this does not take into consideration the proximity to the residential areas close to the industrial site.

On capacity of roads, you state that the number of vehicles could be accommodated within the existing capacity of the highway network. This is now, not in the future. From my own research, I have found that Department of Transport national traffic forecasts estimated a growth of 19% to 55% in vehicle usage on our roads between 2010 and 2040 – I would be keen to know if your findings are based on these percentages?

In your letter you also mention that vehicles associated with the plant will avoid busy times during the morning and evening, yet further down in the letter you mention times such as Monday to Friday between 7am and 7pm and Saturdays 7am to 2pm. As someone who regularly uses the roads of Washington, as do my constituents obviously, I can assure you that if your vehicles were to use that timeframe, then they will in fact hit very busy times on the A1231 and other roads that traverse my constituency.

I was also disappointed that you seem to disregard the issues of a vehicle associated with the plant being parked up on roadsides – which as I stated in my original letter is a problem in Washington. You state that HGV vehicles will not park up on the roads, yet how can this be managed? Under DVLA regulations, drivers are expected to take mandatory breaks. Will these be scheduled to take place outside of Washington?

You mention that an independent highways consultant has studied the potential extra vehicle movements created by the plant and that additional road traffic movement will be unlikely to cause any issues to adjacent residential communities. I am interested to know who this independent highways consultant is? Where is this information that you refer to? And finally, if you will be making this information public? As you say, it is important that facts are fully known but in this regard, you have fallen short of fulfilling that promise here. I'm sure you can agree that it is not good practice to withhold any information that could help my constituents understand this matter better.

Refuse Derived Fuels

You mention composition of waste materials used in gasification are well understood, yet you do not elaborate on this. Therefore, I would be interested to know what these well-understood compositions are as from research and information that has been passed on to me, it is believed



that waste used by these plants can include recyclable waste. This is something that raises great concern because you would be burning waste that you shouldn't and this would also weaken the moves to encourage more people to recycle. How can you assure my constituents and I that this will not be the case?

On your points about numerous compositional studies being undertaken your letter is rather vague on when they were last done and by whom. Therefore, I would welcome the chance for you to outline this information further for me.

Further, you go on to discuss a library of information that has been produced that is not in the public domain – why is this? Has this information been independently verified and assessed? Who holds this information? And why has it not been made publically available? Who has conducted the raft of studies you refer to? As you state at the beginning of your letter, you wish to dispel myths, when in fact, the withholding of information – even if unintentionally – inevitably leads to further questions and concerns being raised.

You also raise points about capacity and refer to other sites across the North where waste is transported and treated. This raises the question of why this plant is necessary if there is capacity across the country already? I am also keen to understand what the building of a plant in Washington will mean for capacity in the country for dealing with waste?

These questions arise not only from what you have said in your letter to me but research I have looked at myself, which shows that our current incineration capacity is at 17 million tonnes (both existing and under construction) but the total tonnage incinerated in the country stands at only 9 million tonnes; meaning we currently have 8 million tonnes of underutilised capacity.

In reference to your points about the long and short distances travelled by waste to be treated and how it goes largely unnoticed by communities, this begs the question of where the Washington plant's waste will be coming from? Will it be short-distance? Or long-distance?

The comment made about going unnoticed clearly fails to grasp just how opposed to this plant the people of Washington and the wider area actually are. As I am sure you are aware, 9,000 people have signed a petition which has been presented to the Council opposing this planning application. It is safe to say that even before it is built, the local community are becoming very much more aware of it and I have no doubt that this would not change but only increase as the effects of this plant are fully realised.

Safety

In this section you have admitted that the building of this plant would increase pollution levels by "no more than a few percent". However, if you had read my letter more carefully, regardless of how small this is, it is still going in the completely wrong direction when it comes to reducing emissions and pollution to improve the air quality to benefit the health and wellbeing of local communities.

I feel this shows a disregard for the people of my constituency with the relaxed attitude that pollution levels would only rise by a small percentage – I would hope you could agree that we should be reducing levels, not increasing them.

You mention exhaustive studies that show little or no harm to either human health or the environment, but yet again fail to outline what this means and where this information is coming from. I am especially keen to know if these are short or long-term studies and what consideration has



been given to future generations? Take for example, asbestos, at one time it was seen as safe and legal to use. Yet over time, we learnt of its effects and how dangerous it is. We have to learn from mistakes made in the past, not keep on repeating them.

Sadly, when you are trying to reassure me about the role of the Environment Agency and the failings of a plant and how they will be closed down, I have to say that this is not confidence building. There should be no consideration that the plant would or could fail. For such a big project to be so close to residential areas, the idea of failure before the spades are even in the ground does not fill me with much confidence.

I found it interesting that you refer to comments made by the Health Protection Agency and how it states that it is not possible to rule out adverse health effects from modern, well-regulated municipal incinerators but it is likely to be very small, if at all detectable. I cannot agree with the conclusions you make from this, as yet again, as I mentioned previously the effects of these new plants are not completely known. This is especially concerning in an area of poor health, especially when it comes to lung diseases.

You reference that the main causes of poor air quality now come from everyday sources, and not from incinerators due to stricter legislation. However, what your point fails to realise is that the building of this plant and the workings of this plant will contribute to everyday activities that add to poorer air quality – such as vehicles you will use.

Visual Impact

It is welcome that you have set out the reasons behind the height of the chimney which are to help with reducing emissions being concentrated at low levels. This is all very well however the argument that you fail to mention and understand when it comes to this plant is the smell that will come from the chimney.

It is not only emissions and the effect on human health which are of concern to my constituents but also the wellbeing and quality of life that they wish to enjoy. Can you assure me and my constituents that this won't be the case, and the chimney height will minimise smell?

On the subject of the views, you mention that the views of the chimney are confined to a long distance, however what this fails to realise is how flat the town of Washington is and that this chimney – as I had already stated in my letter which I feel was ignored – would be higher than Durham House which is the tallest building in the town and can be seen from many different vantage points.

I also find it odd to say that the building is set in a context to blend into the background. Whilst the area in question does have a lot of industrialised facilities, such as Nissan and Vantec, to me your statement reads more as a disregard for the area with an attitude that it is already industrialised so how is some more going to hurt. I don't understand how anyone who lives in the town could see a chimney that is higher than Durham House or such a large building so close to residential homes as blending into the background regardless of the number of trees you plant to mask the plant from up close.

Environmental concerns

In your letter, you mention measures will be taken around pollution prevention and control measures during construction – I would be interested to know more detail about what these are?



Public Engagement

You detail very clearly what work was done to promote your pre-application consultation, and I was happy to raise awareness of these consultations in my social media; however, I feel this justification masks the reality felt by many of my constituents when it comes to the public consultation.

You say that you distributed over 15,000 leaflets to various postcodes across my constituency, yet I am of the understanding from comments made by constituents that some of these arrived with "junk mail" and understandably, constituents may have simply recycled the leaflets immediately on receipt. Was this ever taken into consideration as part of your work to ensure a proper and effective consultation happened?

Of the six postcodes that you refer to in your letter, I would be keen to know how many local residents then contacted you or attended the events that you held? This for me would be the only way to measure the impact of how effective your leafleting actually was. My Constituency office is in a NE37 2 area postcode, and we certainly didn't receive any notifications in the mail by this exercise.

Finally, on this section, I have to strongly criticise you for even considering that 180 individual responses were something to feel proud about on such an important matter like this. Those numbers are hardly representative of the area as a whole, and for me do not seem to be enough to go ahead with this proposal, especially in light of the significant number of people who have signed petitions against this plant being built.

Community benefits

Again, as has been the case throughout my reading of your letter, I would welcome further clarification from you on what is meant by the benefits to the community that you cite in your letter, including: job creation; lower cost of waste handling; lower operating costs for commercial consumers and the building of a centre to educate people on waste management and recycling?

What are the exact benefits to my constituents and how do these outweigh the concerns I and many of my constituents have to this plant being built? It is all very well having a centre to educate people, but when the issues around the possible health ramifications still have not been properly addressed, is this only gloss to distract from the real concerns people will have?

David and Goliath

This matter – which I referred to in my original letter – I believe has not been addressed at all. Sadly, I feel that this and your response give me further reason to believe that my constituents, who live in the surrounding neighbourhoods are being completely disregarded, and the description of their arguments and genuine concerns about their local area are being described and thereby dismissed as misinformation.

I do not feel that these comments would be used about residents who come from far leafier communities in other parts of the region or country. Therefore, in your returning response back to this letter, I would ask that you address the points that I have made about these communities being disregarded without any consideration or convincing engagement with them.



Conclusion

Finally, I have to conclude by saying that I cannot agree with the statement you make at the end of your letter that Government and others believe the evidence provides safeguards for human health. I do not feel that you have provided me, or in turn my constituents, with that information.

I believe that your response has not come close to answering any of my concerns, and has only added further questions which I wish to be answered, so that I and my constituents can fully understand the scale and effect of this decision on our local area.

I look forward to your response.

Yours sincerely,

Mrs Sharon Hodgson MP

Member of Parliament for Washington & Sunderland West Constituency

Covering the Castle, Redhill and St Anne's Wards of Sunderland, and the Washington Central, East, North, South and West Wards.

By email and post

CC by email- Mr Peter McIntyre, Executive Director of Economy & Place, Sunderland City Council
Iain Fairlamb, Head of Planning and Regeneration, Sunderland City Council
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