



HOUSE OF COMMONS
LONDON SW1A 0AA

Sharon Hodgson MP

Suite 1 and 1A,
Vermont House,
Concord, Washington,
Tyne & Wear NE37 2SQ
Tel. (0191) 417 2000

hodgsons@parliament.uk

Sent by email

22nd January 2020

Dear Planning Inspectorate and National Planning Casework Unit,

I write to request that the Secretary of State for Housing, Communities and Local Government recover the appeal for Sunderland City Council application reference: 17/02085/MW4 and PINS appeal reference: 19/00035/REF. The name of the applicant is Rolton Kilbride Limited and the location of the application site is in my constituency, Hillthorn Park, NE37 3HZ. The relevant Planning Inspectorate Case Officer is Alison Dyson and can be contacted on alison.dyson@planninginspectorate.gov.uk.

The appeal inquiry begins at 10am on Tuesday 18th February 2020 and will run for 8 days. The relevant contact details for Sunderland City Council are as follows: 0191 561 7920 and dcapeals@sunderland.gov.uk

As set out in my letter to the PCU on 21st August 2018 requesting the call-in for this application, I believe that this particular planning application merits a recovery appeal because it conflicts with national policies on important matters and raises signification questions regarding the interpretation of those policies for RDF-based gasification plants. The applicant has evaded scrutiny for too long with long-held questions remaining unanswered. Thousands of constituents have signed a petition opposing the application and many have written to me expressing their concerns. I fundamentally believe that this application, if approved, will be to the detriment of my constituent's health and wellbeing. I set out further concerns below which I hope you will consider.

Conflict with national policies

The application conflicts with national policies on important matters such as the need to limit climate change impacts and the need to manage waste in accordance with the waste hierarchy as set out in:

- The National Planning Policy Framework (NPPF)
- The National Planning Policy for Waste (NPPfW)
- The Waste Management Plan for England
- The 25-year Plan for the Environment



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The amenity impacts arising from the application also go against relevant national policies, including those set out in the NPPF and in the Planning Practice Guidance for Renewable Energy.

Significantly, the applicant has decided to submit a full planning application for a gasification plant prior to having decided on the form of gasification technology that would be used. This raises nationally significant questions about the extent to which the planning proposal can be said to be compliant with various policies where the answer could depend entirely on the specific choice of technology which has yet to be made.

Similarly, the proposal raises serious questions about the extent to which an Environmental Statement can be considered 'complete' when so many of the impacts are unknown or impossible to verify or even to adequately assess.

Lack of this sort of detail was an issue considered in the determination of a planning appeal for a gasification plant in 2015 (Ref. APP/H4315/A/14/2224529) where Inspector Middleton dismissed the appeal and noted that: "Despite the opportunity provided by the adjournment, the Appeal proposal does not include a detailed specification of the type of gasification technology to be used".

It is important to consider the implications for how a similar circumstance should be assessed with respect to more recent national planning guidance which places an even greater emphasis on understanding CO₂ and waste hierarchy impacts of proposed facilities using technologies such as gasification.

There is also a potential conflict between the planning application, which might end up operating as a disposal plant at the bottom of the Waste Hierarchy, and page 77 of the Government's December 2019 Resources and Waste Strategy, which states "we will [...] ensure that all future Energy from Waste plants achieve recovery status."

Significant effects beyond the immediate locality

The applicant has described the proposed facility as being a 'Regional Facility', and the applicant has not limited the catchment area for feedstock to Sunderland, but has instead assumed significant movement of discarded, and potentially recyclable, material through the North East region. This could have significant adverse impacts on both transport and recycling rates in the region.



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The climate change impacts referred to above are of significance beyond the local area, not least because the proposed facility could be expected to release millions of tonnes of CO₂ during the anticipated lifetime of the facility.

The pollution that would be emitted from the stack and from the transport to and from the facility would also have serious adverse impacts well beyond the immediate locality.

Significant architectural and urban design issues

The Environment Agency has raised concerns about the design of the proposed facility, including in relation to the management of odours.

Additional concerns

On 27th June 2018, I chaired a meeting with Rolton Kilbride and some representatives of local residents at St Michael and All Angels Church Hall, NE37 3BN, to discuss concerns about the application. During the meeting, local residents raised serious concerns including all those already mentioned herein and especially: how close the application will be to schools and houses, effects on public health, impact on house prices and about the lack of research on the type of technology that will be used.

Thank you for your consideration.

Yours sincerely,

A handwritten signature in black ink that reads "Sharon Hodgson".

Mrs Sharon Hodgson MP

Member of Parliament for Washington & Sunderland West Constituency
Shadow Minister for Public Health