



R & K Wood Planning LLP

Our ref: RW/JF

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Dear Sir

Sunderland Core Strategy and Development Plan – Matters, Issues and Questions

Submission of behalf of Thompsons of Prudhoe in relation to :

Matter 8

Policies in relation to Minerals and Waste

1 Consistency with National Policy

1.1 Whether the Minerals and Waste policies of the Plan are positively prepared and consistent with national policy?

My name is Katie Wood of R & K Wood Planning and I represent Thompsons of Prudhoe which is a regional construction, demolition and quarrying company based in Prudhoe in Northumberland. Thompsons of Prudhoe own and operate Springwell Quarry which is located just to the north of Springwell village. Despite its name, the site is no longer quarried for mineral but instead operates as a 'One Stop Shop' for the construction industry. The site receives, recycles and treats non-hazardous waste, mainly consisting of construction, demolition and excavation waste and it also imports, stores and sells primary aggregate and produces ready mix concrete.

These representations are submitted to support previous representations made under Comment ID 191, 192 and 193.

I have reviewed the comments made in the Compliance Statement (SD.66) as well as the Inspector's initial questions and the Council's response.

My representations cover the waste policies, Policies WWE6 to WWE10, and supporting paragraphs, that are aimed at facilities used for the treatment and disposal

of waste. My initial representation is based on the fact that the policies, and supporting text, are aimed at the municipal waste stream which makes up a very small proportion of the overall waste stream. The policies and text only occasionally acknowledge and address commercial, industrial, construction, demolition and excavation waste as well as the specialist waste streams such as clinical and hazardous waste. This is despite the fact these waste streams make up the majority of waste produced in the Council's area and indeed in any area.

All of these different waste streams are referred to in the Waste Arisings and Capacity Requirements Report July 2017 (SD.55). In addition, Appendix 10 of SD55 lists all of the waste sites in the Council's area, dealing with municipal and all other industrial and commercial waste streams, and I note that paragraph 13.155 of SD66 refers to this appendix to justify the fact they are safeguarding waste facilities.

In SD.55 the conclusion is that there is capacity surplus for recycling and treatment facilities for all waste streams and no additional facilities are required. It then goes on to state that there is a capacity gap in relation to hazardous and non-hazardous landfill in the Council's area, however this could be met elsewhere within the region or by increasing recycling rates. Overall, it is acknowledged that waste tends to be dealt with on a regional basis and the conclusions of this report (SD.55) are not disputed. However, the fact that increasing recycling rates are being used as a reason not to make provision for additional landfill capacity, underlines the fact that there is a need to support and safeguard the existing recycling facilities area. In relation to Springwell Quarry, which currently processes 1/3 of the C&I and CD&E waste stream in the Council area, the loss of the facility would have a significant impact on the recycling of waste in the immediate area and the region.

Despite this, the Council only seek to safeguard facilities that deal with municipal waste and do not seek to safeguard facilities that deal with other waste streams.

I would draw the Inspectors attention to Policy WWE8, Table 2 and paragraph 11.43 as this text deals with safeguarding existing facilities, but limits this safeguarding to municipal waste facilities. Table 2 should be extended, or an additional paragraph should be included into the text, that includes all of the sites identified in Appendix 10 of SD55. That said, it is acknowledged that a number of the smaller waste facilities referenced in Appendix 10 may not be fundamental to the delivery of the waste strategy for the Council, so for example (vehicle depollution facilities, car breakers, metal recycling) however some of them, for example Springwell Quarry and particularly those which are defined as recycling, treatment and waste transfer, will be fundamental to delivering the waste strategy and this must be acknowledged. This will ensure that the Local Plan is consistent with the evidence base (SD55) by referring to all waste streams and not just the municipal waste stream. If these additional facilities are not safeguarded, then there is a potential that the Authority will be unable to recycle/ treat/ process commercial, industrial, demolition and excavation waste in the future and this runs contrary to the NPPW and the Council's own evidence base.

Going forward, planning decisions will be based on the policies and paragraphs in this plan and it is therefore important that these additional facilities are acknowledged and /or safeguarded within the context of the plan.

Paragraph 56 (as listed in documents (EX1.008, 009 and 010))

I would agree with the Inspector that Policy WWE8 relates to the re-development of waste sites themselves rather than being to protect them from development nearby. I would fully support the Inspector in seeking to ensure that Policy WWE8 is amended, or a new policy included into the plan, to ensure that existing waste management facilities are protected from other development in close proximity to their sites.

I note the comments in EX1.010 (paragraph 56) that states that the Council is to propose a modification to the plan to address this issue.

I shall look forward to reviewing this modification

Yours faithfully

A large black rectangular box redacting the signature of Katie Wood.

Katie Wood
On behalf of Thompsons of Prudhoe