



**ROLTON KILBRIDE**  
POWERING THE FUTURE™

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Mrs Sharon Hodgson MP  
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22 March 2018

Our Ref- RKL003/ARN/PK

Dear Mrs Sharon Hodgson MP

Thank you for your letter of 19 February 2018. As before, we have endeavoured to address each of your points in turn.

### **Community Liaison Group**

With regard to community liaison groups, the first point we would make is that residents and communities have every right to express their views and receive proper information and representation. In the case of Sunderland, at present, this is through the planning process, following our series of public consultations. This is a fundamental democratic right and one that we have constantly reiterated.

It seems there may be misconceptions about the function of the community liaison group that it would be helpful to correct.

Community liaison groups work well at many other construction projects across the UK. As we noted before, we would set up the group once planning consent has been granted for the project. The planning consent in itself usually imposes conditions and constraints on the project construction and operation. Further constraints will come through the environmental permitting process. So whilst the choice of technology, the location and the capacity of the facility is clearly of interest to the community, these are absolutely outside the scope of the Community Liaison Group and instead a matter for the planning process and the democratically elected members of the committee. In the case of technology choice, this is a matter solely for the permitting process.

Instead, the group is a vehicle to liaise with the community, understand concerns and provide information; it is not a decision making body. As stated before, the precise remit of these groups is usually determined at the outset, working within the confines of the planning consent and also within operational parameters, generally agreed as part of the environmental permitting regime. Depending on the remit, though, it may be able to influence operational and design factors, such as sustainable travel plans, exterior design, planting schemes, visitor facilities.

The general format of these groups is not predetermined, but clearly representing the surrounding community is essential. Representatives are required, so as to keep the committee to a manageable size, and are usually sought through community groups, centres, etc and also from the opposition groups. We request that people represent a network to try and ensure the most effective coverage and community benefit.

**DIRECTORS**  
PETER ROLTON  
COLIN BANYARD  
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We put out a general recruitment call and then depending on the numbers involved, agree a committee of circa 15 – 20. Representatives from the Environment Agency, local planning authority and any other statutory agency or organisation may also be involved on an as-and-when basis. We try to keep the groups apolitical for obvious reasons and encourage bipartisan representation.

Clearly some of your contacts have unfortunately had bad experiences with community liaison groups, so if there are specific examples, with respect to other operators, we may be able to comment further.

We are pleased to report that in our experience, however, they have worked well, even to the extent of winning awards. We have made strenuous efforts to involve those who have been most fervently opposed. So, if it would be helpful, we could perhaps arrange for you to talk to members of other groups to confirm for yourself. Please let us know if you would be interested and we can take this forward.

### **Waste management and odour**

As per our previous correspondence, odour is destroyed as part of the gasification process. The system operates under slight negative air pressure, as large induction fans draw air, including any associated odours, into the process. By drawing air from the waste reception area odorous air is controlled.

### **Destruction of odour and negative pressure**

Odour is generated primarily from bodies of waste that have become anaerobic (or “stagnant”). This is largely avoided for Energy from Waste (EfW) facilities by the proper management of waste flows through the facility; by preventing waste from remaining untreated for too long, the potential for odours is greatly reduced.

The single main source of odours from the facility will be the waste reception area including the bunker. As is standard practice in modern energy from waste facilities, air from these areas will be drawn into the plant. This provides a very efficient mechanism to treat odours as they are destroyed in the hot conditions within the combustion chamber. Therefore, opening the doors to allow vehicle access does not result in air and odours escaping the facility. Instead, air is drawn in and then through to the chamber.

During periods where the process is not operating, measures will be put in place to monitor any odour generated and to control them where necessary. In addition odours are monitored and if necessary de-odourising sprays can be used should an odour problem be identified. The exact measures to be used will be set out in a comprehensive Odour Management Plan, which will be developed as part of the Environmental Permit.

General housekeeping rules also help to prevent smaller accumulations of odorous material that could become a problem. This includes:

- Keeping the facility clean and tidy
- Removing and bagging any spilled materials
- Floors are designed for easy clean-up, including a concrete surface with a positive slope to the drainage systems
- Eliminating crevices, corners and other hidden surfaces, which are hard to keep clean and where waste residues can accumulate
- Treating drainage systems with odour inhibiting solutions (as required) according to monitoring/inspection
- Preventative maintenance programme

Perimeter checks will be deployed and staff (and the public) will be encouraged to report any odours if noticed around the facility. A regular schedule of 'Sniff Points' can be deployed to monitor odours at regular positions. This type of practice is not usually necessary for an operational EFW facility, however they can be used if necessary.

Road sweeping and general housekeeping are important to remove the potential for accumulations of material to build up. This is necessary not just to prevent odours but also forms a key component of the strategy to control pests and to ensure that the facility remains a good neighbour.

Our Regulation 25 response notes additional technical detail within our odour management plan, which is being prepared for the facility. It will be made publically available through both the planning authority and on our website [www.roltonkilbride.co.uk](http://www.roltonkilbride.co.uk) in due course.

### **Vented Areas**

No parts of the building will be 'vented' however there will be openings and doorways to allow access to and from the building and to allow ventilation where necessary. No part of the facility other than the waste reception area presents a risk of odour release and thus these areas do not require any special measures.

### **Odour from deliveries and transit**

Vehicles delivering waste to the plant can only operate under a waste carrier's licence. Operators of those vehicles have a duty of care to ensure that loads are safe and any breaches of this could lead to their licence being removed. In addition to this, the facility can put in place measures to monitor vehicles and unilaterally ban operators or vehicles from site if they are proven to be causing issues.

It is anticipated that waste delivered to the site will be delivered primarily in articulated bulk vehicles. These may be walking floor or ejector vehicles in which waste must be securely contained under Duty of Care legislation. The facility cannot directly control these vehicles, however some contractual measures can be put in place to enforce approved routes, which avoid residential or other sensitive areas, and to ban problematic vehicles or waste streams. It is clearly therefore in vehicle operators' commercial interests to comply.

Vehicles delivering waste to site will tip directly into the waste bunker at the rear of the waste reception hall. This means that material is handled as far from the open doors as possible and as close to the air extraction point as possible. As a result it is highly unlikely that odour issues will arise as a result of these operations, which is supported by the fact that very few (if any) odour complaints have been made against working energy from waste plants employing similar systems.

### **Litter**

Regarding the standards of operations by others, we certainly did not intend that our comments were taken as a dismissal: far from it. We are committed to upholding environmental and community standards, and believe this is crucial to being a good neighbour. We spent several hours talking and listening to residents who had experienced severe problems due to irresponsible and careless operators in the area and for which we have every sympathy. Their comments and concerns were noted and passed on to both the local council and Environment Agency, which enforces the relevant regulations.

Again, you will appreciate we cannot take responsibility for other operators, but as developers, we seek to distinguish ourselves by selecting operators that conform to high and responsible operating standards. If there are specific incidents or breaches, we would normally urge residents to contact the Environment Agency, the council and, in extremis, their MP, in addition to the operator, so that the issue can be taken up with the relevant agency. Communication concerns is also one of the core functions of the Community Liaison Group, so that any issues such as these can be escalated and resolved. In terms of learning from these neighbouring incidents, we do take on board and understand the concerns of residents. We would want to work with them, alongside the operator, perhaps yourself, and the relevant authorities to improve the situation.

### **Vermin and flies**

The process operates on a 24-hour continuous basis and deliveries are restricted, through planning, to a select number of hours each day. For most facilities this is around 12 hours per day during weekdays and a half-day (6 hours) at weekends. Most facilities that operate 24-hour processes are subject to similar restrictions and the storage of waste feedstock is not a novel or unusual issue but a standard consideration.

The main cause of pest issues remains the environment created by waste remaining untouched for long periods, which does not occur in such a plant. .

The facility is equipped with a waste bunker capable of storing approximately 4 days waste feedstock. This allows continued operation over weekends and bank holidays when deliveries cannot be made. When deliveries are stopped over the weekend, approximately 2 days' worth of waste must be stored in the bunker to be processed over the weekend. As stated before, this rapid processing of waste does not constitute a good environment for vermin to breed.

The housefly has a lifecycle of around 10 days between eggs being laid and the flies emerging, however waste is treated within approximately 2 days of entering the facility. In addition, many flies do not tend to travel large distances from their food source. As the bunker is at the rear of the waste reception hall, from which air is extracted in such a way as to ensure airflow is away from the doors, flies do not tend to cause problems at modern EfW facilities.

Any incident that may occur (although extremely unlikely due to the reasons set out above) can be controlled through special insecticides, which disrupt the lifecycle of the flies and prevent them from emerging from the larval stages.

Again, the primary control is to ensure that the site is kept free of detritus and that waste does not accumulate on the site. The continual processing of waste through the facility disrupts the ability of pests and vermin to breed and creates an unfavourable environment for them in any case.

### **Traffic**

We understand that your constituents are concerned about traffic numbers and other issues including parking of HGVs on the highway and personal rubbish being thrown out of vehicles. Please refer to our previous correspondence where we have set out our response to each of these concerns and referred to the relevant studies, which have been undertaken to ensure that the facility does not pose an issue in terms of traffic. We do not underestimate the concerns of residents but equally we have already undertaken thorough consultation and impact studies to ensure that traffic is not an issue for residents.

With regard to rubbish being thrown from vehicles, this is clearly deeply frustrating and unacceptable. It is a civil offence, and should be reported to both operator and the relevant agencies, including the police if necessary.

### **Refuse Derived Fuel (RDF)**

EfW facilities have been frequently built to manage municipal waste (as opposed to other types such as clinical, or hazardous). Modern energy from waste facilities are capable of processing a very wide range of materials because they must be capable of accepting untreated 'black bag' waste. This capability to accept a wide range of materials does not equate to 'a lack of understanding' of the feedstock (in fact the contrary) to the plant, it is simply an acknowledgement of the fact that waste is, as described, the leftovers which people cannot find alternative use for.

The waste composition data provided in our previous response illustrates the variation in composition. A typical waste composition may have around 15 different components including paper, card, plastics, textiles, 'fines', inert material and so on. Each and every component part will fluctuate continuously over time. Any facility designed to process such material, or to process feedstock derived from this material must be designed to manage these fluctuations within a wide tolerance.

The process technology selected for the plant will have an input specification. This will define a range of characteristics of the RDF feedstock, though it will not define the component parts and elements of the feedstock. Instead other considerations are important, such as moisture content, average particle size, calorific value (CV) and so on. Many of these characteristics can be inferred from the composition however they remain in a constant state of flux. Due to this known and understood variation, the facility is designed with appropriate measures and procedures to mitigate any impacts on the process. This manifests itself in the Flue Gas Treatment plant which automatically adjusts to changes in the composition of the flue gas in order to maintain compliance with the environmental permit, while the Continuous Emissions Monitoring Systems (CEMS) monitors the quality of gases leaving the stack to ensure that compliance with the permit is maintained.

These controls are backed up by the waste specification, which acts to prevent unwanted variations such as very significant changes in the CV or moisture, and through the environmental permit, which specifies waste types that can (and by inference cannot), be accepted. The waste specification will include restrictions on ash, water, particle size and CV and will be tested for on a regular basis. This testing is primarily to ensure that the composition of the waste remains understood and to identify any trending changes to the waste. Compliance issues are a separate consideration managed through waste acceptance procedures and emissions monitoring undertaken on site.

Our Regulation 25 response notes additional technical detail which as before, will be made available through both the planning authority and on our website [www.roltonkilbride.co.uk](http://www.roltonkilbride.co.uk) in due course.

### **Recycling and fuel for waste incineration**

We acknowledge there is some debate about the management of waste through energy recovery processes. It is also true that disposal of materials in such plants is final. It must also be recognised that the majority of materials sent for disposal in this way are simply not recoverable or practically usable in other ways, so where waste of this nature exists, so too must an adequate method of treatment or recovery.

Many other systems that seek to recover materials from similar waste streams do so using extensive mechanical and / or biological systems, all of which prolong the treatment process and necessitate the storage of waste materials on site for longer periods. Materials recovered are often of low quality resulting in yet more processing at a later stage. These types of facilities inevitably provide a more hospitable habitat for flies, rodents and other pests and have greater potential for the generation of odours. These facilities do not have the self-contained odour destruction capability of a combustion process and thus must rely on often-problematic odour treatment systems such as biofilters or other similar systems.

Energy from waste facilities offer a hygienic recovery solution for materials which either technically or commercially cannot be recycled. The main current alternative is landfill, which poses numerous other problems and is lower down the waste hierarchy and thus cannot be considered a preferable option. Policy and education is key to driving consumer behaviour and practice, but it is clear that even in the most proactive of situations, such as Wales which has vastly increased its rates of recycling, there will still be materials left over that require treatment.

### **Specific comments**

#### **DEFRA's 2012 position on recycling levels**

We refute the claim that more incineration capacity reduces recycling rates and there is no evidence to support it. DEFRA's latest "statistics on waste managed by local authorities in England in 2016/2017" show that whilst incineration of waste rose by 0.9 million tonnes in 2016/2017, recycling rates also rose by 1.6% in the same period when compared with 2015/2016<sup>1</sup>.

You note DEFRA's position in 2012 regarding Local Authorities' waste management solutions and we do not dispute this. In any case, this facility is not a Local Authority project and is not intended to directly accept local authority waste. As we have stated in our planning application, the facility will process RDF derived from MSW (municipal solid waste) as well as RDF derived from non-hazardous commercial and industrial waste. As discussed above, RDF is the waste left over once all reasonable recycling has taken place. At present the only other options for RDF is either landfill or export so the facility provides an alternative to these whilst generating useful energy in the process.

#### **Waste source and Traffic impacts**

It is too early to determine exactly where the waste will come from on a regional basis, as although studies show there is substantial waste in the area, to tie into contracts at this stage would be premature. That said, there are only so many routes to site and the number of vehicles required for the facilities' capacity is also known. We have therefore been able to assess the traffic impacts quite accurately.

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664594/LACW\\_mgt\\_annual\\_stats\\_notice\\_dec\\_2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664594/LACW_mgt_annual_stats_notice_dec_2017.pdf)

## **Technology Type**

The facility will deploy gasification technology, not conventional incineration technology. While the exact manufacturer of the technology is not yet decided, the performance standards expected have been determined. Rolton Kilbride is undertaking a detailed and extensive supplier selection process designed to ensure that technical and commercial standards are maintained throughout the life of the facility.

Details of start up fuels and similar technical considerations are largely irrelevant to the planning process and are considered in more depth during the Environmental Permitting process. Notwithstanding this, the use of start up fuel is kept to a minimum; however, their use is both mandatory and necessary to ensure compliance with emissions standards.

Support fuel is not necessary to maintain steady state gasification and any reliance on such would be a considerable expense to the project and would be likely to present considerable commercial challenges.

## **Low carbon energy**

The energy centre will provide a source of low carbon energy. The proposed development results in electricity generation with associated GHG emissions of 0.025 tCO<sub>2</sub>e / MWh of electricity generated compared with 0.3820 tCO<sub>2</sub>e / MWh of electricity currently supplied by UK Combined Cycle Gas Turbine technology. This represents a 94% reduction in GHG emissions per kWh of electricity generated. Our initial Greenhouse Gas Assessment will be submitted as part of our R25 response.

As previously mentioned, a supplier is yet to be selected for the facility and therefore we are unable to give you the precise specification of energy import and export, start up fuels, energy content of the waste quantity of oxygen to be injected as well as electricity grid imports and exports, as the detailed design of the facility has not yet been undertaken. Once selected, we may be able to provide a technical briefing to those constituents interested if specific issues arise.

The reference to the Contracts for Difference (CfD) scheme in our previous letter is due to the fact that the UK Government recognises this technology as low carbon. We have not failed to recognise that the CfD scheme is currently under review – the consultation aims to consult with industry to drive more efficiency into the process and also lead to the development of alternative products that can be used in a wide range of applications. Advanced Conversion Technologies (ACT) i.e. gasification and pyrolysis, are able to achieve these aims and at no point was the consultation about abandoning support for ACT. Moreover the facility would be progressed regardless of a CfD award, as the need for a secure source of energy to maintain jobs is paramount.

## **Biogenic content**

The biogenic content of the waste is a function of the waste composition, discussed earlier in this letter. The exact composition will vary throughout the life of the project for reasons also discussed earlier. A large number of studies have been conducted into the biogenic content of waste and waste derived fuels. The REA provides one such example in its "Energy From Waste – a guide for decision makers" report<sup>2</sup> in which residual MSW is found to have 65% biogenic material and 61% in C&I wastes. Under the now defunct Renewables Obligation subsidy, waste feedstock for EfW was 'deemed' to have 50% biogenic content.

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<sup>2</sup> <http://www.r-e-a.net/pdf/energy-from-waste-guide-for-decision-makers.pdf>

These figures are not unusual and can be found repeatedly across studies and publications into the issue. As a result, we can be confident that whilst the precise waste source and composition is not known, the biogenic content and characteristics of the waste are well understood to a small degree of tolerance.

### **Greenhouse Gas Emissions**

With regard to our assessment taking into account:

1. The potential for stabilisation of waste prior to landfilling?
2. Carbon sequestration effects in landfill?
3. Methane capture at landfill?

The answer to the latter two points is simply yes. These are known effects common to all modern landfills and are largely insignificant, particularly when taken in the context of the myriad other negative impacts of landfill operations and the potential for pollution that they present.

Waste stabilisation is undertaken to a small degree in some European countries and the technologies are used in the UK. Waste stabilisation is not without cost. Any process claiming to 'stabilise' waste can only do so by allowing the degradation to occur during a separate process. This is what biodrying technologies achieve and these processes cause a release of (non-fossil) CO<sub>2</sub> to the atmosphere as the waste degrades. They are usually in the simplest terms, large composting facilities, where waste is stored for long periods.

Our assessment takes into account both the methane emissions of landfill, and landfill gas capture schemes in detail, in accordance with DEFRA's "Energy Recovery for Residual Waste: A Carbon Based Modelling Approach"<sup>3</sup>. DEFRA expects 37.5% of landfill gas emissions to be used to generate energy. The remaining are either flared, oxidized to CO<sub>2</sub>, or released directly into the atmosphere, all of which is considered in our assessment.

We respectfully refer you back to your concerns of odour and pest management, which can be an issue for these facilities.

A case study may help to illustrate this point and show why our facility will provide a superior management regime. The Barrow in Furness facility operated by Renewi (formerly Shanks) was plagued with fly and odour issues during its early stages of operation and in fact was closed down for exactly those reasons for some time whilst problems were rectified<sup>4</sup>. The process operated does 'stabilise' the waste, but the resulting product is intended to be used as RDF in EfW facilities. This is one example where mechanical biological solutions simply add another layer of complexity to the waste management system without removing the need for treatment solutions such as that proposed by Rolton Kilbride.

### **Rolton Kilbride**

On the final page of our previous letter we state that we are a responsible developer with experience in this area, not operator as you state. The distinction is crucial. We do not operate gasification plants ourselves.

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<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=19019>

<sup>4</sup> <https://www.letsrecycle.com/news/latest-news/shanks-suspends-cumbria-mbt-operations/>

We do however, take our role as developer very seriously and place due regard on our operating partners, having publically committed to high standards throughout the planning process. We have three facilities for which we have successfully gained planning permission; Castle Bromwich (Birmingham), Hams Hall (Birmingham) and Templeborough (Rotherham). We will be appointing appropriate and experienced operators at these projects once commercial negotiations have been finalised. Should planning permission be granted for the energy centre in Sunderland, the same will apply.

Finally, we would like to note that a number of the concerns expressed in the letter are verbatim or similar in content to the UKWIN website. This site provides an admirable resource for campaigners, but we, along with much of the industry, query the accuracy of some aspects of the content. It is currently hosting an apology - at our request - as a result of some claims made by the website's author and owner, Shlomo Downen.

Once again, we hope this clarifies matters for you and addresses the concerns of your constituents constructively and clearly.

Yours sincerely  
for and on behalf of Rolton Kilbride Limited



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Managing Director

c.c. Ms Irene Lucas, Chief Executive, Sunderland City Council  
Mr Peter McIntyre, Executive Director, Economy & Place, Sunderland City Council  
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