



Minerals and Waste Joint Plan

# Minerals and Waste Joint Plan Issues and Options Consultation

## Summary of Responses July 2014

## **Minerals and Waste Joint Plan Issues and Options Consultation 14<sup>th</sup> February – 11<sup>th</sup> April 2014**

### **Summary of consultation responses**

The issues and options consultation pulls together the issues raised through the first consultation phase and from evidence gathering and sets out a range of options to address these. The consultation asked stakeholders to consider the issues and decide which is the most suitable option or options to deal with each issue.

#### **Consultation**

The Issues and Options consultation ran for eight weeks from 14<sup>th</sup> February to 11<sup>th</sup> April 2014.

The Issues and Options consultation was publicised through a range of means consisting of:

- Press release issued jointly by the three authorities, plus an additional 'reminder' press release two weeks prior to the close of the consultation;
- Article in the NYCC electronic newsletter NY NOW (4,014 subscribers);
- Posters displayed in libraries and on parish council notice boards;
- Twitter and Facebook announcements by all three authorities;
- Information on the Joint Plan webpage.

A wide range of consultees were contacted either by letter or by email. All consultees were sent details of the consultation along with either a paper or electronic copy of the summary leaflet. Details of how to access other documents on the Joint Plan website and how to make comments were provided in the letter or email, with an option of receiving paper copies also given if requested. A reminder email or postcard was sent to each of the 'specific' consultees and Parish Councils two weeks prior to the close of the consultation.

The summary leaflet, background paper and comments forms were also made available in libraries throughout the Plan area and in the offices of each of the three authorities.

A number of drop-in sessions were held in 10 libraries across the Joint Plan area and in the City of York Council's main headquarters. These were advertised in the press releases, on posters, on the consultation page of the Joint Plan website and within the letters and emails sent directly to consultees. The drop-in sessions were held from either 1pm – 6pm or 2pm – 7pm (depending on library opening times). The drop-in events were visited by a total of 92 individuals.

A total of 2,408 comments were received from 332 respondents. The breakdown of respondents is:

- 13 Local Authorities
- 37 Environment and amenity groups, consultants / Agents or other organisations
- 231 individuals or local businesses
- 24 minerals and waste industry
- 19 parish councils
- 7 statutory bodies
- 1 Internal department

# MWJP Issues and Options Consultation- Summary of Responses

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

**Section:**                      **001: Background**

**Chapter:**                      **1**

**Policy No:**

2981		2278	1.15-1.1	An important consideration to have in mind when developing the strategy is 'if development is to be truly sustainable it must meet our needs now but not detract from the wellbeing of our future generations'. One of the key words here is 'needs'. We should look very carefully at what are needs really are.
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**Chapter:**                      **2**

**Policy No:**

2250	York, North Yorkshire and East Riding Local Enterprise Partnership (YNYER LEP)	0901		Greater emphasis needed on the economic benefits from mineral extraction. The Plan should take account of the LEP Strategic Economic Plan which gives significant weight to the proposed York Potash Mine in generating significant economic benefit, within and outside of the national park.
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585	Green Hammerton Parish Council	0534		The evidence base only includes NYCC projections of population growth and waste arisings which have not been independently checked.
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Respondent Number/Name

CommentNo Paragraph Sites

Comment

2197 CPRE (Harrogate)

1060

The evidence is well illustrated and has clear understandable wording. Takes into account cross boundary issues, options and policy. There is evidence relating to local aggregates availability being assessed and current position put forward. Support the use of Managing Landscape Change project to restore the landscape. Sites should be discounted if not restored to land fit for arable purposes, do not need any more water based restoration.

Account must be taken of Best and Most Versatile Land. Need sites to be on low quality land and have high yield. Sites where gravel is difficult to get at should be discounted. Select sites away from important landscapes, sustainable transport is a high priority. Quarry extensions more acceptable than new ones.

Need to reduce the colliery waste in Selby.

Potash is being considered in the Plan. Gas extraction in Pickering is essential to meet the needs of the community. Building stone is scarce and should stay within the Plan area.

Look into developing new rail infrastructure.

Highly valued landscape and natural built and historic landscapes need to be protected.

2849

0253

The NPPF has a pro development stance which is not reflected in the Plan. NYMNPA has a duty to foster economic and social well-being of local communities and the LEP's Strategic Economic Plan gives weight to York Potash's Proposal. The Plan should acknowledge these will be met by the York Potash Proposal.

The Plan should acknowledge that potash is a nationally important mineral as is reflected in NYMNPA Core Strategy and Development Policies.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2609 York Environment Forum	2212			The plan (Chapter 6) should take account of the EU " Resource Efficient Europe" resolution which starts the legislative process of rendering illegal the incineration of any recyclable or compostable material within the EU by 2020.
2841 Scarborough, Whitby and Ryedale Green Party	0186	2.06		Agricultural land of the 'best and most versatile quality' must be protected as the supply of food is more important than the supply of minerals.
2943 Yorkshire Coast Minerals Association	0592	2.06		The Minerals and Waste Joint Plan has to comply with the NPPF which has a pro-development stance. Under the NPPF 'great weight' should be applied the economic benefits that occur from mineral extraction. The economic benefits that will be derived from the proposed Polyhalite mine in NE Yorkshire will benefit both the Local and National Economies. Royalties to local minerals rights holders will be channelled back into the National Park area, benefiting both the inhabitants and the local landscapes, as cash will be available to fund environments projects.
2841 Scarborough, Whitby and Ryedale Green Party	0188	2.14		All areas which are at risk of flooding and those which are Ground Water Protection Zones should be kept totally free of shale gas extraction and any other operation which could similarly result in pollution of land or water supplies.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

121 Environment Agency

1261

2.14

Pleased to see flood risk and groundwater protection are included in the spatial portrait of the joint plan area, ask that 'principal aquifers' are noted within this paragraph as well. This is necessary due to the potential impacts that minerals projects in particular may have on them. Suggest the following rewording  
'Large parts of the lower lying areas of the Joint Plan area are at risk from flooding, particularly around the York, Selby and Vale of Pickering areas. Parts of the Plan area lie on Principal Aquifer designations, which usually provide a high level of groundwater storage. They may support water supply and/or river base flow on a strategic scale, and therefore need additional protection. In addition to this, areas of land around Northallerton, the area to the west of York, the area to the south of Selby and the southern parts of the North York Moors National Park in particular are classified as Groundwater Source Protection Zones and most of the lower lying parts of the Plan area are classified as Nitrate Vulnerable Zones, where water quality also needs to be protected'

968 Womersley Parish Council

0728

2.16

Air Quality Management Areas may change in light of existing and proposed developments in Selby, Southmoor Energy, CCG Plant Knottingley, Drax and Eggborough. Kellingley Colliery, Womersley Colliery Spoil tip Site.

3005

1868

2.16

Uncertain about what Air Quality studies have been done in the Plan area, so how do you know what the air quality is. A precautionary principle should be applied to particulate matter in the area. There are potential major cumulative impacts on air quality due to existing and proposed major developments in the area such as power station, biomass, incinerators, collierys and the Womersley tip site.

2954 \*\*\*Do Not  
Consult\*\*\*Consulted Under  
2953\*\*\*

1930

2.16

Air Quality Management Areas may change in light of existing and proposed developments in Selby such as Southmoor Energy, CCG plant at Knottingley, Drax and Eggborough, Kellingley Colliery and Womersley Colliery tip site.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2955 ***Do Not Consult*** Consulted Under 2953***	1942	2.16		Air Quality Management Areas may change in light of existing and proposed developments in Selby such as Southmoor Energy, CCG plant at Knottingley, Drax and Eggborough, Kellingley Colliery and Womersley Colliery tip site.
2953	1956	2.16		Air Quality Management Areas may change in light of existing and proposed developments in Selby such as Southmoor Energy, CCG plant at Knottingley, Drax and Eggborough, Kellingley Colliery and Womersley Colliery tip site.
121 Environment Agency	1273	2.18		Support inclusion of a paragraph regarding ecosystems
121 Environment Agency	1274	2.19		Support inclusion of a paragraph regarding green infrastructure
2981	2279	2.20		Considers there to be a mismatch between the NPPF concept of 'minerals should be used sustainably' and the extraction (and use). There is no 'sustainable use' of any further fossil fuels unless there is a fully working and fail-proof CCS mechanism, which there isn't.
2998	1816	2.20		The MWJP should reflect the NPPF which states that great weight should be given to the economic benefits of minerals extraction and that minerals should be used sustainably. Aggregates, brick clay, silica sand, gypsum, salt, fluorspar, coal, gas, potash and building stone are of local and national importance. This should be reflected in the MWJP.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
250 Dart Energy (Europe) Ltd	0837	2.20		This paragraph notes minerals of national and local importance "aggregates, brick clay, silica sand, gypsum, fluorspar, coal, gas and potash and building stone". Hydrocarbons should be mentioned as these are also referenced in the NPPF.
252 York Potash	1038	2.20-2.2		This section does not currently recognise recent changes in national planning policy as prescribed in the NPPF. As drafted it is considered to be inconsistent with the NPPF and would not meet the tests of 'soundness' for the following reasons: 1) no mention of the requirement for LPAs to give 'great weight' to the benefits of mineral extraction, including the economy. 2) no mention is made of the clear recognition in the NPPF that minerals are 'essential to support sustainable economic growth and our quality of life' 3) no mention is made on how the 'major development test' will be applied in accordance with paragraph 116 of the NPPF. 4) no mention is made of the need for the planning system to ensure a steady and adequate supply of industrial minerals.
113 Howardian Hills AONB	1619	2.25		Reference to the 'major development test' is confusing as it is a phrase which only relates to the National Park. It stems from the National Park Circular, AONBs do not have an equivalent document and there is a risk that this is interpreted as 'a test to decide whether a proposal is major development or not' as opposed to 'a test against which major developments will be judged'. The AONB takes the first interpretation as it is para 116 of the NPPF which is the critical wording. Currently problems are around what development should be considered major, rather than a test used to determine the application once it is decided it IS major.
231	2135	2.26		Under EU policy add the 'Resource Efficient Europe' resolution, this calls for legislation to be brought forward to render illegal the disposal by incineration or landfill of recyclable and compostable waste by 2020.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1541	2262	2.27		The waste hierarchy should be adapted to take account of the fact that disposal by landfill of dried, inert materials is less environmentally damaging and more sustainable than the incineration of carbon-heavy arisings, with or without, energy recovery.
231	2136	2.27		Broadly support the version of the waste hierarchy used in the Plan with one proviso, the landfilling of dried inert materials is less environmentally damaging than the incineration of carbon heavy arising's without energy recovery.
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2954	1931	2.28		In relation to colliery spoil the NYCC Minerals Local Plan 6/3 requires the applicant to have undertaken a comparative study of alternatives using the 'Procedure Manual Evaluative Framework: Assessment of Alternative Colliery Soil Disposal Options'. There is evidence in other areas that this is undertaken, but no evidence in NYCC. This should be a pre-requisite of a planning application relating to the disposal of colliery spoil.
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2956	1972	2.28		In relation to colliery spoil the NYCC Minerals Local Plan 6/3 requires the applicant to have undertaken a comparative study of alternatives using the 'Procedure Manual Evaluative Framework: Assessment of Alternative Colliery Soil Disposal Options'. There is evidence in other areas that this is undertaken, but no evidence in NYCC. This should be a pre-requisite of a planning application relating to the disposal of colliery spoil.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3005	1869	2.28		There is little evidence in the plan of a strategic view being taken across minerals and waste management from the perspective of using colliery spoil to fill quarry voids, rather than having to import products to fill them. This would allow waste to be moved up the hierarchy.
2955 ***Do Not Consult*** Consulted Under 2953***	1944	2.29		Supports the use of colliery spoil to fill quarry voids which should be facilitated by the LPA, this will also move waste up the waste hierarchy.
3005	1870	2.29		There is little evidence in the plan of a strategic view being taken across minerals and waste management from the perspective of using colliery spoil to fill quarry voids, rather than having to import products to fill them. This would allow waste to be moved up the hierarchy.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1434	2.29		AWRP is not located close to users of heat and there is no potential to utilise CHP.
121 Environment Agency	1275	2.35		Reference should be made to the forthcoming LNP Strategy which could inform GI issues relating to the Joint Plan
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1435	2.43		AWRP is sited on prime agricultural land for livestock and therefore is counter to one of the aims of the Strategic Economic Plan.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
252 York Potash	1039	2.43		The MWJP is expected to take account of the LEP and its Strategic Plan. The emerging SEP gives significant weight to the York Potash proposal given its potential to stimulate considerable investment and economic opportunities.
171 North Yorkshire Waste Action Group (NYWAG)	1010	2.44		Independent outside evidence should be used to provide a variety of technology uses for waste. The projections of waste arising's are out of line with local and national trend of waste per capita is falling. Use realistic future waste arising's and reuse and recycling rates in line with best practice.
2981	2281	2.45		Fully support the CYC's Climate Change Framework and Action Plan, and asks that the MWJP is compatible with this.
2841 Scarborough, Whitby and Ryedale Green Party	0251	2.46		I agree with the response from the initial consultation which is 'the overall view is that shale gas extraction should not be permitted.'
250 Dart Energy (Europe) Ltd	0838	2.46		Although this section reflects consultation responses received to previous consultations, we consider it necessary to highlight that although consultation responses reflect the desire that shale gas extraction should not be permitted, this is contrary to the NPPF.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2215	2.46		<p>Bullet point - ' The overall view is that shale gas extraction should not be permitted', this needs to be more closely defined. Unconventional gas extraction includes shale gas extraction by hydraulic fracturing. CMM by dewatering the coal seam followed at some point by stimulation of the coal seam by hydraulic fracturing, and UCG involves setting fire to the coal seam at depth. These three operations will need to be separately assessed and not confused with each other. Did the Consultees mean only shale gas operations must not be permitted or any unconventional gas extraction. The draft plan is vague about unconventional gas extraction issues and this is of concern considering the potential impact on the spatial plan and future waste streams. The evidence papers do not provide sufficient concrete detail on any aspect of unconventional gas extraction on which to base sound strategic and regulatory decision for the Plan area.</p> <p>All aspects of unconventional gas extraction need to be understood by the Joint Authorities.</p>
231	2137	2.46		<p>Opinion on AWRP should be more honestly represented. NYWAG and YRAIN jointly presented petitions to CYC and NYCC opposing the project which contained more than 10,000 signatures.</p>
3005	1871	2.48		<p>Planning systems should not duplicate the work of other bodies. There needs to be collaboration, cooperation and effective communication between those bodies, with clear and transparent roles and lines of responsibility available in the public domain. This will ensure that the public have confidence in the system. These bodies that have responsibility must have the ability to ensure they can enforce whatever safeguards they put in place.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2216	2.48		<p>It is vital that before granting planning permission the MPAs are satisfied that all issues arising can or will be adequately addressed by related regulatory bodies, the paragraph should include this. The MPAs should have and publish as an appendix or evidence paper a clear outline of the different authorities involved and the precise responsibilities of each with regard to the 4 stages of unconventional gas extraction. The Plan should state that planning permission will depend on a clear and detailed regulatory framework agreed between all regulatory bodies at national/local level on the basis of sound information.</p> <p>A European level paper in 2013 provides a detailed analysis of European member states legislation highlighting gaps that need to be addressed and supplying a detailed assessment of potential risks and recommendations for mitigating and regulatory measures at each stage of unconventional gas extraction. There is nothing comparable from our Government, the 14th round licencing plan does not address these issues sufficiently clearly so the burden falls on local authorities.</p>
2954	1933	2.48		<p>***Do Not Consult***  Consulted Under 2953***</p> <p>The planning system should not duplicate the work of other regulatory bodies, but it should ensure that systems are in place to ensure collaboration and information sharing between these bodies to protect the public. Robust systems should be in place.</p>
2956	1974	2.48		<p>***Do Not Consult***  Consulted Under 2953***</p> <p>The planning system should not duplicate the work of other regulatory bodies, but it should ensure that systems are in place to ensure collaboration and information sharing between these bodies to protect the public. Robust systems should be in place.</p>
968	0731	2.48		<p>Womersley Parish Council</p> <p>It is agreed that the planning system should not duplicate the work of other regulatory bodies, however it should ensure that systems are in place to ensure collaboration and information sharing between these bodies to protect the public. Robust systems must be in place.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1277	2.49		<p>A SFRA is being prepared for the plan area, this should be included in the evidence base documents. Even as a draft it should be given due weight when considering site locations for minerals and waste developments. The CYC SFRA should be included in the evidence base.</p> <p>EA Catchment Flood Management Plan (CFMP) and Catchment Abstraction Management Strategy (CAMS) for the area should be included as could influence future development locations and design.</p>
3006	2217	2.50		<p>More information about unconventional gas needs to be provided in the evidence base and topic papers to provide a sound basis for policies and future decision making. Sources of information may be the European Study 2013, Tyndall Centre Study, Food and Water Watch 'Social Cost of Fracking', Environment America study 'Who Pays the Cost of Fracking'.</p>
1100 Aggregate Industries	0532	2.52		<p>The LAA needs to be kept up-to-date to ensure a sound and credible evidence base.</p>
2310 Commercial Boat Operators Association	0069	2.53		<p>Supply of marine dredged aggregates means that water transport can be used, so reducing road congestion and carbon emissions. The document states that this is unlikely to occur within the short term (5 years) , why is this?</p> <p>The CBOA is investigating potential sea dredged possibilities at present, and also believe that the economics are favourable. Pressure should be applied for this to happen in order to eliminate further areas of National Park from being opened up as quarries for aggregate supply.</p> <p>There is no mention of marine dredged sand from the River Ouse at Nun Monkton, this occurred up to the 1980's and was barged from there to York. Perhaps this could be investigated. Are there other river bed sites where deposited sand or gravel is suitable.</p>
292 The Crown Estate	1217	2.53		<p>None of the options presented effectively reflect the important role that marine-won minerals can make to supply in this region, as identified in Objective 4.</p> <p>As the mineral owner (excluding Coal, Oil and Gas) for the UK continental shelf, we are uniquely placed to provide a strategic overview of marine aggregate opportunity. We support the research undertaken by NYCC into the contribution that marine-won mineral can make. Documents of interest include 'Marine Aggregates: Capability and Portfolio 2013' and a BGS Report of mineral resources in the UK marine area which provides context on the resource for marine-won aggregates.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2218	2.56		<p>The Urban Vision report includes no projection of future waste streams to 2030 arising from the 3 unconventional gas methods. Given the volumes of solid and fluid waste this cannot be omitted.</p> <p>All the unconventional gas industry waste streams should be projected against the different scenarios.</p> <p>The type of waste water treatment needed and projected land take for unconventional gas operations should be researched and outlined. Currently no method of waste water treatment has been provided to remove all the contaminants from the water used in unconventional gas operations.</p>
3006	2220	2.58		<p>As the landscape impact of unconventional gas extraction is potentially severe the study should be extended to include specific appraisal of and recommendations regarding unconventional gas developments from pre-application at the exploratory phase to post production reclamation.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1174	2069	2.58		<p>If the Managing Landscape Change report was used to produce policies which change agricultural and historic landscape into lakes and bogs then the policies will be susceptible to challenge as it is felt the report is biased and inaccurate. Particularly concerned about prehistoric landscape of the Ure/Swale interfluvium which is a landscape of international archaeological significance and specifically Thornborough Moor.</p> <p>The Managing Landscape Change Project seems to be promoting a one size fits all strategy which is based on flawed premises and associated flawed guidance. NYCC largely ignores the North Yorkshire and York Landscape Characterisation Project which provides mineral guidance.</p> <p>It is important that an evidence base for all landscapes is developed to identify their distinctive qualities especially for landscapes under greater pressure.</p> <p>Do not agree with the recommendations of the Managing Landscape Change Project as they are contrary to the guidance/recommendations in the North Yorkshire and York Landscape Characterisation Project and Thornborough Moor and its setting. The MLC project made the recommendations without studying the area on which it based the flawed landscape model which was rolled out for the whole plan area.</p> <p>The MLC study was not consulted on and is fundamentally flawed, it provides recommendations for planning. The report states 'Nosterfield: an example of the benefits of a landscape modelling approach to characterising archaeology'. This section gives inaccurate information about the extent, quantity and duration of extraction at Thornborough and gives largely unreferenced advice that high grade agricultural land may be destroyed by extraction and nature reserves created in its place. This misinformation gives a positive steer to those who wish to carry out extraction in the area. The recommended predictive landscape model is flawed, it allows the removal of prehistoric landform and creation of lakes. Problems based on use of OS map contours to predict the likelihood of prehistoric remains, from that it infers that the land below a given contour was too wet for human occupation. Only a matter of meters away from where the predictive landscape model was initiated at Nosterfield lies Upsland Scheduled Ancient Monument which is below levels predicted by this model, proving it does not work. Need experts to run the model and the problems to be recognised. More detailed research of Thornborough is needed to understand the archaeology, its landscape context, setting and significance.</p> <p>Sand and gravel extraction poses a threat to prehistoric landscapes and it is felt that in the Thornborough area the landscape is 'in crisis' in terms of development pressures including minerals extraction and damage that has been caused through poor planning</p>



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
				decisions. There appears to be a contradiction in NYCC evidence between the MLC study and Evidence Paper 4: Cross Cutting Issues.
3006	2219	2.61		Figure 5 - the map is too vague in terms of unconventional gas, need to include - areas underlain by the Bowland Shale formations - areas underlain by deep coal at 50m -1200m below the surface. - present estimations of extractable gas reserves in the above - the extent of new PEDL licence areas likely to be offered in summer 2014
252 York Potash	1037	2.61		The text fails to recognise the degree of importance that the NPPF places on minerals. The York Potash site is present and workable and has been certified under the JORC code, which sets the minimum standards for public reporting of mineral Exploration Results, Mineral Resources and Ore Reserves. This has resulted in a Probable Ore Reserve of 250 mt of Polyhalite with a mean grade of 87.8% Polyhalite, equating to an estimated reserve of 20billion and a resource to 200billion. These figures put the 'Great weight' into perspective.
2310 Commercial Boat Operators Association	0072	2.69		Rail is also used to transport fuel (coal and biomass) and also ash away from the power stations and spoil from the coal mine.
3006	2221	2.70		Information needs to be added about unconventional gas and potential land areas for present and future developments and issues related to this.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1562	2.72		The Mineral Spatial Map should include underlying aquifers as these are significant constraints to mineral development so that these features and their special effect can be clearly understood.
3006	2222	2.72		Figure 7 - The Minerals Spatial Map demonstrates that there is no suitable space for extensive and intensive land take for unconventional gas extraction. The unconventional gas industry are struggling with how to develop commercially viable gas fields that do not need a big surface footprint. In Annex B of the Government SEA report linked to the 14th Licencing Plan Area 3 contains the MWJP Plan area and clearly states 'the presence of internationally, nationally and locally protected areas across SEA Area 3 suggests that considerable care will be required in locating potential test and operational sites.'

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
113 Howardian Hills AONB	1595	2.74		Unclear as to what the 'significant differences between the two designations in terms of local policies and constraints that may apply' are, in relation to the NYMNP an HHAONB. Both are national designations covered by paragraphs in the NPPF and these policies are not overridden by anything contained in Local Plan policies or other documents. There may be some differences, but they are not 'significant'.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1436	2.75		AWRP does not utilise its outputs fully for local businesses, through heat generation, therefore suggesting it is unsuitable.
295 Northumbrian Water Ltd	0890	2.76		Supports the recognition of waste water as a main waste stream and the objective of delivering sustainable waste management.
3006	2223	2.77		There is no reference in this section to any projected figures for waste arising from unconventional gas extraction, and how and where it will be dealt with. There could be large volumes of hazardous waste water for which there is currently no process which will entirely decontaminate it. Currently industry is beginning to re-use the waste water from one hydraulic fracturing as part of the water required for the next fracturing operation but problems of intensifying contamination with each re-use have not been assessed. Industry is also looking at 'dry' fracturing using high pressure air rather than water as the basic agent, but untried with unknown waste/pollution implications. The solutions are dependant on advances in technology. These are waste issues that the Joint Plan must deal with.
2990	1920	2.79		Agree with the aim to reduce landfill and encourage recycling.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1437	2.81		Current and projected waste volumes are not expressed with great certainty throughout the document. Incineration of waste is outdated and retrograde.  AWRP is too large, based on over-estimates of rate of growth in LACW, is not based on up-to-date policies. AWRP will have an unacceptable impact upon the local community and therefore demonstrates the three WPAs are not meeting their aim.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1438	2.82		The Plan is meaningless if it cannot 'specify how waste is to be managed or the processes and technologies by which it must be managed'.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1439	2.84		It is very worrying the 'limited evidence' of imported/exported waste, as this is crucial to the combined authorities ability to make right decisions in regard to volumes and capacity of waste.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1563	2.85		The Waste Spatial Map should include underlying aquifers as these are significant constraints to waste development. These features and their special effect need to be clearly understood.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1440	2.86		AWRP is counter to the objective of managing waste in proximity to where it arises.
121 Environment Agency	1278	2.87		'unlicensed facilities' may be better described as 'facilities which are not controlled by an Environment Agency permit'
118 East Riding of Yorkshire Council	1685	2.89		East Riding is the second largest destination for waste exported from North Yorkshire, exporting less to NYCC (less than 15,000t) than it receives (between 45 - 60,000t). A key factor in this is the lack of major roads between the two counties especially from the north (notable exceptions being the A165), and therefore the impact on the minor road network. Figure 9 does not show the A166 and A1079 from York to ERY.
231	2138	2.93		The Plan should provide more facts about AWRP.
1033 CTC North Yorkshire	2249	2.93-2.9		Have a number of concerns about the AWRP project since it may prove to be less relevant to developing strategies for the region.
968 Womersley Parish Council	0732	2.95		Planning should have a strategic role in assessing the disposal of waste and availability of options for disposal utilising voids in existing quarries that would otherwise have to import waste to complete restoration.
2990	1921	2.95		Whilst it is accepted that an LPA cannot dictate how a private business operates, the MWJP should make provision for encouraging parties to work together for mutual benefit and for the betterment of the environment.
3005	1872	2.95		There is little evidence in the plan of a strategic view being taken across minerals and waste management from the perspective of using colliery spoil to fill quarry voids, rather than having to import products to fill them. This would allow waste to be moved up the hierarchy.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2954 ***Do Not Consult*** 2953***	1934	2.95		Planning should have a strategic role in assessing the disposal of waste and the availability of options for disposal utilising voids in existing quarries that would otherwise have to import waste to complete restoration.
2953	1960	2.95		Planning should have a strategic role in assessing the disposal of waste and the availability of options for disposal utilising voids in existing quarries that would otherwise have to import waste to complete restoration.
2956 ***Do Not Consult*** 2953***	1975	2.95		Planning should have a strategic role in assessing the disposal of waste and the availability of options for disposal utilising voids in existing quarries that would otherwise have to import waste to complete restoration.
2955 ***Do Not Consult*** 2953***	1946	2.95		Planning should have a strategic role in assessing the disposal of waste and the availability of options for disposal utilising voids in existing quarries that would otherwise have to import waste to complete restoration.
3006	2224	2.95		The Plan does not consider the use of natural resources for unconventional gas extraction, especially water use, currently estimated at 10,000 to 25,000 cubic metres per single well hydraulic fracturing. There is an overlap between MPAs and the water companies especially as the local aquifers which underlie most of the region are over abstracted already. The MPA must look at questions of commercial pressure on a vital resource.
1033 CTC North Yorkshire	2248	2.95-2.9		Pleased to see the authorities recognise the links between mineral and waste development and the plan will be a balance between providing maximum environment/community benefits and minimising harmful impacts.
121 Environment Agency	1279	2.96		Support inclusion of this paragraph which highlights the potential for both minerals and waste sites to provide environmental benefits during operation and after use.
3005	1873	2.97		Robust methods at the scoping and Environmental Impact Assessment stage must be adopted, particularly where there are risks to health and wellbeing. Using the precautionary principle where there are risks to health. Ensuring that harmful impacts are minimised can only be done through the prudent use of measurable and enforceable conditions which can be effectively and stringently imposed. Sufficient resources are required to ensure this happens.
2990	1922	2.97		Seriously consider the impact of MWJP policies on the environment. To minimise harmful impacts robust enforcement of planning conditions is needed, and an enforcement department capable of proper action is required rather than assuming another agency will deal with the issue.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2225	2.97		<p>The Plan should note that the potential scale of unconventional gas extraction along with the risks involved with using fracking will make it difficult to balance 'the potential for adverse affects' 'while ensuring that any harmful impacts are minimised through appropriate locations, design and operation.'</p> <p>The MPAs should research and decide on clear policy criteria re appropriate locations, design and operations for unconventional gas extraction.</p> <p>The MPAs should research the scale and precise nature of potential harmful impacts from unconventional gas extraction and draw up a list of impacts that are likely to be beyond mitigation.</p>

**Section: 003: Issues and Challenges**

**Chapter: 3**

**Policy No:**

3006	2226	3.03		<p>Third Bullet point - There is not enough factual and technical evidence about shale gas, CBM and underground gasification in the evidence base on which to base sound strategic and regulatory decisions for the Plan area</p> <p>The scale and severity of impacts balanced against potential economic benefits are questionable, so the MPAs should do their homework before making decisions.</p>
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734	Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1441	3.04	Has the evidence, provided to demonstrate AWRP is a flawed proposal, been utilised?
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3006		2227	3.05	<p>Forth bullet point - 'considering how to address the potential for unconventional gas and oil...' is too weak and vague, there needs to be a better grasp of the issues associated with unconventional gas development.</p> <p>Suggest setting up a working party to gather together the issues on the basis of sound factual and technical evidence.</p>
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2781	Cromwell Wood Estate Co Ltd	1648	3.05	Minerals - Bullet point 6 - add ' whilst acknowledging the variability of the specification of the product.'
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1461	Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1564	3.05	General issues Section, Bullet point 2. The text provides a number of important assets that require an appropriate approach to their protection and should be included in this list.
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Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1022 Constructive Individuals	0183	3.05		"addressing the potential" for shale gas- has already been consulted upon and the response was that fracking should not be permitted. This strongly-held public view should form the basis of policy.
1140 Sibelco	1694	3.05		2nd Bullet point - insert the words 'where possible' after the word 'but'. The European Parliament is clear on the fact 'Natura 2000 areas do not a priori prohibit mineral extraction'. This section needs to reflect the national importance of silica sand and it is distinct from aggregate minerals. The sentence should now read ' Maintaining the required land banks for sand and gravel, crushed rock. Silica sand and clay, but where possible providing for these outside of the National Park and AONBs.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1442	3.05		Within the Waste Summary - 'incorporating flexibility' should be used in the AWRP proposal to ensure it is critically analysed.
1355	2165	Q01		The key issues are being addressed.
2841 Scarborough, Whitby and Ryedale Green Party	0189	Q01		Yes
119 Natural England	0902	Q01		Welcomes the recognition given to protecting and enhancing landscape designation (National Parks, AONBs) SSSIs (incorrectly referred to as a Site of Special Scientific Importance), nature reserves and other non designated sites. SACs and SPAs and Ramsars should also be identified.  In accordance with the NPPF and Environment White Paper, the Plan should ensure that in addition to the sites themselves, the connection between them are protected and enhanced.

157	0126	Q01	<p>The key issues covered for waste are incorrect and incomplete.</p> <p>The MWJP ignores the need to act responsibly with public money and it is essential that the key issues include cost minimisation, value for money and minimising financial risk.</p> <p>'providing additional capacity' should not be a key issue as there is excess waste management capacity in the UK and Europe.</p> <p>'Minimising greenhouse gas emissions' should be addressed as a key issue.</p> <p>There is no need for 'safeguarding strategically important waste management infrastructure' as a key issue. There is sufficient capacity in the UK already.</p> <p>Minimising transport mileage should be considered as a key issue. The county should not be considered as a 'closed box' waste produced in the north could be taken to Teesside.</p> <p>Four other key issues to add; sustainability; minimising adverse effects on local communities; minimising adverse effects of human health and minimising adverse effects on the environment.</p> <p>While flexibility and moving waste up the waste hierarchy are key issues, it should be recognised that incineration would make the plan inflexible and place limits on the amount of recycling that can take place.</p>	
1174	2070	Q01	<p>There is no mention of the long term effects on the historic landscape, landscape and agriculture. The Plan is identifying key issues but not giving them appropriate priority. The term 'long term' needs to be set against thousands of years of continuous agricultural use and future potential as well as the historic and aesthetic values of the landscape.</p> <p>Refer to EIA regulations advice on 'long term'.</p> <p>Sustainable development also refers to 'in the long term'</p>	
3006	2228	Q01	<p>These are key issues, more needs to said about unconventional gas.</p>	
1135	Lightwater Quarries Ltd	0936	Q01	<p>Agree with the range of issues identified.</p>

120 English Heritage

0289

Q01

The key issues and challenges which are set out in paragraph 3.5 are the main ones the plan needs to address in terms of historic environment. Particularly endorse the following

#### Minerals

- Third bullet-point - the plan needs to ensure that there is a steady supply of building and roofing stone. Stone buildings reflect local geology, imparting local distinctiveness to historic towns, villages and rural landscapes. If the character of these buildings and areas are to be maintained supplies of new matching stone are needed for repair and for new construction.
- Seventh bullet-point - Building stone is an important mineral resource in the Joint Plan area so there is a need to ensure that sources of building stone are not sterilized by other uses.
- Eighth bullet-point - The Joint Plan needs to include sufficient safeguards to minimize the adverse impacts of mineral extraction upon the environment. The scale of future mineral provision and, in particular, the locations identified for future minerals development, need to be based on a robust assessment of the likely impacts they might have upon the environmental assets of this part of North Yorkshire.
- Ninth bullet-point - the after use strategy needs to be delivered in a manner which will best safeguard the historic environment. Consequently there is a need for a strategic approach to restoration with the Plan setting out effective co-ordinated after use strategy.

#### Waste

- Sixth bullet-point - The Joint Plan needs to ensure that there are sufficient safeguards in place to minimise the adverse impacts of waste management upon the environment. The strategy for waste management and , in particular, the locations identified for future waste developments, need to be based upon a robust assessment of the likely impacts they might have upon the environmental assets of this part of North Yorkshire.

#### General

- Second bullet-point - It is essential that the Plan provides an appropriate framework for the protection and enhancement of the important landscapes and environmental assets of the area. These help to give the area its distinct identity as well as contributing to the quality of life and its communities and to its economic well being. The Plans strategy must ensure that the assessed development needs for mineral and waste developments are delivered in a way which will not harm this resource.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1033 CTC North Yorkshire	2246	Q01		<ul style="list-style-type: none"> <li>-The issues and challenges should relate only to sustainable growth, and not growth for its own sake.</li> <li>- Some concern about new potash mine in NYMNPA but recognise the Plan should address this rigorously.</li> <li>- Agree the need to address potential for unconventional oil/gas resources</li> <li>-Welcome the pursuit of appropriate approach to protection of important landscapes.</li> <li>- Need to emphasise use of most environmentally friendly transport modes to move material in bulk.</li> </ul>
2609 York Environment Forum	2195	Q01		<p>Minerals Key issues;</p> <p>4th Bullet point 'considering how to address the potential for unconventional oil and gas resources such as shale gas'. Fossil fuels should remain in the ground to minimise carbon emissions. Therefore, we do not consider there is potential for exploiting unconventional oil and gas. Apart from the above, the key issues presented are substantive specific issues, but there are wider issues to be addressed.</p>
1112 RSPB North	1712	Q01		<p>Support the key issues and challenges the Joint Plan addresses.</p> <p>In bullet point 'providing for a range of enhancements, particularly through reclamation of workings.' specific reference should be made to providing a net-gain in biodiversity through the landscape-scale creation of priority habitat. This is because the minerals industry can help to stop and reverse the decline in biodiversity.</p> <p>Mineral site restoration has potential to deliver habitat creation targets, the habitat creation needs to be carried out at a landscape scale for the habitats to be viable in the long term. Providing a net gain in biodiversity is also a requirement of the NPPF.</p> <p>In the bullet point 'Sites of Special Scientific Importance' is not correct, it should be 'Sites of Special Scientific Interest', this bullet point should also refer to international nature conservation designations such as SPAs, SCAs, SINCs and Habitats and species of Principle Importance.</p>
1140 Sibelco	1695	Q01		<p>This section needs to reflect the national importance of silica sand and it is distinct from aggregate minerals.</p>
250 Dart Energy (Europe) Ltd	0839	Q01		<p>Support the consideration of the potential for unconventional oil and gas resources such as shale gas, as well as planning for conventional forms of energy mineral.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
215	1886	Q01		No. The issues considered are incomplete. A main issue that should be considered is the impact on the environment and especially climate change. Incorporating AWRP into the MWJP does not make efficient use of public money. Government has recognised that AWRP is not needed as it cancelled the PFI.
422	Bilton-in-Ainsty with Bickerton Parish Council	0707	Q01	A key waste issue has been overlooked, there is no need to provide additional waste management capacity when the UK and Europe already has an over capacity. Waste should not be incinerated, there should be improved recycling. The principle of centralised transportation of waste is wrong, it should be disposed of where created as reduces greenhouse gases and is more environmentally beneficial. Should compare alternative schemes to identify best value for money. The starting point appears to be incineration at any cost.
115	Minerals Products Association	1047	Q01	Broadly agree with the key issues, but have some caveats. Where states 'Maintaining the required land banks for sand and gravel, crushed rock, silica sand and clay, but providing for these outside of the National Park and AONBs' should have 'as far as practicable' in the case of National Parks and AONBs. Where states 'Providing for a range of enhancements, particularly through reclamation of workings' reference should be made to the value mineral workings may have for mitigating the effects of climate change and enhancing ecological services.
121	Environment Agency	1281	Q01	Pleased to see that moving waste up the waste hierarchy is identified as a key issue and challenge for waste management in the plan area. Strongly support this position.
1577	Lafarge Tarmac	0952	Q01	Broadly agrees with these key issues.  The second bullet point under Minerals, which reads '...providing for these outside of the National Park and AONBs' should be qualified with the addition of 'as far as practicable' to correctly reflect para 144 of the NPPF.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2197 CPRE (Harrogate)	1061	Q01		<p>Issues identified are appropriate for the plan period, the issues discussed in workshops and other consultations have successfully come forward in this document.</p> <p>Waste issues have been well illustrated and addressed. Uncertainty of AWRP viability still remains and whether it will be the best value for money. There are other more serviceable waste sites available. Zero waste is unachievable, recycling has increased. Existing waste sites are well located.</p> <p>Concern that surface water from new developments allowed to run into sewerage drains.</p> <p>Welcome use of landfill in land restoration, loss of land is a major consideration.</p>
116 Ryedale District Council	1163	Q01		<p>It is considered that the scope of the Issues and Challenges are appropriate and relevant for the Plan.</p>
171 North Yorkshire Waste Action Group (NYWAG)	1013	Q01		<p>Waste issues are incorrect and incomplete.</p> <ul style="list-style-type: none"> <li>- Add minimising greenhouse gas emissions to key issues.</li> <li>- Cost minimisation and good value for money should be added to key issues.</li> <li>- Providing additional capacity is not a key issue as excess capacity in the UK and Europe. AWRP should not be compared with a 'no nothing' scenario, it should be compared with at least two other options.</li> <li>- No need for safeguarding 'strategic waste management infrastructure' to be treated as a key issue.</li> <li>- Should not just deal with waste within the Plan area, could export it.</li> <li>- Sustainability along with minimising adverse effects on local communities, human health and the environment should be a key issue and it must be recognised that this precludes incineration.</li> <li>- Agree with key issues of flexibility and moving waste up the hierarchy, incineration has the opposite effect.</li> </ul>
1157 W Clifford Watts & Co Ltd	0611	Q01		<p>Concerned about the fact that although one of the key issues for minerals is maintaining landbanks for sand and gravel, crushed rock, silica sand and clay, provision for the landbanks is only for locations outside the National Parks and AONBs. The company own a proposed site which is located within the North York Moors National Park. The site is currently inactive but hope to gain planning permission and will produce crushed rock and building stone. Support should be given to existing minerals workings in the North York Moors National Park in order to maximise the sustainable use of reserves.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
585 Green Hammerton Parish Council	0502	Q01		No. The key waste issues are incorrect and incomplete. Providing additional capacity is not a key issue in light of UK and European excess waste management capacity. Safeguarding 'strategic waste management infrastructure' is not a key issue. Agrees with the key issues of flexibility and moving waste up the waste hierarchy but not incineration even for electricity generation.
585 Green Hammerton Parish Council	0507	Q02		The following should be added: Minimising carbon and greenhouse emissions. Minimising transport mileage (proximity principle). Cost- value for money.
252 York Potash	1040	Q02		The key issues should include the need to provide a secure and steady supply of industrial minerals that occur in the Plan area. Potash is defined as a nationally important mineral in the NPPF and NPPG and in Core Policy E of the NYMNPA Core Strategy and Development Policies document. This should be carried forward into the MWJP.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1174	2071	Q02		<p>A key issue for the joint plan is long term sustainability. Concerned that if all the surface mineral resources were extracted over time a large part of the Southern Magnesian Limestone Landscape Character Area as well as the Vale of Mowbray and some of the Vale of York would be changed to wetland. Need to consider if this mineral needs to be extracted at all.</p> <p>The MLC report Stage 4 recommendation for planning states that restoration to agriculture will only be considered if extraction is limited to above the water table and sufficient overburden is present to create suitable terrain for agriculture, but such end uses are unlikely to generate as wide a range of ecosystem service benefits as those relating to nature conservation. Need to be cautious with this approach especially in areas such as Thornborough.</p> <p>Use of marine aggregate should be included as a key issue, this is supported by the URS Marine Aggregates Study January 2014. Increasing marine aggregates makes sense, particularly to prevent further loss of agricultural land, which includes landscape, way of life, heritage and all that those entail. It also has the effect of increasing landmass. Another key issue to include is reducing flooding and 'enhancing 'nature conservation through extraction in the Ure/Swale interfluvium. In the Vale of Mowbray and Vale of York areas mineral is to be extracted for the benefits of other communities and a restoration aim is for nature conservation and flood alleviation, which will lead to a high loss of agricultural land use as well as landscape character. Can compare the area to the Somerset Levels and Moors which is now going to be protected against unacceptable flooding, but the Vale of Mowbray and Vale of York area not. If a quarry is restored to a wet after use and used for flood alleviation then this could have a devastating effect on wildlife, this should be taken into consideration when deciding whether to allow extraction.</p>
120 English Heritage	0290	Q02		<p>Consideration should be given to how the Plan can reduce the amounts of construction and demolition waste generated within North Yorkshire. The Joint Plan needs to explore to what extent it can persuade lower-tier Authorities to include appropriate policies to encourage reuse of existing buildings (rather than simply allowing them to be demolished and the materials recycled).</p>
115 Minerals Products Association	1464	Q02		<p>Have covered the relevant issues.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
215	1887	Q02		Waste treatment should be progressively moved up the waste hierarchy, incineration without heat capture would not do this. Waste management should be coordinated across neighbouring Local Authorities to maximise the use of existing facilities and minimise the duplication of effort and so reduce costs.
2253	2086	Q02		Include restricting the exploration and production of fossil fuels so as to address the causes and effects of climate change. According to the parliamentary committee on Climate Change, the new 'dash for gas' would be incompatible with meeting mandatory carbon budgets.
3006	2229	Q02		Additional strategic issues - a re-researched and reformulated approach to unconventional gas, alternative wording could be 'Consider in detail how to address the potential benefits, harmful impacts and possible regulation of unconventional gas and oil development.' A detailed discussion of these issues does not appear in the further chapters and sections of the Plan or in the evidence papers.
2841 Scarborough, Whitby and Ryedale Green Party	0190	Q02		Protection of water supplies and of agricultural land are important as they are needed for our survival.
1135 Lightwater Quarries Ltd	0937	Q02		Propose additional key issues under the minerals heading - Include policies to encourage the prior extraction of minerals where practical and environmentally feasible when non mineral developments are envisaged in MSA. - Ensure that the landbank is not bound up in any one large site or company to stifle competition - Ensure that developers make the most possible use of the extracted minerals through the use of appropriate processing technology. Under waste or general matters recognition should be made of how waste materials can be used as a recovery activity in the provision of sustainable restoration scheme of mineral workings.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1713	Q02		<p>The 'general' issues should include a requirement for all minerals and waste development to deliver a net-gain in biodiversity, this would be consistent with the NPPF.</p> <p>The Plan should promote a restoration-led approach following the best practice demonstrated by Surrey and Worcestershire County Councils. The restoration-led approach should have particular emphasis on biodiversity as in the Nottinghamshire Minerals Local Plan.</p> <p>The restoration-led approach should:</p> <ul style="list-style-type: none"> <li>- Focus on delivery of strategic restoration objectives rather than allowing piecemeal restoration schemes</li> <li>- Drive minerals development to locations where the working of viable mineral resources will enable the delivery of these strategic restoration objectives, including the landscape-scale creation of priority habitat.</li> <li>- Target the end use of the site from the beginning of the planning process.</li> </ul> <p>The Worcester Minerals Local Plan considers 200ha as being the minimum scale at which strategic restoration objectives can be delivered and requires Areas of Search to be at least this size. The RSPB recommends that the Joint Plan takes a similar approach.</p>
2609 York Environment Forum	2196	Q02		<p>Additional strategic issues that should be considered are:</p> <p>The sustainable use of precious and finite resources, both mined and arising from waste, need to take place within a circular economy model. This would create a more holistic and sustainable model that would impact positively on the economy and environment and provide security for the future.</p> <p>The plan should include an overarching strategy for a progressive reduction in greenhouse gas emissions from minerals and waste activities.</p>
2779 Pickering Civic Society	0032	Q02		<p>The Plan needs to address the strategic issue of onshore unconventional gas exploration by fracking, which is likely to be subject to pressure from the highest level to be approved.</p>
422 Bilton-in-Ainsty with Bickerton Parish Council	0708	Q02		<p>There is no evidence that NYCC proposals have sought independent verification of the projections used for population growth or waste volumes.</p>





Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
74 Selby District Council	1305			<p>Vision and objectives are well thought through and reflective of both national and local priorities. Support the zero-waste initiative and increased capacity in HWRCs, e.g. in Sherburn-in-Elmet, where necessary facilities for both existing and proposed housing over the SDC LP period need to be provided. This would contribute to meeting national and local recycling and diversion from landfill targets. Supports the principle of dealing with waste at source.</p> <p>Support the objectives. Objective 8 is in conformity with the adopted SDC LP, which promotes the use of the former Gascoigne Wood Mine, where the use of the existing rail infrastructure would be required. However, adopted policy SP13 provides support for only limited re-use of the infrastructure of the former coal mine.</p>
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1566			<p>Objective 2: the plan should consider appropriate management for waste arising outside the plan area and reflect the requirements of the duty to co-operate, not just with each other but also authorities outside the plan area.</p> <p>Objectives 6 and 7: there should not be a presumption in favour of using existing mineral working sites as locations for reuse and/ or recycling of construction, demolition and excavation waste.</p>
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1565			<p>Paragraph i. of the draft vision should properly reflect that the authorities have a duty to co-operate not just with each other, but with authorities outside the plan area. The first sentence appears to restrict its effect only to waste arising within the plan area. Similarly the third sentence only considers the possibility of waste being exported out of the plan area. The potential for waste arising outside the plan area should be assessed, quantified and a suitable approach to its management proposed. To be a truly sustainable vision, and for the plan to engender sufficient flexibility, the vision should include the approach to management of waste arising from outside the Plan area.</p> <p>Paragraph iii. The approach in the vision to provide a presumption in favour for the use of existing mineral workings as locations for reuse and/or recycling of CDEW is wrong and does not reflect the specific locational requirements of some mineral working locations. There is no justification for this . These proposals must be appropriately located and justified in their own right. This should not be carried forward in the vision and that these types of development will be considered following the normal development management procedures.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2781 Cromwell Wood Estate Co Ltd	1649	4.02		Point I - in the case of inert or excavation waste recognise that the land filling of excavation waste into the void space in quarries to provide a restored site is really recovery of waste and not disposal.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1443	Q03		AWRP is not in keeping with the vision presented, especially 'attention to a careful balance' or 'protecting and enhancing the environment'.
231	2139	Q03		Would welcome the inclusion of waste minimisation and also an aspiration to reduce greenhouse gas and other emissions from minerals extraction and waste management in the MWJP area.
1112 RSPB North	1714	Q03		Support aspirations of the draft vision, but it should go further in terms of delivering strategic restoration objectives, including the landscape-scale creation of priority habitat. Additional suggested wording for the vision is - A restoration led approach to the location, operation and restoration of mineral development will have resulted in the delivery of strategic restoration objectives. - Minerals development will have made a significant contribution to delivering a net-gain in biodiversity - and establishing a coherent and resilient ecological network - primarily through the landscape-scale creation of priority habitat.
1135 Lightwater Quarries Ltd	0938	Q03		Agree with themes expressed in the vision. Point ii of the vision should be amended to include reference to mineral developers making best possible use of the extracted mineral and not just extracting for bulk fill specifications and other low specification uses. Minerals can only be worked where they are found and so not always located near to development centres, access to transport infrastructure is key to achieving long term objectives on carbon emissions and climate change.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1444	Q03		The aim to provide a sufficient waste capacity to meet needs is in contrast to the evidence that there may be an over-capacity, with a need to import waste to sustain AWRP.
969 Wykeham Parish Council	1401	Q03		The Vision should make clear that the Objectives, whilst admirable, may sometimes conflict with each other. At times the national interest and economy will be best served by allowing mineral working and this may override other objectives. It is essential that continuation and diversity of supply is maintained and competition is encouraged.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1280	Q03		Para iii - would like to see 'environmental' considerations added to the paragraph, e.g. 'where geological, environmental and infrastructure considerations allow...' Para vii and viii - support inclusion of these paragraphs.
1153 NYCC Highways	2406	Q03		Support vision set out in Local Plan
2753 Friends of the Earth - Yorkshire & Humber and the North East	1757	Q03		Support the Vision.  In particular section viii.
2800	0027	Q03		Fracking in North Yorkshire would pose a number of threats and not fit with the Vision and objectives "protecting and enhancing the environment, supporting communities and businesses and mitigating and adapting to climate change".
2197 CPRE (Harrogate)	1062	Q03		Vision relating to zero waste optimistic. Need new reclamation sites within the plan area and encourage use of secondary minerals. Safeguarding of minerals for the future is important. Point v. - waste needs to be treated close to areas generating the waste, opportunities for farms to house anaerobic digesters near to towns and cities. Point viii - welcome this statement as is essential to the sustainability of the plan, need to reclaim and recycle waste material.
1033 CTC North Yorkshire	2250	Q03		The priorities listed and draft vision are broadly supported.
2253	2087	Q03		Necessary for the future.
120 English Heritage	0291	Q03		Support the proposed vision, especially - The intention that the need for minerals and waste developments will be balanced against the protection and enhancement of the Joint Plan area's environment. The environmental assets make an important contribution to the character of this part of Yorkshire, to the areas economic well-being, and to quality of life of its communities. It is important, therefore, that the strategy for minerals and waste developments is delivered in a way which safeguards these assets. - The intention to make provision for local materials to help maintain and improve the quality of the area's built environment. North Yorkshire's rich architectural heritage owes much to the great variety of stones used in buildings and other structures and the Joint Plan area has, historically, been a supplier of building stone not just for the local area but also elsewhere across the Country.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
585 Green Hammerton Parish Council	0508	Q03		the beneficial conclusion of the Sustainability Appraisal is one based on theory. The actual proposal of AWRP does not have a positive effect on landscape, climate change, the economy and protecting communities and potentially strong positive impacts identified in relation to minimising the use of resources, managing waste more sustainably and mitigating climate change.
119 Natural England	0903	Q03		The vision would benefit from specific reference in part vi to protecting and enhancing the network of nature conservation sites and priority habitats. Clearer reference to protecting sites and habitats would score more positively against Objective 1 within the SA.
1355	2166	Q03		The draft vision presented gives direction to the policies put forward.
422 Bilton-in-Ainsty with Bickerton Parish Council	0709	Q03		The Sustainability Appraisal presupposes that the AWRP scheme is the best way forward and is therefore flawed. Other schemes could reduce the impact on the landscape and environment and reduce climate change.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1445	Q03		If AWRP accepts waste from the Plan area the aim to 'minimise overall distance waste and minerals are transported' will not be met. AWRP does not meet the objective to 'manage waste as near to where it arises as possible' or 'new facilities will be co-located with complementary uses' or 'natural, historic and cultural environments... will have been protected'.
2236 Amey Cespa Ltd (Allerton Waste Recovery Park)	1262	Q03		Agree with the statement 'important waste management infrastructure will have been safeguarded for the future'.
2841 Scarborough, Whitby and Ryedale Green Party	0191	Q03		Support the vision especially vii.
128 Yorkshire Wildlife Trust	0745	Q03		The vision for reclamation and restoration should include the aim of appropriate restoration of mineral sites in order to connect up habitat for wildlife and enhance biodiversity. This would be consistent with the NPPF. Tables showing potential for restoration of mineral sites which are close to the Yorkshire Wildlife Trust's Living Landscapes are included with this response.
252 York Potash	1041	Q03		The Vision should recognise the national importance of the potash reserves and economic contribution which minerals can make to the economy.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1174	2072	Q03		<p>There is a failure to give due consideration to the value of agricultural land, particularly when added to other ecosystem services.</p> <p>Reducing the carbon footprint does not mean in the short term, it must take all into consideration, the ecosystem approach.</p> <p>References to evidence documents are provided to support the protection of agricultural land including</p> <p>The future of Food and Farming (2011)</p> <p>Intergovernmental Panel on Climate Change 2014: Impacts, Adaptation and Vulnerability.</p> <p>Land Use Futures: making the most of land in the 21st century 2010</p> <p>Natural England Advice on Farmland</p> <p>A joint position from European Landowners' Organisation and Bird Life International.</p> <p>The Natural Choice: Securing the Value of Nature</p> <p>Natural England Technical Information Note TIN049</p>
112	Highways Agency	0411	Q03	<p>Supports the vision particularly Parts i and ii which seek to safeguard infrastructure for minerals and waste developments. This could be strengthened by listing the infrastructure, such as railheads, wharves and pipelines, specifically within the vision.</p> <p>Supports part iv. It could be strengthened further by stating a modal shift to sustainable methods of transport such as rail or water.</p> <p>Particularly supportive of the end of part iv and part v as these would help reduce the amount of traffic associated with minerals and development on the road network (SRN), and would therefore help to both reduce congestion and ensure a safe and efficient network is maintained.</p>
171	North Yorkshire Waste Action Group (NYWAG)	1015	Q03	<p>The sustainability appraisal conclusion is only based on the theory of the vision and ignores AWRP.</p> <p>AWRP does not have a positive effect on the landscape, mitigating climate change, the economy and protecting communities. It is negative in relation to minimising the use of resources and managing waste more sustainably.</p>
94	Craven District Council	2304	Q03	<p>Support the vision set out and believes it follows the principles of sustainable development and is comprehensive.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
157	0128	Q03		The conclusion of the SA of the vision is based only on theory of the vision and wholly inadequate. If it had been done correctly it would (taking account of the AWRP) have identified negative impacts upon landscape, economy and protecting communities. AWRP would have a negative effect on minimising the use of resources, managing waste more sustainable and mitigating climate change.
3006	2230	Q03		Vision is acceptable, however it is apparent that development of unconventional gas will not fit within the spirit of this vision, and only with the most rigorous regulation and limitation can it be made to conform to the letter of this vision.
2970	Frack Free York	2355	Q04	The Vision should include reducing dependence on fossil fuels and limiting their extraction due to their impact upon climate change and not being a sustainable form of energy. Leaving fossil fuels in the ground is the surest way of mitigating climate change.
171	North Yorkshire Waste Action Group (NYWAG)	1016	Q04	Need to implement the vision and sustainability objectives and reassess AWRP. This would lead to AWRP being cancelled.
157		0129	Q04	An alternative option would be to set aside AWRP and implement the plan based on the vision and objectives identified.
1112	RSPB North	1715	Q04	Support aspirations of the draft vision, but it should go further in terms of delivering strategic restoration objectives, including the landscape-scale creation of priority habitat. Additional suggested wording for the vision is - A restoration led approach to the location, operation and restoration of mineral development will have resulted in the delivery of strategic restoration objectives. - Minerals development will have made a significant contribution to delivering a net-gain in biodiversity - and establishing a coherent and resilient ecological network - primarily through the landscape-scale creation of priority habitat.
422	Bilton-in-Ainsty with Bickerton Parish Council	0710	Q04	If answer to Q3 is accepted then AWRP should be assessed
1174		2073	Q04	Yes, long term sustainability. Liaison with communities will be key to delivering the Vision.
94	Craven District Council	2305	Q04	Support the vision set out and there is no need for an alternative.
585	Green Hammerton Parish Council	0509	Q04	Actually implement the proposed vision and objectives and reassess AWRP in light of these objectives and vision.
215		1888	Q04	The vision as far as it goes is acceptable. The inclusion of AWRP in the vision is unacceptable as it mitigates against many of the visions goals.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2231	Q04		The vision would be stronger and more in keeping with the growing urgency of climate change if it committed itself to at least a wish to work towards the restriction of fossil fuels.
120 English Heritage	0292	Q04		<p>In terms of amendments to the suggested vision consideration should be given to the following</p> <ul style="list-style-type: none"> <li>- Criterion iii - in trying to identify a good match between locations of minerals supply and demand account should be taken of environmental factors. For example there is a large demand for aggregates from the area lying outside and to the north of the Plan area. However, the northern part of the Joint Plan area contains not only a National Park but also some very important archaeological landscapes. It is suggested that Criterion iii is amended as follows "Where geological, environmental and infrastructure considerations allow, opportunities to ensure..."</li> <li>- Criterion vi - In view of the fact that the World Heritage site at Fountains Abbey/Studley Royal is recognised as being of international importance and is, clearly, one of the 'special' landscapes of the Joint Plan area, reference should be made to it within this Criterion. It is suggested that the end of Criterion vi is amended along the following lines "...North York Moors National Park, the historic City of York and the World Heritage Site at Fountains Abbey/Studley Royal"</li> </ul>
2970 Frack Free York	2307	Q05		The development of unconventional gas production would compromise Objectives 9, 10 and 11 as these include commitments to protect natural and historic environments, landscapes and tranquil areas, local communities, businesses and visitors from impacts of minerals and waste development whilst addressing the causes and effects of climate change relating to minerals and waste development.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
201	1896	Q05		One of the draft objectives states 'Planning for waste management capacity needed to manage waste arising's within the area. Clarification is needed about what the 'area' is, and confirm the Plan is looking outside the North Yorkshire boundaries to ensure facilities for waste management in neighbouring areas can be used to reduce cost. With regard to optimising distribution of minerals and waste, the largest population centres are York and Scarborough, their waste should be treated within the councils' constituency boundary. The wording that there needs to be a 'good match' is meaningless, this should be clarified. Waste should be dealt with where it arises. The sentence 'Protecting the natural and historic environment, landscape and tranquil areas of the Joint Plan area' is vague and meaningless. All areas apart from urban areas of York, Scarborough and Harrogate are natural, historic and tranquil. The agricultural areas of the Vale of York and Vale of Mowbray need protection from fracking and other forms of industrialisation caused by minerals extraction and waste management.
3021	1967	Q05		Agree with Objective 5
2197	CPRE (Harrogate)	1064	Q05	Agree with content of the objectives and feel they are very comprehensive.
2841	Scarborough, Whitby and Ryedale Green Party	0192	Q05	Objective 4 - care needs to be taken when extracting marine aggregates as there could be severe damage to life in that area of the sea. Objectives 7 and 8 - strongly support having operations close to supply and markets and reducing the use of transport and seeking more sustainable methods. Strongly support objectives 9 and 10 Take note of the sustainability appraisal and if possible modify the relevant objectives. The growth objective cannot be fully compatible with the sustainability objective, and the latter should take priority.
231		2140	Q05	Would welcome the inclusion of waste minimisation and also an aspiration to reduce greenhouse gas and other emissions from minerals extraction and waste management in the MWJP area.
128	Yorkshire Wildlife Trust	0746	Q05	Support objectives 9, 11 and 12. The potential value of restored mineral sites for biodiversity and the possibility to connect up habitat could be further emphasised or references or examples provided.
1153	NYCC Highways	2407	Q05	Support objectives set out in Local Plan



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
422 Bilton-in-Ainsty with Bickerton Parish Council	0711	Q05		The AWRP approach shows that many of the objectives cannot be met, incineration cannot be used to meet the objectives. Managing waste over several sites nearer to the point of production would reduce transport and greenhouse gases.
215	1889	Q05		AWRP does not support the objectives, it has a damaging effect on the landscape, will pollute the atmosphere and not move waste up the waste hierarchy.
116 Ryedale District Council	1221	Q05		The Vision and Objectives are appropriate. Support is given to Objectives 1,4,5,6,7,8,9,11 and 12.
121 Environment Agency	1282	Q05		Support all of the objectives, they comprehensively cover all the relevant aspects on minerals and waste management. Strongly support objectives 1,9, 11 and 12.
119 Natural England	0904	Q05		Objective 9 should refer to protecting and enhancing the network of internationally, nationally and locally designated nature conservation sites. This would also score more positively against SA objective 1.
1355	2167	Q05		The objectives cover the main points.
2236 Amey Cespa Ltd (Allerton Waste Recovery Park)	1264	Q05		To deliver the Objectives, and specifically Objective 6, it is necessary to allocate AWRP as a Strategic Site.
2865 Zurich Assurance Ltd	1584	Q05		Objective 10 should mention the opportunities for long term gains in quality of life and the economy from mineral workings.
585 Green Hammerton Parish Council	0510	Q05		Some of the objectives (Objectives 1,7,9 and 11) do not support AWRP.
1135 Lightwater Quarries Ltd	0939	Q05		Objective 1 - Should recognise the recovery aspect of the restoration of mineral workings. Objective 4 - Could be modified to make reference to the best possible use of extracted materials. Objective 10 - Could make reference to the funding opportunities that minerals and waste development can generate through the Landfill Tax Fund and other such initiatives. Objective 11 - Could include a prioritisation in the site selection methodology for site with close access to Strategic Road Networks.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
171 North Yorkshire Waste Action Group (NYWAG)	1017	Q05		Some of the objectives are not supported by AWRP. Objective 1 - AWRP has the opposite effect due to its reliance on incineration. Objective 7 - Should have many local sites rather than one central one. Objective 9 - AWRP would be visually intrusive to an unacceptable degree. Objective 11 - AWRP has the opposite effect due to its reliance on incineration.
120 English Heritage	0293	Q05		Broadly support the Objectives which are proposed to deliver the Vision, especially - Objective 3 relating to safeguarding important minerals resources for the future. As one of the important minerals resources of the Joint Plan area, there is a need to ensure that sources of building and roofing stone are not sterilised by other uses. - Objective 5. Support the part of this objective which relates to ensuring an adequate supply of minerals contributes to local distinctiveness. North Yorkshire's rich architectural heritage owes much to the great variety of stones used in buildings and other structures and the Joint Plan area has, historically, been a supplier of building stone not just for the local area but elsewhere across the County. - Objective 9 relating to the protection of the natural historic environment, the landscapes and the tranquil areas of this part of North Yorkshire. This objective will help deliver that part of the Vision which seeks to ensure that the demand for minerals takes place in a manner which protects the environmental assets of the County.
1174	2074	Q05		Objective 4 - Agree Objective 9 - Agree Objective 11 - Agree, particularly with ' the provision of ecosystem services and maintenance of agricultural capacity' provided it is more than a tick box exercise. Objective 12 - agree, but 'delivering benefits for biodiversity, recreation opportunities must only be incidental to gaining permission and not a major consideration in the decision to quarry, 'climate change adaptation' must be based on sound science.
2253	2088	Q05		Generally Supportive of Objective 1 but would like to see it strengthened i.e. Aim to exceed national targets as these are less ambitious than some countries.  Very Supportive of Objectives 9, 10 and 11.  Disagree with Objective 5 as it encourages wasteful use.
2864 Coke Turner & Co Limited	0413	Q05		Agrees with Objective 5. The MWJP must ensure policies provide for the steady and adequate supply of minerals needed to contribute to local and wider economic growth.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
94 Craven District Council	2306	Q05		The objectives are well considered and based on local evidence together with national and international policy.
2865 Zurich Assurance Ltd	1583	Q05		Objective 9 should include a reference to the potential mineral workings can have on contributing to the long term aspirations for an areas natural environment. Short term impacts can be mitigated and restoration provides a opportunity for long term improvements to the environment e.g. appearance and biodiversity.
2865 Zurich Assurance Ltd	1582	Q05		Support Objective 8 insofar as it seeks to encourage alternatives to the existing road network such as the Mineral Transport System proposed by York Potash Ltd as part of their Sneaton Project.
2865 Zurich Assurance Ltd	1581	Q05		Strongly support Objective 5, ensures continuity of minerals supply within the wider context of economic growth, the well-being of local communities and the quality of the environment.
2865 Zurich Assurance Ltd	1580	Q05		Strongly support Objective 3 which safeguards resources vital to the well being of the local and national economy.
112 Highways Agency	0417	Q05		<p>Generally supportive of the objectives of the Plan, in particular Objective 3. Objectives 6 to 8 are also supported. The inclusion of Strategic sites within the Plan should help ensure that the traffic impacts of development and requirements for supporting transport infrastructure can be assessed up front as part of the plan making process.</p> <p>Supports the intention of Objective 7 (seeking to minimise overall transport distances of travel) as this would reduce the amount of traffic associated with minerals and waste utilising the SRN.</p> <p>Supports objective 8 but seeks to ensure that the impact on the SRN is minimised and has capacity to accommodate the necessary traffic impact of the development. Where new or improved infrastructure would be required the Agency would expect such improvements to be assessed, developed and identified as part of the evidence base for the Plan.</p> <p>Supports objective 10 which coincides with the Agency's objective to ensure that the safe and efficient operation of the SRN is maintained and is capable of supporting sustainable economic growth across the region.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2991 Envireau Water	1542	Q05		Objectives 2 & 5 appear to conflict with other SA objectives. Consider waste and mineral sites objectively and pragmatically on a site-by-site basis. Sites which present potentially negative impacts on SA objectives emphasis must be placed on appropriate and enhanced mitigation measures.
157	0130	Q05		Some of the objectives are not compatible with the development of AWRP; Objective 1- AWRP would not move waste further up the hierarchy because it relies on incineration. Objective 7- AWRP is a single site and the plan should use multiple sites Objective 9- AWRP would be visually intrusive. Objective 11 (positive climate change aspirations)- AWRP would have higher green house gas emissions that other technologies
2779 Pickering Civic Society	0033	Q05		Proposals for waste management must ensure that levels of recycling are not jeopardised by any contract to supply waste for incineration. Transport of waste to any such facility must be assessed to be cost effective.  Waste water would become an issue if fracking were to take place. The transport and storage must be addressed before development takes place.
1112 RSPB North	1716	Q05		Support aspirations of objectives, particularly Objectives 9, 11 and 12. Particularly pleased to see reference in Objective 12 to 'supporting the utilisation of a strategic, landscape scale approach to reclamation where this could help minimise overall impacts and deliver maximum benefits.' This approach should be made more explicit in the Vision. Objective 12 should specifically promote a restoration-led approach, which will help to maximise the desired benefits. Suggest rewording Objective 12 to - Implementing a strategic, landscape-scale, restoration-led approach, which maximises benefits for biodiversity, recreation opportunities and climate change adaptation through reclamation of mineral workings.'
2609 York Environment Forum	2197	Q05		Objective 10 should include SAFETY. Re-word to read " This includes promoting high standards of SAFETY, design.....". There is no mention of waste water for minerals and gas extraction. How this is managed is highly relevant and should be included in this objective.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2994 Inland Waterways Association- West Riding Branch	1706	Q05		Support the safeguarding of wharfs in Objective 3.
2994 Inland Waterways Association- West Riding Branch	1707	Q05		Support promoting the use of water as a sustainable alternative to road transport in Objective 8.
2942	0599	Q05		Agree with Objective 5. The MWJP must ensure policies provide for the steady and adequate supply of minerals needed to contribute to local and economic growth.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1758	Q05		Support the Objectives.  Especially Objectives 1, 8, 9, 10, 11 and 12
2943 Yorkshire Coast Minerals Association	0593	Q05		Agree with Objective 5. The MWJP must include policies that provide for a consistent and adequate supply of minerals needed to contribute to local and national economic growth.
1033 CTC North Yorkshire	2251	Q05		Strongly support Objectives 8-12.
120 English Heritage	0294	Q06		In terms of amendments to the suggested Objectives consideration should be given to the following amendments - Objective 9 - whilst it is necessary to reconcile minerals and waste developments with the protection of the environmental assets of the plan area, opportunities should also be taken to maximise any opportunities that such developments could provide to enhance the significance of these areas. It is suggested therefore that Objective 9 is amended as follows "Protecting and, where appropriate, enhancing the natural and historic environment, landscapes and tranquil areas of the Joint Plan area"

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1717	Q06		Support aspirations of objectives, particularly Objectives 9, 11 and 12. Particularly pleased to see reference in Objective 12 to 'supporting the utilisation of a strategic, landscape scale approach to reclamation where this could help minimise overall impacts and deliver maximum benefits.' This approach should be made more explicit in the Vision. Objective 12 should specifically promote a restoration-led approach, which will help to maximise the desired benefits. Suggest rewording Objective 12 to - Implementing a strategic, landscape-scale, restoration-led approach, which maximises benefits for biodiversity, recreation opportunities and climate change adaptation through reclamation of mineral workings.'
422 Bilton-in-Ainsty with Bickerton Parish Council	0712	Q06		Beat Value for money should be the starting point for any proposal, with the current alternatives being costed and considered.
252 York Potash	1059	Q06		There should be an additional economic Objective that seeks to realise the potential of potash/ mineral reserves and maximise their contribution to the economy of the area and local communities.
1174	2075	Q06		The objectives do not appear to include 'joining up' the matters of land-use and landscape character.
3006	2232	Q06		Develop policies which will increasingly lead to the restriction of fossil fuels.
231	2141	Q06		EfW incineration should be required to demonstrate that it can provide a net reduction in carbon emissions over its lifetime, taking account grid energy displaced and recycling opportunities missed. Would welcome a bench mark on what constitutes 'energy recovery' in incineration.
585 Green Hammerton Parish Council	0536	Q06		Seek value for money. At least 3 alternatives to AWRP should be considered (AWRP, export, MBT).
215	1890	Q06		Reduce and reuse, encourage further reductions in the sources of waste and reuse the waste. Recycle, further increase recycling. Use cheaper technologies to deal with residual non-recyclables such as thermal treatment, and landfill the small volume of remaining solids.
157	0131	Q06		A financial objective which seeks to achieve best value for money should be included.
171 North Yorkshire Waste Action Group (NYWAG)	1018	Q06		Seek best value for money. There are at least three alternatives, AWRP, export, MBT or MBT/AD should be evaluated.

**Section:**                      **005: Aggregate Supply**

**Chapter:**                      **5**

**Policy No:**

122	CPRE (Swaledale Branch)	1359		<p>Concerned that the MWJP must make provision for exporting a significant proportion of aggregate as well as maintaining provision for local use.                  Concerned the YDNPA Policy is to phase out quarrying there would be increased demand on the MWJP area to supply the shortfall and make greater provision. There has been a recent aggregate rail loading facility in the Ribblesdale area which might mean continued quarrying for years to come.</p>
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2333	Dringhouses and Woodthorpe Planning Panel	2295	5.1	<p>The extraction of minerals such as chalk, clay and rocks must be clearly covered with the licence arrangements to ensure visually satisfactory re-habitation of the area, for wildlife and/or leisure activities.</p>
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118	East Riding of Yorkshire Council	1687	5.21	<p>The document states 0.1mt landed at Hull annually, was actually 0.192mt in 2009 according to recent marine study.</p>
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306	Redcar & Cleveland Council	1097	5.27	<p>Given constraints on mineral supply within the Tees Valley, and the absence of additional viable sites, there is expected to be a continued need for the supply of minerals from the North Yorkshire area to play a significant role in meeting demand within the Tees Valley sub-region, particularly in relation to sand and gravel. Where there is potential for increased contribution of marine dredged aggregate, reducing the reliance on land won aggregate from the Joint Plan area, the potential for such sources to make a greater contribution to supply is likely to be of only limited significance in the near term.</p>
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**Policy No:**                      **id01**

1174		2076	Q07	<p>The extraction of sand and gravel should not continue between the Moors and the Dales unless the landscape can be restored to its pre-existing landform and land use.</p>
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Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
116 Ryedale District Council	1164	Q07		<p>Where there is a proven need for additional supplies of minerals, a balance must be made between the economic benefits to be gained from extraction, with any negative environmental, economic or social impacts on local communities.</p> <p>In Ryedale, it is the Council's view that future extraction should be focussed at existing facilities rather than creating new workings. However it is recognised that this may not be possible. Therefore it is considered that the overall geographical approach for new aggregates is that they are met generally from outside of protected landscapes. The Principle of supply arising from the City of York should not be ruled out. Therefore Option 2 is supported.</p>
330 Harrogate Borough Council	2370	Q07		Support Option 2
2197 CPRE (Harrogate)	1065	Q07		<p>Requirement for aggregate has fallen over past few years as development slow. York should contribute to the provision of aggregates as would lessen pressure on National Parks and AONBs.</p> <p>Current sites are well located which reduces need for long distance transportation.</p>
2253	2089	Q07		<p>Preference for Option 1.</p> <p>Support protecting these areas.</p>
128 Yorkshire Wildlife Trust	0747	Q07		Would support Option 1. More detail is needed on the potential sand extraction sites in York as these could impact on sensitive habitats. Potential may exist for joining up heathland habitats on restored sites but this would need careful research.
3013	1992	Q07		Preference for Option 2.
713 Kirkby Fleetham with Fencote Parish Council	1405	Q07		<p>Option 2 only reasonable option. There should be no restrictions as to where aggregates are taken from. No reason to exclude City of York and such developments could aid flood control. The fact there is lack of commercial interest is not a reason for excluding the area. York is an expanding city and requires aggregates so to be sustainable these should be sourced locally.</p> <p>If Option 2 not selected it will be in direct contradiction to Option 1 in id02.</p>
94 Craven District Council	2308	Q07		Option 2 is most appropriate. Extraction of sand and gravel in appropriate areas in the York area should be allowed as this is where the most significant scale of development will take place and is within the proximity of the A1.
3001	1822	Q07		The National Parks should conserve and enhance the natural beauty, wildlife and cultural heritage of the region. Supply of aggregates is not compatible with this.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1033 CTC North Yorkshire	2252	Q07		Preference for Option 1
2760 White Quarry Farm	0817	Q07		Preference for Option 1. This approach is consistent with the NPPF and represents the best option in terms of protecting the landscape and environment.
119 Natural England	0905	Q07		Favours option 1. Both Options direct further mineral extraction away from the National Park and AONBs, however Option 1 would also direct extraction away from York and potentially Strensall Common SAC, which is located within an area of building sand resources.
1577 Lafarge Tarmac	0953	Q07		Preference for Option 2.  Provides the most flexibility in seeking to meet the requirements for new aggregates supply in line with national policy.
92 Durham County Council	1785	Q07		Does not wish to express a particular view in relation to either of the options identified but would like to highlight that paragraph 144 of the NPPF states that "as far as practical", provide for maintenance of landbanks from outside the National Parks and AONBs. Our interpretation of this wording is that it does not allow a blanket presumption against working in these areas, but requires that MPAs seek, wherever possible, to maintain landbanks from outside of them. Whether areas outside the National Park and AONBs can maintain the required landbanks of non-energy minerals is for the joint plan authorities to determine.
134 Nidderdale AONB	1002	Q07		Preference for Option 1. The draft does not contain enough evidence to support continued exploitation of aggregates in National Parks and AONBs such that the tests in NPPF could be met.
1355	2168	Q07		Preference for Option 1
135 FCC Environment	0675	Q07		Preference for Option 1
112 Highways Agency	0418	Q07		No option preference. Sites should be located as close to the intended markets as possible.
2991 Envireau Water	1543	Q07		Preference for Option 2.  Preference should be given to sites located closer to markets and good transport networks. In some cases it is necessary to develop sites in less ideal places, which should not be actively discouraged.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2841 Scarborough, Whitby and Ryedale Green Party	0193	Q07		Option 1 would be best, unless any workings in the City of York boundary could be restricted to small scale and for the very local market.
115 Minerals Products Association	1465	Q07		York City resources should be included when looking for potential locations for reasons of sustainability. If enough sites come forward outside York then the plan should seek to reserve future possibilities in York by identifying an Area of Search. If there is commercial interest in the NYMNP national policy would prevent development except in exceptional circumstances. In the case of sand and gravel do not exist as long as there are resources remaining in North Yorkshire. For AONBs, despite national policy status, consideration should be given to retaining some mineral production if a case can be made on the grounds of scarcity and value to the local economy. Should modify Option 2 so that all parts of the plan area should play their part in minerals provision subject to local geology and the market.
113 Howardian Hills AONB	1596	Q07		Preference for Option 1
713 Kirkby Fleetham with Fencote Parish Council	1406	Q08		Need to ensure reuse and recycling of aggregate material occurs. Where redevelopment occurs this should be made part of the planning approval.
74 Selby District Council	1306	Q08		Sand and Gravel extraction should occur at the most suitable location. National Parks and AONBs should be protected from new extraction sites. Existing extraction sites may be extended subject to conditions to limit degree of expansion, impact on landscape, visual amenity, transport etc. Enabling the local sourcing of Sand and Gravel in York will reduce pressure within other Districts and reduce transportation.
1112 RSPB North	1718	Q08		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
2842	0249	Q08		From a number of the proposals from established commercial mineral extraction companies, it would appear the expansion to existing developments (brownfield) could meet requirements without the need to impact on virgin agricultural land (greenfield) with a new development. Such an approach would be consistent with the NYCC policy to 'protect, conserve and where possible enhance', some of the proposals would be counter to this.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

120 English Heritage

0295

Q08

Given the landscape sensitivity of the National Park and the AONBs, their generally poor connectivity to the primary road network, and the breadth of their environmental assets, we would support a strategy which would reduce the amount of extraction in these landscapes (the first two of the areas identified in Option 1.) Whilst there is a presumption within the NPPF the, as far as practicable, provision for non-mineral minerals should be made from outside the National Parks and AONBs, there is nothing in national planning policy which would advise against minerals supply coming from the City of York. Indeed, although a large proportion of York falls within the green belt, the NPPF would not prohibit mineral development where such development would not conflict with the purposes of including land within the green belt. Consequently, we would not object to the principle of an element of the demand for aggregate supply being met from the City of York area provided that it can be clearly demonstrated that the development would not harm those elements which contribute to the special historic character and setting of York. Such an approach might also help to reduce the pressure on important environmental assets elsewhere in the Joint Plan area.

2197 CPRE (Harrogate)

1066

Q08

In the past key markets have determined the locations of quarries without taking into account sustainable restoration, this needs to be considered in the plan. Transportation unlikely to change. More facilities could be provided on sites where they once existed. Could rail lines be used over night.  
Geological constraints have an impact on mineral locations.

3001

1823

Q08

York should be included in aggregate supply nearest to where it is needed. It is the fastest growing area of the region and it is important to reduce carbon emissions by using supplies nearby. The centre of York with its historic buildings would not be affected by aggregates working on the outskirts.

1174

2109

Q08

Marine extraction

1157 W Clifford Watts & Co Ltd

0612

Q08

An alternative to the two options would be to allow the supply of new aggregate from within the North York Moors National Park from existing quarries in order to preserve the use of the reserve at Spikers Hill limestone Quarry.

**Policy No:**

**id02**

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
204	0021			Do not agree with minerals being transported long distances. Should use local quarries to provide for the local area.  Spaunton Quarry was shut and the work was transferred to Newbridge Quarry, which increased the number of lorries going through Pickering Town and using the narrow roads.
119 Natural England	0906	Q09		No preference is given for either Option.
57 Plasmor Ltd	0828	Q09		Prefer Option 3. This provides flexibility for operators to identify sites that may not be close to markets but are preferable in other aspects such as ecology, hydrology or landscape terms and which represents the sustainable use of resources.
113 Howardian Hills AONB	1597	Q09		Prefer Option 1
112 Highways Agency	0419	Q09		Supports Option 1 as will reduce the overall transport distances so reducing the impact on the SRN. Have concerns about Option 2 and the potential impact developments will have on the A1. If this option is chosen the Agency would seek to see a robust evidence base that identifies the distribution of development along the A1 corridor along with any infrastructure improvements which may be required to mitigate both the individual and cumulative consequential impacts of the development. If Option 3 is selected the Agency would seek to ensure that the identification of new sites or areas are tested against relevant criteria and constraints as part of the evidence base of the Plan, including proximity to sustainable methods of transport and anticipated distances of travel to internal and external markets and their impact on the SRN.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1567	Q09		The location of proposals is typically a matter for the determination of the application during development management decisions, and unless there is a specific policy requirement to prevent development that lies outside specific areas then an approach involving the identification of a specific area is not warranted. Any such locational emphasis for the supply of new aggregates need to be fully justified with reference to the full range of policy considerations and constraints. Options 1 and 2 are unjustified and fail to take account of a wide range of other constraints. Option 3 is preferred.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1466	Q09		<p>Options are artificial as sites serving major markets are already as close to the markets and accessible to them as the quality of the mineral will allow. There may be mineral present closer to the market but it will usually be inferior quality, in low demand or constrained by planning policy. The aggregate sites in Ripon and Catterick are best placed to serve their respective markets. These sites serve fixed outlets or added value plants located closer to their markets as it is more economic to transport processed aggregate to these plants for further processing which has a limited 'shelf life' and must reach the end user quickly. Once resources are depleted decisions will have to be made to relocate supply to new areas. Exceptions may be justified to serve local markets, specialist uses or when there is a major increase in demand.</p> <p>A justified spatial policy will recognise the importance of the existing supply pattern to supply respective markets. Planning Policy could favour extensions of established sites, followed by new sites as replacements or for increased capacity.</p> <p>If this approach, which takes account of economic rationale for the aggregate supply pattern, is accepted then the SA will need to be amended. The summaries are biased towards the environmental effects of mineral working and vague on the economic and social aspects of sustainability.</p>
1174	2077	Q09		No preference. The key issue is the long term effect on landscape and land use, the policies should not be over prescriptive.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0296	Q09		<p>Favour Option 3 because</p> <ul style="list-style-type: none"> <li>- Whilst Option 1 would reduce distances which aggregates would have to travel, a strategy which seeks to establish new sources of supply as close as practicable to the main external markets could put pressure for the development of new quarries in some of the most environmentally-sensitive parts of the joint plan area. This approach could, potentially, pose a greater threat to the environment of the County than a strategy which enables assessed needs for sand and gravel to be met from across the whole of the Plan area (excluding the National Parks and AONBs)</li> <li>- Whilst Option 2 would provide good access routes to the external markets for sand and gravel, there is a considerable concentration of designated and undesignated heritage assets along the route of the A1 as it follows the Magnesian limestone ridge. So we would have concerns about the impact which concentrating aggregate supply from this part of the Joint Plan area would be likely to have upon the historic environment.</li> <li>- Whilst Option 3 would be likely to increase the distances which aggregate would have to travel, such a strategy would enable the choice of sites to be made which better safeguarded the environment of the plan area and the amenities of its communities</li> </ul>
2781 Cromwell Wood Estate Co Ltd	1650	Q09		Preference for Option 3
713 Kirkby Fleetham with Fencote Parish Council	1407	Q09		<p>Option 1 and 2 contradict Option 1 in id01, York is a key centre of population and new development, so development of aggregate sites should also occur there.</p> <p>Option 3 is the most appropriate as provides flexibility for development of a local site to service local needs. In the case of the A1 upgrade it would make sense to use immediately adjacent aggregate sources rather than transport them from a distance, which would be in direct contradiction to the policies stated in the SA report.</p>
3013	1993	Q09		Preference for Option 2
2210	1810	Q09		Preference for Option 1, the closest source of supply
1577 Lafarge Tarmac	0954	Q09		<p>Preference for Option 3.</p> <p>Provides the greatest flexibility for supply to be provided from a variety of locations.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
92 Durham County Council	1786	Q09		<p>Welcomes recognition in paragraphs 5.11 - 5.14 of the consultation document that " Demand for aggregates is driven by construction, which means that demand tends to be associated with larger urban areas, where growth and economic development activity tend to be concentrated...."</p> <p>"As well as serving markets within the Joint Plan area a number of key external markets for aggregate exist, such as South and West Yorkshire and the North East Region, particularly the Tees Valley area." and; " it is anticipated that, as a result of established markets and supply patterns, and an expectation of on going growth and development in these areas, the Joint area will continue to play an important role in the supply of aggregates to these areas over the plan period, as well as serving more local markets within North Yorkshire and York".</p> <p>Supports Option 2. Such an approach would enable North Yorkshire to continue its existing long standing approach of identifying a northern facing sand and gravel landbank. Such an approach would allow North Yorkshire to help to assist MPAs in the North East of the region to meet the needs of Tees Valley sub-region. Please note that it is anticipated that Durham CC will continue to serve markets in the Tees Valley and that Durham CC intends to continue to argue that the Tees Valley group of authorities should seek wherever possible to make appropriate contribution to meeting its own needs in the future.</p>
2991 Envireau Water	1544	Q09		<p>Preference for Option 3.</p> <p>Preference should be given to sites located closer to markets and good transport networks. In some cases it is necessary to develop sites in less ideal places, which should not be actively discouraged.</p>
3001	1824	Q09		<p>Preference for Option 1.</p> <p>However, communities en-route would be affected by traffic. The road and rail infrastructure in the region is very poor.</p>
1157 W Clifford Watts & Co Ltd	0613	Q09		<p>Prefer Option 3 as allows operators flexibility to identify sites that may not be close to markets but are preferable in other respects such as ecologically, hydro geologically or in landscape terms and which represent sustainable use of resources.</p>
116 Ryedale District Council	1235	Q09		<p>Option 1 is supported.</p>
135 FCC Environment	0676	Q09		<p>Preference for Option 2</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2841 Scarborough, Whitby and Ryedale Green Party	0194	Q09		Definitely not option 3. The Sustainability Appraisal detail should be used to choose between Option 1 and Option 2, with climate change and food supply being the overriding considerations.
2760 White Quarry Farm	0818	Q09		Preference for Option 1. The optimum environmental solution is to locate the sources of supply as close as possible to areas of demand.
1135 Lightwater Quarries Ltd	0940	Q09		Prefer Option 2 as represents the most sustainable option for the distribution of mineral from source to market, especially the Magnesian limestone resources.
1355	2169	Q09		Preference for Option 2
911 Tockwith & Wilstrop Parish Council	0077	Q09		Support Option 1. This option is preferred because new supply would be provided as close to as practicable to the main sources of supply. This preference is caveated with the proviso that site operations and transport to and from the site is controlled to prevent inconveniences, disturbance and loss of local amenity on local communities is minimised to acceptable levels, limiting potential impacts from noise, dust, vibration and visual impact.
94 Craven District Council	2309	Q09		Option 2 is reasonable as would reduce the level of heavy traffic on minor roads, would allow access to major markets and reduces impacts upon local communities.
286 Scarborough Borough Council	2392	Q09		Support the principle of sourcing aggregates near to areas of potential development whilst acknowledging the need to consider where material is likely to be exported to when determining appropriate locations.
1033 CTC North Yorkshire	2253	Q09		Preference for Option 1
1577 Lafarge Tarmac	0955	Q10		A justified spatial policy would recognise the pre-eminence of the existing pattern of supply to respective markets, i.e. by favouring extensions to established units, followed by new sites as replacements or for increased capacity.  This suggested new policy option would take account for the economic rationale for the aggregate supply system with location of sites being determined by a combination of geology, markets, access and investment decisions. Current sites are already located as close to markets as the quality of the mineral will allow. Only when resources are depleted will a decision have to be made to relocate supply to new areas; although there may be exceptions to serve local markets, specialist uses or increase in demand.



Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

74 Selby District Council

1307

Q10

Location of workforce should be factored into location of new sites. Generally existing sites should be explored for additional extraction prior to new sites, with a robust demonstration of need, assessing impacts upon landscape, noise, dust, vibration and traffic. The SDC LP SP13 supports sustainable development in greenfield and previously developed land in rural areas, providing there is robust need.

1112 RSPB North

1730

Q10

It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.

Recommends that the Joint Plan identifies Areas of Search that incorporate the potential strategic restoration objectives into identifying where mineral development should be located. The steps involved in this approach are

- assess all aggregate resources to identify which are likely to be significant.
- Identify where these significant resources cluster into groups that are big enough to develop a strategy that would deliver co-ordinated, strategic restoration benefits.
- Identify whether these clusters of resources have the potential to serve likely areas of demand for aggregates.
- Use these considerations to identify Areas of Search which form the basis of a spatial strategy.

**Policy No:**

**id03**

128 Yorkshire Wildlife Trust

0744

The response from previous consultations showed concern for the effects on biodiversity or marine dredging. This should be considered as an area requiring further research. A policy expecting marine aggregates to replace land won aggregate would lead to an impact on marine biodiversity as suggested in Option 5. An option that affects marine biodiversity should not be considered. Marine dredging can also affect processes and erosion at other parts of the coast.

1100 Aggregate Industries

0486

It is unlikely that there will be a significant increase in supply of marine dredged sand and gravel in the period to 2030. It is more cost effective to supply crushed rock fines. Aggregates could be delivered to railheads by train from Bardon Hill or to ports by ship from Glensanda.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2766 Derbyshire County Council	0947	5.28		<p>Option 6 suggests that there is potential for an increase in the supply of sand and gravel from East Midlands to West and South Yorkshire, with para 5.28 referring specifically to Derbyshire, which would reduce demand on the North Yorkshire Southern Distribution Area.</p> <p>DCC have not discussed this issue with West and South Yorkshire in relation to Sand and Gravel, only Crushed Rock. DCC does not envisage that more sand and gravel will be exported to these areas over the plan period. Nottinghamshire County Council has indicated that more of its sand and gravel could potentially be exported to South Yorkshire. DCC sand and gravel resource travels a maximum of 20-25 miles, whereas West and South Yorkshire is 40-50 miles distance, therefore it its unlikely that this resource will be exported to these areas in significant quantities.</p>
2842	0229	Q11		<p>Option 1 is the baseline based on current expectations.</p> <p>Options 2 and 3, increased output, are unjustified with only stunted economic growth at present along with options for additional potential sources of sand and gravel elsewhere in the report.</p> <p>Option 4, revisiting in 2020, seems more appropriate, at this point there would be more clarity on additional sources and economic growth.</p> <p>Option 5, using marine aggregate should be further explored ahead of development of greenfield sites.</p> <p>Option 6 seems to indicate potential reserves in other areas including East Midlands, Tees Valley and South York's, without the detail of these being understood it would be unwise to commit to further developments.</p>
118 East Riding of Yorkshire Council	1688	Q11		<p>Option 5 - a problem with marine supply is the limited ability to realistically safeguard sites at Hull or Goole docks which is ABP land and as such benefits from extensive PD rights. If preferred options involve increasing reliance on marine aggregates then Humber authorities would wish to see strong support from the Joint Authorities for any safeguarding policies in our respective local plans as they come forward.</p>
2197 CPRE (Harrogate)	1067	Q11		<p>Prefer either Option 4 or 6.</p> <p>Concerned about if the level of export of sand and gravel is sustainable. Could York contribute to the supply. Will be pressure on reserves in the future especially if housing market picks up.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0297	Q11		In view of the uncertainty regarding whether or not 10 year annual sales represents realistic indicator of future sand and gravel extraction, we would favour a variation on Option 4 whereby the 10 year average sales figure is used as the basis for the calculating of future supply but a review of sand and gravel sales (and alternative sources of supply) takes place in 2019 and, if need be, the figures revised accordingly.
2841 Scarborough, Whitby and Ryedale Green Party	0195	Q11		Prefer Option 6 as it has the lowest environmental impact. Have to find different ways of working for sustainability. Concrete has a high CO2 impact. Re-use and use less should be the aim.
116 Ryedale District Council	1165	Q11		The Council is not best place to comment on the technical detail of each option, but considers that it is important for the Plan to have sufficient flexibility built in. Option 1 could be appropriate with a commitment to monitoring or Option 4 providing the review trigger is capable of taking into account supply which may arise from external sources.
115 Minerals Products Association	1467	Q11		<p>Sand and gravel provision should be calculated with a forecast of demand in mind and should not just be an average of the last 10 years sales data. The NPPF states that the 10 year average is the basis for a demand calculation, but this also needs to include any other local information. This may include proposed requirements for housing supply in LPAs forward plans plus likely changes to supply patterns. The MPA in the best position to look at how changes to expected housing completion rates will differ from the past 10 years. Supply patterns will be affected by the depletion of resources in South and West Yorkshire and increase in marine aggregate. There is no economic alternative than for West Yorkshire to rely increasing on North Yorkshire to supply aggregate. South Yorkshire is more likely to receive increased imports from east Riding or Nottinghamshire.</p> <p>There is unlikely to be a significant increase in marine aggregate for at least 20 years, so no account should be taken of marine aggregate increase in the Plan. It is unlikely that the North East will be able to reduce imports form North Yorkshire.</p> <p>There will be a greater call on reserves in North Yorkshire than the 10 year average. Rather than relying on percentage increases, which may not stand the scrutiny of examination. The MPA need to look at a proxy for demand. Other MPAs have used housing completions for example. Any percentage increase/decrease in planned housing completions could then be applied to the 10 year average aggregate figures. Make reference to West Yorkshire LAA to identify any shortfall.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
94 Craven District Council	2310	Q11		Option 4 seems the most appropriate given the current uncertainties. This allows for a review and therefore should there be a change in demand flexibility is in place to accommodate this.
713 Kirkby Fleetham with Fencote Parish Council	1408	Q11		Option 6 supported, especially if more emphasis is put on recycling aggregate material.
2781 Cromwell Wood Estate Co Ltd	1651	Q11		Preference for Option 3
1577 Lafarge Tarmac	0957	Q11		Supports the MPA representation. Sand and Gravel provision should be calculated with a forecast of demand in mind and not just be an average of last 10 years sales data. In line with NPPF it should also include other relevant local information e.g. housing completions.
112 Highways Agency	0420	Q11		No Option preference. Option 5 would have some potential to reduce the transport of aggregate by road. Option 6 could reduce the amount of traffic on the SRN as demand for aggregate in the Plan area would be less. For each option new sites would need to be tested against relevant criteria and constraints as part of the Plans evidence base.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
92 Durham County Council	1787	Q11		<p>Welcomes paragraphs 5.15- 5.23.</p> <p>Durham CC understands the range of options proposed by NY and would favour an approach based on national guidance as set out in the Planning Practice Guidance. It does not favour an approach based on matters which the Joint Plan authorities do not have any control over i.e. future levels of extraction in adjoining areas or level of marine imports which at best may be described at this time as uncertain.</p> <p>In overall terms Durham CC favours an approach based on Option 1 and 3. Option 1 partially meets the requirements of paragraph 62 of the Planning Practice Guidance by virtue of basing future provision on 10 year sales data. However, Option 1 does not appear to take account of other relevant factors such as local implications of the National Infrastructure Plan or levels of local growth set out in the emerging Local Plans. Option 2 is not favoured as it is partially based on the revoked RSS. Option 3, any uplift figure used should be based upon local information and fully justified. Option 6 is based on factors which lie outside the Joint Plan authorities control and is not favoured. While Durham CC accepts that its landbank is now at a historical high (in terms of levels over the last 10 years) and those reserves are sufficient to sustain a potential increase in sales for a number of years we consider that there are at this point major uncertainty in terms of future sand and gravel production (information about tonnages and life spans of County Durham's Quarries is provided as part of the consultation responses).</p>
1355	2170	Q11		Preference for Option 6
2759 Wintringham Estate	0824	Q11		Preference for Option 3. Consider that the projections should not be based on recessionary patterns and therefore it is correct to add an additional allowance to take into account increased demand for sand and gravel over the new plan period.
3001	1825	Q11		<p>Preference for Option 6.</p> <p>Least worst option.</p>
3013	1994	Q11		Preference for Option 6
57 Plasmor Ltd	0829	Q11		Preference for Option 4 is preferable as it provides the opportunity for review in 2019 of sand and gravel sales and the calculated provision over the plan period can be amended to reflect the results of the review.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

2215 CPRE (Hambleton Branch)

0108

Q11

Option 4 would be preferable.

Option 1 appears reasonable as this embraces a 10 year period which contains a 6 year boom in the construction industry followed by a recession and very slow recovery. It is considered that option 2, which assumes increased demand, can not be justified.

Option 3 cannot be justified.

Option 5 considers the potential increase from marine dredged aggregates. These should be explored and it is considered that permission to extract sand and gravel from new 'greenfield' sites should be held back until more work has been carried out on assessing the potential of marine aggregates.

Options 6 refers to potential supply sources outside the Area (York, Tees Valley, South Yorks and Wharfedale in the Leeds/ Bradford Area) it is considered that detailed assessment of these areas should be made before confirming any above base assessment of demand on North Yorkshire.

3001

1826

Q12

There is an urgent need to consider the carbon emissions from exporting large quantities of sand and gravel out of the region, currently 60%.

120 English Heritage

0298

Q12

In view of the expectation that there is likely to be a shift towards marine-sourced sand and gravel in the longer term, the review of sand and gravel sales in 2019 which is proposed under Option 4, should also factor in the amount of aggregate that could come from sources outside the Joint Plan area.

713 Kirkby Fleetham with  
Fencote Parish Council

1409

Q12

Encourage recycling of aggregates

**Policy No:                      id04**

171 North Yorkshire Waste  
Action Group (NYWAG)

1011

Sand and gravel should only be extracted where adequate means of restoring the landscape have been identified. This implies that some landfill is necessary and the Plan should allow for this.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
92 Durham County Council	1788			<p>Welcomes the recognition that "the significance of external as well as internal markets for concreting sand and gravel form North Yorkshire has been recognised for a substantial period of time...." and " Given known limitations on resources and availability of indigenous supply in both the Tees Valley and South and West Yorkshire areas, it is considered likely that there will be an on going call on concreting sand and gravel resources in both northwards and southwards distribution areas for the foreseeable future."</p> <p>Paragraph 5.29 - Durham CC would be concerned over any action to limit exports to adjoining areas in the short to medium term. This timescale is highlighted given the uncertainties identified above which prevent any guarantee of any increase in sales from Co. Durham over historical levels at this point in time.</p> <p>Durham CC would support the continuation of a northern facing landbank.</p>
2766 Derbyshire County Council	0948	5.28		<p>Option 3 suggests that there is potential for an increase in the supply of sand and gravel from East Midlands to West and South Yorkshire. This is unlikely to be sourced from Derbyshire County Council.</p> <p>(See Comment 0947)</p>
215	1884	Q13		<p>The Plan should incorporate using landfill for the restoration of land used for mineral extraction.</p>
115 Minerals Products Association	1468	Q13		<p>Prefer Option 1</p> <p>Prefer the retention of the southwards and northwards distributions areas when allocating future sites. Justified as based on the different markets served.</p> <p>If the two areas are combined the balance between the two areas may be adversely affected with surpluses developing in one at the expense of the other and shortages becoming entrenched.</p> <p>If the general quantum of apportionment is modified by a demand forecast then the overall variation between the two areas will remain the same.</p>
3013	1995	Q13		<p>Preference for Option 1</p>
1355	2171	Q13		<p>Preference for Option 3</p>
94 Craven District Council	2311	Q13		<p>In terms of distribution Option 4 seems the most appropriate as delivery of large scale projects and future changes within the economy are uncertain.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
713 Kirkby Fleetham with Fencote Parish Council	1410	Q13		Obvious solution is to go for Option1. If demand changes then the situation can be reviewed at planning permission stage for new sites.
120 English Heritage	0299	Q13		Do not favour any of the Options. The proposed strategy of splitting the landbank into two areas could, if the resource in one of the two areas is nearing its limit, put pressure for the release of additional sites within that area to meet its demands, even where that demand could be met by existing sites within the other area. Such an approach could, potentially pose a greater threat to the environment of the County than a strategy which enables the assessed needs for sand and gravel to be met from across the whole of the Plan area where necessary.
2781 Cromwell Wood Estate Co Ltd	1652	Q13		Preference for Option 1
3001	1827	Q13		Preference for Option 1
2759 Wintringham Estate	0825	Q13		Preference for Option 1. Consider that this option is the most appropriate; however, consideration also should be given to the site's proximity to the strategic highway network. Site MJP50 is located close to the strategic highway network (A64) and therefore could serve both northern and southern markets.
2197 CPRE (Harrogate)	1069	Q13		Preference for Option 3
1577 Lafarge Tarmac	0958	Q13		Preference for Option 1.
				Supports the retention of the southwards and northwards distribution areas in making provision for sand and gravel.
112 Highways Agency	0421	Q13		Prefer Option 1 as under the SA displays positive effects in relation to transport. For each option new sites would need to be tested against relevant criteria and constraints as part of the Plans evidence base.
116 Ryedale District Council	1166	Q13		It is considered that a continuation of the current pattern of distribution represents the most appropriate option and it reflects current market demand (option 1)
306 Redcar & Cleveland Council	1140	Q13		Support options that continue to plan for the Joint Plan area's role in the supply of aggregate minerals to northern markets, including the Tees Valley. This will in accordance with the NPPF.
1100 Aggregate Industries	0533	Q14		Ultimately the location of sand and gravel working is dictated by geology. The most logical areas of future working are in Kirkby Fleetham and the Scotton area.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0300	Q14		If the Joint Plan does decide to adopt a strategy of sub-dividing the landbank for sand and gravel into two areas, it should include provisions that, where sufficient allocations cannot be identified from within each of the individual distribution areas, the total allocations for sand and gravel will be identified from across the whole of the plan area. This would help to ensure that there is not pressure for extraction from areas likely to harm the environmental assets of the County.
3001	1828	Q14		The implications of transporting sand and gravel around and out of the region need to be considered along with carbon emissions. Railways need to be used more and closed lines brought back into use. There are several AQMAs in the region that have not been improved in spite of NYCC being aware of the issue.
74 Selby District Council	1308	Q14		Supports continuing the on-going level of existing provision to meet future demand. Consider a potential increase in provision to facilitate HS2 in the latter part of the plan.
<b>Policy No:</b>	<b>id05</b>			
2781 Cromwell Wood Estate Co Ltd	1653	Q15		Preference for Option 1 and 3
2759 Wintringham Estate	0826	Q15		Preference for Option 1. It is considered that a separate landbank should be provided for sand and gravel in accordance with the NPPF.
713 Kirkby Fleetham with Fencote Parish Council	1411	Q15		Options 1 and 3 only ones which make sense. Option 2 goes against the SA.
92 Durham County Council	1789	Q15		Would support option 1 and 3.
2197 CPRE (Harrogate)	1070	Q15		Preference for Option 1
1577 Lafarge Tarmac	0959	Q15		Preference for Options 1 and 3
3013	1996	Q15		Preference for Option 3
115 Minerals Products Association	1469	Q15		Option 1 and Option 3 supported following on from comments relating to overall distribution of sand and gravel.
57 Plasmor Ltd	0830	Q15		Option 2 and 3 are preferable. Option 2 follows guidance in the NPPF and option 3 would ensure that existing mineral sites are efficiently worked and allow operators to respond to changing levels in demand.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
112 Highways Agency	0422	Q15		No preferred Option. Option 2 is the least preferred as under the SA it is assessed as having the worst effects in relation to transport.
116 Ryedale District Council	1237	Q15		The principle of time extensions of existing sand and gravel quarries, to allow full extraction of permitted reserves (Option 3)
1355	2172	Q15		Preference for Option 3
94 Craven District Council	2312	Q15		In light of Option 4 being deemed the most appropriate for distribution, Option 2 is preferred in this instance.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0155	Q15		Support Options 2 and 3. Option 2 offers greater flexibility whilst Option 3 would introduce a greater degree of sustainability.
1112 RSPB North	1719	Q16		<p>It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.</p> <p>Recommends that the Joint Plan identifies Areas of Search that incorporate the potential strategic restoration objectives into identifying where mineral development should be located. The steps involved in this approach are</p> <ul style="list-style-type: none"> <li>- assess all aggregate resources to identify which are likely to be significant.</li> <li>- Identify where these significant resources cluster into groups that are big enough to develop a strategy that would deliver co-ordinated, strategic restoration benefits.</li> <li>- Identify whether these clusters of resources have the potential to serve likely areas of demand for aggregates.</li> <li>- Use these considerations to identify Areas of Search which form the basis of a spatial strategy.</li> </ul>

Policy No:

id06

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
92 Durham County Council	1790			For information Durham CC's approach to Mineral Safeguarding is set in Policy 60 of the Pre-submission Local Plan and Appendix D details are also available on the Interactive Proposal Map. The Council would welcome any necessary joint working to ensure that any mineral safeguarding areas within North Yorkshire has regard to the approach taken within the emerging County Durham Plan. In relation to the options presented in terms of Option 3, the Council would not support a safeguarding Option which excludes land within environmentally important
2781 Cromwell Wood Estate Co Ltd	1654	Q17		Preference for Option 1 and 5
1577 Lafarge Tarmac	0960	Q17		Preference for Option 1.  250m is a standardised buffer to prevent amenity conflict with future potential mineral working. Extraction of minerals prior to development should be encouraged in urban areas, National Parks and AONBs, therefore strongly opposed to Option 3.
2197 CPRE (Harrogate)	1071	Q17		Preference for Option 1
1112 RSPB North	1731	Q17		Include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs) in the environmental criteria outlined in Option 3. Option 3 refers to the 'presumption against maintenance of aggregate landbanks in such areas' as being a justification for only safeguarding outside protected landscapes. Recommend that the issues of 'landbanks' and 'safeguarding' are kept separate as safeguarding does not create a presumption that resources will be worked, whereas landbanks are established specifically to make provision for a steady and adequate supply of aggregates.
135 FCC Environment	0677	Q17		Preference for Option 1 and 5
3013	1997	Q17		Preference for Option 1
116 Ryedale District Council	1236	Q17		It would seem prudent to safeguard all known sand and gravel resources with a 250m buffer zone.
713 Kirkby Fleetham with Fencote Parish Council	1412	Q17		Option 1 most appropriate, but 250m buffer not very big and would like to see a larger buffer zone. Option 3 negates long term planning and does not meet the definition of sustainable development used in the SA. Option 5 preferred as more flexible approach allowing small scale development.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
119 Natural England	0907	Q17		Supports Option 3. This complies with the NPPF's approach to the protection of National Parks and AONBs. This approach could be applied alongside the other options which promote safeguarding buffers at larger sites (+0.75mt).
94 Craven District Council	2313	Q17		Prefer Option 1 plus Option 4, based on local consultation and reports undertaken by the BGS.
74 Selby District Council	1309	Q17		Supports the safeguarding of Employment Areas and allocated Employment Sites, unless it is demonstrated that there is no reasonable prospect of the site being used for that purpose.
1355	2173	Q17		Preference for Option 4
115 Minerals Products Association	1470	Q17		<p>Favour Option 1 as 250m has become a standardised buffer to prevent likely occurrences of amenity conflict with future mineral working.</p> <p>Do not support Option 3 as BGS guidance clearly advises including urban areas for minerals such as sand and gravel which may be extracted prior to development. Safeguarding should include environmental designations or else the safeguarding regime will not include the National Park and it will not join up across administrative boundaries. Planning Inspectors have recommended including mineral safeguarding in National Park Local Plans.</p> <p>Option 4 misses the point that prior extraction does not have to be in economically viable quantities for a mineral operation. The material could either be processed and used on site, or hauled for processing elsewhere in quantities which may be quite small. The threshold identified would only be relevant if the mineral were to become a traditional mineral operation with fixed plant and settling lagoons.</p> <p>The MPA should follow BGS guidance closely.</p>
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0156	Q17		Options 2 and 5. Used in conjunction these would maximise the safeguarding of known resources whilst allowing flexibility in protecting as yet unidentified ones.
57 Plasmor Ltd	0831	Q17		Option 1 and Option 5 are preferable. Option 1 allows for a buffer of 250m around sand and gravel resources which is reasonable. Option 5 would safeguard any additional resources not currently identified where supported by adequate information to demonstrate the presence of a viable reserve.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1732	Q18		Include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs) in the environmental criteria outlined in Option 3. Option 3 refers to the 'presumption against maintenance of aggregate landbanks in such areas' as being a justification for only safeguarding outside protected landscapes. Recommend that the issues of 'landbanks' and 'safeguarding' are kept separate as safeguarding does not create a presumption that resources will be worked, whereas landbanks are established specifically to make provision for a steady and adequate supply of aggregates.
1112 RSPB North	1720	Q18		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
<b>Policy No:</b>		<b>id07</b>		
1355	2174	Q19		Preference for Option 3
2760 White Quarry Farm	0819	Q19		Preference for Option 2. It is important that separate provision is made for magnesium limestone, which reflects the guidance in NPPF. However, it is considered that basing future provision on recent average sales figures does not accurately predict future requirements because it is largely based on recessionary trends. The figure should include an additional allowance of 20% to take account of a return to more normal market conditions in the construction industry.
2210	1811	Q19		Preference for Option 1
2841 Scarborough, Whitby and Ryedale Green Party	0196	Q19		Option 3 preferred. We need to re-use more. Also there may be less building than in the previous period.
92 Durham County Council	1791	Q19		The Council would support an approach which seeks to ensure that North Yorkshire maintains a steady and adequate supply of crushed rock. In this regards Durham CC considers it may be beneficial to consider not only the scale of the crushed rock landbank but also its distribution across North Yorkshire and by mineral type. Therefore Option 2 would be supported.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1577 Lafarge Tarmac	0961	Q19		Preference for Option 2.  Best reflects para 145 of the NPPF, i.e. MPAs make provision for maintenance of minimum landbanks whilst ensuring the capacity of operations to supply a wide range of materials is not compromised. Calculate and maintain separate landbanks for aggregate materials of a specific type or quality which have a distinct market.
3013	1998	Q19		Option 1. None from NYMNP
2197 CPRE (Harrogate)	1072	Q19		Preference for Option 1
1135 Lightwater Quarries Ltd	0941	Q19		Support Option 2, the recovery of minerals from such deposits can offer long term benefits, in particular to biodiversity, which goes against what the sustainability appraisal says. The LAA seeks to provide 25.9mt of Magnesian Limestone for the plan period up to 2030. Question the substitution provision noted in 5.44 of the document.
134 Nidderdale AONB	1003	Q19		Preference for Option 3. Wish to see a greater commitment to the use of recycled materials.
2781 Cromwell Wood Estate Co Ltd	1656	Q19		Preference for Option 2
135 FCC Environment	0678	Q19		Preference for Option 2
94 Craven District Council	2314	Q19		Prefer Option 1. Changing the methodology may result in no significant difference.
116 Ryedale District Council	1167	Q19		It is noted that in quantitative terms there is no shortage of crushed rock supply. However, it is acknowledged that when looking across the rock types, there is a shortfall of Magnesian limestone. In reflection of the fact that potential exists for secondary and recycled materials to act as alternatives to Magnesian limestone, it is considered that this should be reflected in the policy approach adopted. Therefore option 3 is supported to help maintain reserves and ensure better use of resources.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1471	Q19		<p>Favour Option 2.</p> <p>NPPF (para 145) advises MPAs to make provision for the maintenance of minimum landbanks whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised. It advises calculating and maintaining separate land banks for any aggregate materials of a specific type or quality which have a distinct or separate market. These criteria appear to be met by Magnesian limestone, which tends to occur in separate locations and so serves different markets to carboniferous limestone to a certain degree.</p> <p>Do not support Option 3 as if the desired qualities of secondary aggregates fail to materialise and there is a shortage of primary mineral, the plan area may import more mineral or higher quality material will get used for lower quality purposes. The market for secondary and recycled material needs nothing more than the sites to process it, the fiscal advantages of this material usually make sure that all suitable sources are fully utilised.</p>
120 English Heritage	0301	Q19		<p>Favour a strategy based on Option 3. There is a considerable concentration of designated and undesignated heritage assets along the Southern Magnesian Limestone Ridge. These include the Neolith ritual landscape at Thornborough which is considered to be intentionally significant and ranks alongside the monuments of Wessex and Orkney in the potential contribution to our understanding of late Neolithic cosmology and the relationship between architecture and the surrounding landscape.</p> <p>Consequently, have concerns about the implications which Option 2 and the identification which a separate provision for this area would be likely to have upon the historic environment. Option 3 may result in higher quality rock being used for lower-quality end uses, this has to be weighed against the impacts which extraction of Magnesian Limestone might have upon the environmental assets in this part of the Joint Plan area.</p>
1157 W Clifford Watts & Co Ltd	0614	Q20		<p>In addition to the three options another option should be considered which allows for the calculated requirement over the plan period plus a contingency to allow for the possibility that sales of crushed rock may increase as a result of growth in economic activity.</p>

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

115 Minerals Products Association                      1472                      Q20                      The MPA, in earlier consultations, made the point that at the end of the plan period the rock landbank (if not topped up) will be on the edge of the national policy minimum, especially if the rundown of sites in the Yorkshire Dales National Park proceeds as intended. It will be prudent for the Plan to identify Areas of Search for new crushed rock sites to take up towards the end of the Plan period. The AoS should be drawn up with industry involvement to achieve realistic areas.

120 English Heritage                      0302                      Q21                      In view of the sensitivity of this landscape and the estimated reserves of crushed rock across the remainder of the Joint Plan, we should support the proposals that there should be a zero requirement for crushed rock from the North York Moors National Park.

1157 W Clifford Watts & Co Ltd                      0615                      Q21                      Do not agree that there should be a zero requirement for crushed rock from the North York Moors National Park. The NPPF states in paragraph 144 that landbanks of non-energy material should be maintained outside the National Parks 'as far as practical'. A policy supporting zero requirement from the National Park would not accord with the NPPF. Spikers Hill is an existing quarry within the National Park and its operation for winning the existing reserves should be supported.

115 Minerals Products Association                      1473                      Q21                      Do not know if there is a requirement for local building stone, but consider it prudent to include a policy allowing its extraction if it is needed.

**Policy No:**                      id08

92 Durham County Council                      1792                      Supports the maintenance of ten year supply of crushed rock. Whether the Joint Plan authorities seek to maintain separate landbanks for crushed rock is a matter for the Joint Plan authorities to determine. You may wish to note that Durham CC considered this matter, but ultimately decided to identify a single crushed rock landbank due to concerns in relation to the long term availability of permitted reserve information for different types of crushed rock.



Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

115 Minerals Products Association                      1474                      Q22                      Favour Option 2.  
Magnesian limestone is an easily identifiable subset of crushed rock with distinct quality and markets and should on the basis of NPPF policy be accorded a separate landbank if it can be provided. There are some important operations in AONBs and if the MPA is going to let these wither then consideration needs to be given to what alternatives are to be provided. These may be further from markets and therefore less sustainable in terms of climate change impact, and they may be different quality. Consideration should also be given to maintaining productive capacity in the plan area so that irrespective of reserve levels there is sufficient means to continue to supply markets. This might involve an unusual decision that it is more sustainable to carry on production in a sensitive designated area and as such development criteria could be provided in lieu of an allocation. The practicality of transferring production out of a designation needs to take into account the impacts of doing so in the wider context. North Yorkshire is already likely to face increased production/sites as the productive capacity of the YDNP decreases, should it add the extra burden of transferring production out of the AONBs as well. So do not support Options 3 and 4

2841 Scarborough, Whitby and Ryedale Green Party                      0197                      Q22                      Preference for Option 3

2760 White Quarry Farm                      0820                      Q22                      Preference for Option 2 and Option 3. Support the creation of a 10 year landbank for Magnesian limestone and the principle of allowing time extensions for mineral working at individual sites. However, these landbanks should be outside National Parks and AONBs in accordance with NPPF.

1135 Lightwater Quarries Ltd                      0956                      Q22                      Prefer Option 2

3013                      1999                      Q22                      Preference for Option 3

135 FCC Environment                      0679                      Q22                      Preference for Option 2 and 3

94 Craven District Council                      2315                      Q22                      Prefer Option 1 along with Option 1 from id07 would appear most appropriate.

1577 Lafarge Tarmac                      0962                      Q22                      Preference for Option 2.

Magnesian Limestone is an identifiable sub-set of Crushed Rock which should be accorded a separate landbank, in accordance with the NPPF. Opposes options 3 and 4 because it may be more sustainable to maintain productive capacity within the Plan area, albeit within sensitive designated areas, to ensure the continuation of sufficient supply to markets.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1355	2175	Q22		Preference for Option 2
2197 CPRE (Harrogate)	1073	Q22		Preference for Option 4 working with Options 1 and 2. Closing sites which still have some resource does not benefit the economy.
119 Natural England	0908	Q22		Supports Option 3. This provides longer term protection for the National Parks and AONBs, and score more positively against environmental objectives.
2781 Cromwell Wood Estate Co Ltd	1657	Q22		Preference for Option 2
113 Howardian Hills AONB	1598	Q22		Support Option 3
2210	1812	Q22		Preference for Option 1
120 English Heritage	0303	Q22		Favour Option 1 in combination with Option 3 - There is a considerable concentration of designated and undesignated heritage assets along the southern Magnesian Limestone ridge. These include the Neolithic ritual landscape at Thornborough which is considered to be internationally significant and ranks alongside the monuments of Wessex and Orkney in its potential contribution to our understanding of late Neolithic cosmology and the inter-relationship between architecture and the surrounding landscape. Consequently we would have concerns about the implications which Option 2 and the identification which a separate landbank for this area might have upon the historic environment. Whilst Option 1 may result in higher-quality rock being used for lower-quality end uses, this has to be weighed against the impacts which extraction of Magnesian Limestone might have upon the environmental assets in this part of the Joint Plan area. - Given the extent of reserves of crushed rock within the Joint Plan area and the advice given in national policy guidance, there would seem to be little necessity to identify any landbanks for crushed rock in either the National Park or the AONBs.
116 Ryedale District Council	1168	Q22		Supports the maintenance of landbanks for crushed rock outside protected landscapes and the reflect different types of limestone. (Option 2 and 3.)
1157 W Clifford Watts & Co Ltd	0616	Q23		Option 1 is preferable as would allow the full extraction of permitted crushed rock reserves at Spikers Hill. In addition to the 10 year landbank consideration should be given to providing a contingency to allow for the possibility that sales of crushed rock may increase as a result of growth in economic activity.
1577 Lafarge Tarmac	0963	Q23		Supports the continued production in AONBs where this has sustainability advantages notwithstanding the need to protect valued landscapes

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

1112 RSPB North                                      1721                      Q23                      It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.

115 Minerals Products Association                      1475                      Q23                      The MPA could take a view on a case by case basis for continuing production in AONBs if this has sustainability advantages, notwithstanding the need to protect valued landscapes.

**Policy No:**                      id09

92 Durham County Council                      1793                      For information Durham CC's approach to Mineral Safeguarding is set in Policy 60 of the Pre-submission Local Plan and Appendix D details are also available on the Interactive Proposal Map. The Council would welcome any necessary joint working to ensure that any mineral safeguarding areas within North Yorkshire has regard to the approach taken within the emerging County Durham Plan.  
In relation to the options presented in terms of Option 3, the Council would not support a safeguarding Option which excludes land within environmentally important

1135 Lightwater Quarries Ltd                      0942                      Q24                      Prefer Option 1 as will provide most security to mineral developers.

1157 W Clifford Watts & Co Ltd                      0617                      Q24                      Option 1 and 4 are preferable. Option 1 allows for a 500m buffer zone around the crushed rock reserves, Option 4 would safeguard any additional resources not currently identified where supported by adequate information to demonstrate the presence of the viable resource, this would allow for new resources to be identified and safeguarded.

2781 Cromwell Wood Estate Co Ltd                      1658                      Q24                      Preference for Option 1 and 4

1355    2176                      Q24                      Preference for Option 3

119 Natural England                      0909                      Q24                      Supports Option 3.

116 Ryedale District Council                      1169                      Q24                      Supports Option 1.

2197 CPRE (Harrogate)                      1074                      Q24                      Preference for Option 1.  
Would safeguard a large buffer zone around existing resources.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3013	2000	Q24		Preference for Option 3.
115 Minerals Products Association	1476	Q24		Support Option 1 BGS advice should be followed closely. The 500m buffer is justified. Option 3 - the safeguarding of rock in urban areas would not be necessary if blasting was normally used. It might be possible to rip softer rocks in urban locations so this should be considered. Do not support options 3 and 4 as there is no case for not safeguarding minerals in the National Parks and AONBs
135 FCC Environment	0680	Q24		Preference for option 1 and 4
1577 Lafarge Tarmac	0964	Q24		Preference for Option 1.  Supports close adherence to BGS advice on safeguarding, i.e. 500m buffer. Opposes Options 3 and 4 as they are not in line with national planning policy.
94 Craven District Council	2316	Q24		Option 1 plus Option 3 most appropriate based on BGS survey evidence and local consultation.
74 Selby District Council	1310	Q25		Supports a buffer in order to protect homes and places of work from impacts of quarries/mines. However, a need should be demonstrated within applications for a buffer.
1112 RSPB North	1722	Q25		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
<b>Policy No:</b>		<b>id10</b>		
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0157	Q26		Preference for Option 2 which would identify major sites of strategic importance whilst allowing for the development of smaller ones in areas remote from the main resource blocks so possibly reducing haulage distances and maximising sustainability.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1577 Lafarge Tarmac	0965	Q26		Preference for Option 1.  Most closely reflects NPPF and NPPG which advises the adoption of a hierarchical approach to site adoption i.e. preferable to allocate specific sites, then preferred areas, then areas of search where information is lacking.
2781 Cromwell Wood Estate Co Ltd	1659	Q26		Preference for Option 1
2841 Scarborough, Whitby and Ryedale Green Party	0198	Q26		Preference for Option 1
92 Durham County Council	1794	Q26		Would support both option 1 or Option 2. However it is noted that the justification states that Option 1 would provide the greatest degree of certainty as to where future development may take place and would be in line with national policy.
112 Highways Agency	0423	Q26		Prefer Option 1 and the identification of specific site allocations where possible. This option would provide the greatest degree of certainty as to where future development may take place and would be in line with national policy. This approach will be able to identify the most sustainably assessable sites and assess the potential traffic impacts of these sites and any improvements to transport infrastructure which may be required.
3013	2001	Q26		Preference for Option 1
115 Minerals Products Association	1477	Q26		The NPPF and NPPG advise that a hierarchical approach to site allocations is adopted, this implies that if relevant information is available it is preferable to allocate specific sites, then preferred areas and then areas of search where there is less information. Option 1 is preferred as it most closely accords with national guidance. With Option 2 a small extension may be attached to an important site, the size of the extension/proposal is not necessarily a reliable guide to the strategic nature of the allocation. The option would only be justifiable if no sites came forward from the industry, which is not the case. Need to add a caveat that sites promoted by landowners without supporting information on quality and quantity of reserve should not be favoured over sites with such information, since there is greater certainty that they can be delivered.
2197 CPRE (Harrogate)	1075	Q26		Preference for Option 1 and 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
713 Kirkby Fleetham with Fencote Parish Council	1413	Q26		Option 3 most obvious and flexible, even though it performs negatively in the SA, but sustainability would be considered at the planning stage. SA for options 1 and 2 are misleading as demand for aggregates will continue for the foreseeable future and so there will be a progressive working of sites over the years starting with the most sustainable site. So all potential sites could be worked in the future, so simpler and more sensible to go for Option 3.
119 Natural England	0910	Q26		Favours Option 1 as this will enable a thorough environmental assessment of the plan within the supporting SA and HRA. The identification of site allocations rather than reliance on areas of search complies with national policy.
1577 Lafarge Tarmac	0966	Q27		No views on this matter.
115 Minerals Products Association	1540	Q27		No views to promote.
74 Selby District Council	1312	Q27		Advocates a balanced approach to identify and supply significant additional sand and gravel i.e. don't artificially constrain ability to provide these resources sustainably but equally should not be required to provide these resources at all costs.
713 Kirkby Fleetham with Fencote Parish Council	1414	Q27		This would restrict the development of local sites linked to a specific purpose. Demand for aggregates will continue beyond 2030. To limit development to sites with a particular reserve or output delays the use of 'smaller sites' into the future, some of which may be more appropriate to develop sooner rather than later. Some smaller sites are next to existing workings so it would make sense to utilise these as they would probably have access to already existing processing plants which is a big sustainability gain.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0158	Q27		It is felt that a 5mt reserve threshold and output of 0.25mtpa may be higher than necessary and lower criteria of say 3mt and 0.1mtpa would be more appropriate.
74 Selby District Council	1313	Q28		Supports specific allocations, which are meaningful to residents and businesses, as opposed to areas of search which can lead to uncertainty.
<b>Policy No:</b>	<b>id11</b>			
135 FCC Environment	0681	Q29		Preference for Option 1
2781 Cromwell Wood Estate Co Ltd	1660	Q29		Preference for Option 1

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0159	Q29		Option 1 offers a high degree of flexibility whilst allowing for development in the most sustainable locations.
1577 Lafarge Tarmac	0967	Q29		Preference for Option 1.  In addition, due consideration should be given to whether a separate landbank for building sand should be maintained in accordance with national planning guidance and in recognition of its strategic importance.
2841 Scarborough, Whitby and Ryedale Green Party	0199	Q29		Look at the sustainability appraisal. What it says about consumption of non-renewable resources applies to most of the resources considered in this consultation.
112 Highways Agency	0834	Q29		Generally prefer Option 1 as the identification of specific site allocations should help provide certainty as to the distribution of development and enable its potential impact on the SRN to be identified along with any mitigation measures. Support a criteria based policy alongside this which should encourage a modal shift to more sustainable methods of transport where feasible and should ensure that the sites impact on the SRN would not be detrimental to the safety of the operation.
116 Ryedale District Council	1170	Q29		Preference for Option 1.
115 Minerals Products Association	1478	Q29		There is confusion between identifying strategic and big. If building sand is only used in small quantities, and if not provided means that construction becomes impossible for lack of mortar and there are no alternatives, or alternative materials must be delivered over long distances then this is a strategic issue. Therefore do not agree with analysis and so support Option 1.  If possible should also seek to maintain a separate landbank for building sand as the advice of NPPG is that such treatment is justifiable where distinctly separate markets are apparent.
3013	2002	Q29		Preference for Option 1.
94 Craven District Council	2317	Q29		Option 1 most appropriate given current absence of local evidence.
2197 CPRE (Harrogate)	1076	Q29		Preference for Option 1
119 Natural England	0911	Q29		Supports Option 1. The identification of deliverable allocations within the plan provides confidence that minerals can be extracted without significant environmental harm.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0304	Q29		Given the relatively small amount of building sand likely to be required over the plan period favour Option 1 and the identification of specific allocations (should any suitable ones come forward) and via criteria based policies in line with the environmental and amenity objectives of the Joint Plan.
115 Minerals Products Association	1479	Q30		Combine options 1 and 2 and have Specific Sites if put forward, and also have areas of Search for any shortfall. Criteria on their own should be avoided if not supported by Areas of Search.
1577 Lafarge Tarmac	0968	Q30		It would be preferable to combine Options 1 and 2, i.e. allocate specific sites if put forward and also areas of search for any shortfall.
<b>Policy No:</b>		<b>id12</b>		
1135 Lightwater Quarries Ltd	0943	Q31		Support Option 1 as provides more security to mineral developers. It will also ensure a site specific level of environmental consideration to identify key issues which the MPA would need to be addressed under any planning application.
112 Highways Agency	0424	Q31		Generally prefer Option 1 as the identification of specific site allocations should help provide certainty as to the distribution of development and enable its potential impact on the SRN to be identified along with any mitigation measures. Support a criteria based policy alongside this which should encourage a modal shift to more sustainable methods of transport where feasible and should ensure that the sites impact on the SRN would not be detrimental to the safety of the operation.
1577 Lafarge Tarmac	0969	Q31		Preference for Option 1.  However, do not agree that crushed rock should not be a priority for the Plan. The amount of reserves, their distribution throughout the plan period, the end users they serve and the productive capacity of sites should all be maintained by the Plan. Even when the landbank is exceeded areas of search should be included in the Plan.
116 Ryedale District Council	1068	Q31		Preference for Option 1.
2841 Scarborough, Whitby and Ryedale Green Party	0200	Q31		Look at the sustainability appraisal. What it says about consumption of non-renewable resources applies to most of the resources considered in this consultation.
135 FCC Environment	0682	Q31		Preference for Option 1



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0305	Q31		Have set out in response question 19 and 22 concerns about potential impact which a separate landbank for Magnesian Limestone might have upon the historic environment. Should the plan decide to identify a separate landbank for Magnesian Limestone favour Option 1 because of the certainty which this approach provides and the ability it would provide for a comparison to be made of the merits of alternative
115 Minerals Products Association	1480	Q31		Need to distinguish between big and strategic, the amount of sand may be small but could still be strategic. Do not agree with the analysis that crushed rock should not be a priority for the plan. The plan should ensure that the quantity of reserves, their distribution throughout the plan area, the end uses they serve and productive capacity of sites is maintained. Even if the landbank is above the policy minimum then AoS supported by relevant criteria should be developed and included in the plan.
3013	2003	Q31		Preference for Option 1
128 Yorkshire Wildlife Trust	0748	Q31		Would support Option 1 as it would be possible to consider connecting up grassland when quarry sites were considered.  Magnesian limestone grassland is a very valuable type of grassland found on the Magnesian limestone ridge. Due to competing pressures only small fragments remain. A policy to ensure restoration of Magnesian limestone quarries to grassland could be very effective.
94 Craven District Council	2318	Q31		Option 1 most appropriate given current absence of local evidence.
2197 CPRE (Harrogate)	1077	Q31		Preference for Option 1
119 Natural England	0912	Q31		Option 1 allows for the identification of allocations within the plan which can be assessed through SA and HRA enabling through environmental assessment.
2781 Cromwell Wood Estate Co Ltd	1661	Q31		Preference for Option 2
74 Selby District Council	1314	Q32		Supports specific allocations, which are meaningful to residents and businesses, as opposed to areas of search which can lead to uncertainty.

**Policy No:** id13

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2215 CPRE (Hambleton Branch)	0107			Of the sites put forward in the document for sand and gravel extraction 11 are on established mineral extraction sites with the appropriate infrastructure for removal of extracted minerals already in place. Development of 'greenfield' sites should not take place where provision can be met using existing 'brownfield' sites.  Supports the principle of maintaining landbanks outside of National Parks and AONBs.
94 Craven District Council	2319	Q33		Option 3 most appropriate as there is a need for certainty where possible.
115 Minerals Products Association	1481	Q33		If the Plan is reviewed regularly, as legislation indicates it should, then there should not be a need for this policy. However since the existing Minerals Local Plan has not been reviewed for 17 years it would be sensible to have a policy covering this issue. Do not support any of the policy approaches suggested. In general agree that there should be criteria in the plan to allow unallocated extensions, but would be better for the plan to be regularly reviewed. The choice of language should be chosen carefully. The NPPF sees mineral extraction as a positive benefit for its contribution to economic growth. There is no upper limit to production or landbanks and the need is driven by economic factors. Any extension, whether allocated or not, should be permitted if it meets the broad sustainability criteria of the NPPF and this should form the basis of a policy. Do not support references to 'significantly undermine the potential for a greater total proportion of supply to come from alternatives to primary aggregate' as there should be no conflict between the two categories, and there is already a high take up of secondary minerals. Extensions will usually be promoted when existing reserves are exhausted or very low. This may not always be the case, if a certain grade of mineral is not present in the existing reserve an extension may be able to provide it, or it may be justifiable to provide a better restoration solution. Therefore there should be flexibility in the treatment of the proposal and the justification for it.
116 Ryedale District Council	1171	Q33		Option 2 is considered appropriate to support in principle, the release of unallocated extensions to existing quarries where reserves are not necessary to maintain a landbank of reserve above the minimum required by national and local policy.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0306	Q33		Favour Option 3. This approach would force existing site operators to seek the further expansion of their sites through the Local Plan process (as opposed to being determined through the minerals planning applications). By this means this could help to ensure that the strategic approach to aggregate supply identified in the plan is implemented and give certainty to local communities about where future development is likely to come forward.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0160	Q33		Option 1 allows for the most efficient use of resources and existing plant.
113 Howardian Hills AONB	1599	Q33		No preference as both options rule out extensions within AONBs.
119 Natural England	0913	Q33		Supports Option 2. Windfall extensions should only be permitted where a need is identified. Option 2 may reduce flexibility and therefore hinder delivery, it would not prevent extensions if and when the landbank of permitted reserves fall below policy requirements.
2210	1813	Q33		Preference for Option 3
135 FCC Environment	0683	Q33		Preference for Option 1
2781 Cromwell Wood Estate Co Ltd	1662	Q33		Preference for Option 1
2197 CPRE (Harrogate)	1078	Q33		Support Option 1, 2 and 3
1577 Lafarge Tarmac	0970	Q33		Does not support any of the options. Refers to the MPA response.  If the Plan is reviewed regularly, as legislation indicates, there should be no need for such a policy. However, it is agreed that there should be criteria to allow for extensions. Whether allocated or not, these should be judged against the broad sustainability criteria of the NPPF.
3013	2004	Q33		Preference for Option 3
112 Highways Agency	0425	Q33		No preference. Any significant extension to an existing site should be identified within the Plan so the impact of the extension on existing infrastructure can be appropriately considered at the Plan making stage.
1135 Lightwater Quarries Ltd	0944	Q33		Support Option 1. Option 2 would lead to confusion on implementation of landbank policy

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1568	Q33		<p>The proper 'plan led' approach to guiding all mineral and waste resources requires that the sites are identified in an open and transparent manner, with proper regard to all options known at the time. Options 1 and 2 provide no comfort for the communities and businesses surrounding these sites that the sites will not develop beyond the impacts that they currently endure.</p> <p>Extensions to unallocated sites should not benefit from a policy presumption in favour of their expansion and any proposal to do so should be considered on its merits, with the benefit of full consideration of impacts of the proposal.</p>
128 Yorkshire Wildlife Trust	0749	Q33		<p>Would support a policy that extensions would be allowed only if quarry restorations could be shown to provide major gains for biodiversity and there was security of long term management.</p>
2841 Scarborough, Whitby and Ryedale Green Party	0201	Q33		<p>Option 3. If there are currently unallocated sites which would be suitable for allocation under the new Plan they should be part of the allocation at that time, and if they are not suitable to allocate, they should not be extended.</p>
1157 W Clifford Watts & Co Ltd	0618	Q34		<p>Options 1 and 2 are similar in that they support the principle of extensions to existing quarries where the extension would be consistent with other plan policies relating to the supply of the mineral. Support these options as in principle facilitate the continued working of existing quarries. However object to the part of Options 1 and 2 which state that the option would not apply to sites within the National Park. Spikers Hill is within the National Park and it is proposed that the quarry will re-open.</p>
1112 RSPB North	1783	Q34		<p>It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.</p>
1577 Lafarge Tarmac	0971	Q34		<p>If a proposal, whether it is a new site or an extension, can demonstrate it is equally as good as an allocated site and meets the sustainability criteria of the NPPF, permission should be granted.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0307	Q34		If Option 3 is selected, then the plan might consider allowing small-scale extensions to existing quarries (using clearly-defined parameters for what might constitute 'small-scale') along the lines of the existing policy in the North Yorkshire Minerals Plan. If a policy is included in the plan to permit the expansion of existing quarries outside a National Park or the AONBs, then one of the considerations should be that permission would only be granted if the extension would not compromise the plan's objectives for the protection of the environment and the amenities of local communities.
115 Minerals Products Association	1539	Q34		If a proposal (a new site or extension) can show that it is equally as good as an allocated site and it meets sustainability criteria of NPPF then permission should follow.
74 Selby District Council	1315	Q34		Clearly set out where extraction is and is not appropriate. Phasing and 'Plan B' sites can be incorporated into policy, reducing risk of applications on unallocated sites, reserve sites provide a level of controlled flexibility.
3013	2099	Q35		Yes, policy is needed.
2841 Scarborough, Whitby and Ryedale Green Party	0202	Q35		Yes

**Section: 006: Secondary and Recycled Aggregates**

**Chapter: 5**

**Policy No:**

2956 ***Do Not Consult***Consulted Under 2953***	1976	5.76		Support the use of colliery spoil as a secondary aggregate but do not support the reworking of colliery spoil tips. Option 2 suggests separate facilities for collection and onward sale of secondary aggregate materials.
2954 ***Do Not Consult***Consulted Under 2953***	1935	5.76		Support the use of colliery spoil as a secondary aggregate but do not support the reworking of colliery spoil tips. Option 2 suggests separate facilities for collection and onward sale of secondary aggregate materials.
2953	1961	5.76		Support the use of colliery spoil as a secondary aggregate but do not support the reworking of colliery spoil tips. Option 2 suggests separate facilities for collection and onward sale of secondary aggregate materials.
2955 ***Do Not Consult***Consulted Under 2953***	1947	5.76		Support the use of colliery spoil as a secondary aggregate but do not support the reworking of colliery spoil tips. Option 2 suggests separate facilities for collection and onward sale of secondary aggregate materials.

**Policy No:**                      **id14**

1167	Hambleton Sustainable Development and Planning Policy	1232		Ensure an increase in the re-use of minerals extracted, reducing virgin mineral extraction. Utilise low-carbon building methods and materials, which would reduce demand.
1135	Lightwater Quarries Ltd	0945		The co-location advantage of other operations within mineral workings has not been noted.
968	Womersley Parish Council	0733		support the use of colliery spoil as a secondary aggregate. Do not support the reworking of colliery spoil tips. Option 2 supports separate facilities for collection and onwards sale of secondary aggregate materials.
94	Craven District Council	2320	Q36	Option 1 plus Option 2 preferred.
1577	Lafarge Tarmac	0972	Q36	Supports both options. No reason why the Plan could not promote both.
127	UK Coal Operations Ltd	1939	Q36	Preference for Option 1.
2841	Scarborough, Whitby and Ryedale Green Party	0203	Q36	Both Options 1 and 2
120	English Heritage	0308	Q36	The landscape character of several parts of the National Park is the result of previous extractive and industrial activities. In these areas, the waste from these processes contributes to the distinctive character of the local area. It is important that any proposals for reworking are carefully examined against the potential impact they might have upon those elements which contribute to the special qualities of the National Park.
2781	Cromwell Wood Estate Co Ltd	1663	Q36	Preference for Option 2
419	Scottish and Southern Plc	0894	Q36	Preference for Option 1.  Uncertainty of lifespan for none opted Industrial Emission Directive Sites post 1st January 2016 gives a lifespan of 17000 hours. Option 2 would require significant investment to make it compliant. The separation of elements within PFA to make it a desired product would require significant investment. The existing lagooning systems at Brotherton Ings are lined so excavation from these would be difficult.
128	Yorkshire Wildlife Trust	0750	Q36	Would support the maximum use of recycled materials.
3013		2005	Q36	Preference for Option 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
135 FCC Environment	0684	Q36		Preference for Option 2
1157 W Clifford Watts & Co Ltd	0619	Q36		Prefer Option 2 as it encourages greater use of recycled aggregate. In particular support the use of existing minerals extraction sites as locations for the reception and processing of recycled aggregate.
118 East Riding of Yorkshire Council	1689	Q36		Support both options, promoting the reuse of secondary aggregates could make a significant difference.
116 Ryedale District Council	1172	Q36		Option 1 is supported, subject to development management issues.
2197 CPRE (Harrogate)	1079	Q36		Prefer Option 1 but both acceptable
115 Minerals Products Association	1482	Q36		Both options are desirable and the plan should be able to promote both.
115 Minerals Products Association	1538	Q37		No
127 UK Coal Operations Ltd	1986	Q37		Linking use of spoil at the planning stage to appropriate engineering projects, there are occasions where the application for environmental permits (Environment Agency) are complex and this works against businesses using spoil.
1577 Lafarge Tarmac	0973	Q37		No
115 Minerals Products Association	1483	Q38		Many members have significant interests in secondary and recycled aggregates, the only constraint on their use is the quality of the product and the specifications required. Further development and use will depend on technical innovation. Do not anticipate a large change in the level of use of secondary minerals, but if regulations change this might also change.
1577 Lafarge Tarmac	0974	Q38		No huge change in the level of use of secondary materials envisaged unless the regulations on the quality of the product and specifications change or technical innovations occur. Secondary and recycled aggregates are a fundamental part of the aggregates supply chain.
419 Scottish and Southern Plc	0895	Q38		Without government direction on energy policy, the investment required to comply with the Industrial Emissions Directive could be limited. Worst case scenario is that Ferrybridge Power Station could close by 2023 or sooner.
419 Scottish and Southern Plc	0896	Q39		A stable energy policy which generates an environment for investment in the existing energy plant.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

115 Minerals Products Association                      1484                      Q39                      The options presented represent a good challenging range of measures which are supported.

497 Cridling Stubbs Parish Council                      1356                      Q39                      The reworking of colliery spoil tips is not supported. Option 2 suggests separate facilities for collection and onward sale of secondary aggregates.

**Section:                      007: Silica Sand**

**Chapter:                      5**

**Policy No:**

1140 Sibelco                      1696                      5.77                      Delete the word 'relatively'. Silica sand is undoubtedly a scarce industrial mineral.

1140 Sibelco                      1697                      5.79                      Delete the word 'relatively' as silica sand is definitely a scarce industrial mineral

1140 Sibelco                      1698                      5.82                      Would like the Authorities to provide evidence to support the statement ' Due to the specific properties of the silica sand needed to produce the quality of glass required it is not considered that the suitable resources are currently available within the Joint Plan area.' Silica sand reserves in the area have been used in the glass industry and so this statement is inaccurate.

1140 Sibelco                      1699                      5.84                      Question whether these are the only issues raised as it seems to be one sided.

**Policy No:                      id15**

3013                      2006                      Q40                      Preference for Option 3

3001                      1829                      Q40                      Preference for Option 3

116 Ryedale District Council                      1173                      Q40                      Given that the Burythorpe Quarry has sufficient reserves and planning permission beyond 2030 and that there are specific environmental sensitivities relating to Blubberhouses site, it is considered appropriate that the policy approach should support the principle of continued production at Burythorpe site.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
119 Natural England	0914	Q40		<p>Supports Option 2. Where a less environmentally sensitive alternative exists (in this case Burythorpe,) the plan should not allocate Blubberhouses as this will require mitigation measures to avoid significant harm upon the AONB and SPA,SCA and SSSI.</p> <p>Given the poorer performance against the SA's environmental objectives Option 1 should not be progressed.</p>
1112 RSPB North	1733	Q40		<p>Support the requirement outlined in all three options, for any minerals development at Blubberhouses Quarry to 'be subject to a satisfactory outcome of an Appropriate Assessment under the Habitats Regulations'.</p> <p>Initial preference for Option 2, as stated in the SA, environmental impacts are likely to be reduced in relation to Option 1.</p> <p>Concerned about the potential impacts on the North Pennine Moors SPA, SAC and SSSI and adjacent priority habitats and species from the proposed development at Blubberhouses, and the difficulties involved in mitigating these.</p> <p>Option 1 is the least preferred as it provides principle support for development of Blubberhouses, when it is not yet known whether this can be achieved within the principle of sustainable development or in line with the NPPF and the Habitats Regulations. A full Appropriate Assessment will be needed to ascertain this. A plan containing a policy on the basis of Option 1 could only be considered sound once these assessments had been undertaken and a satisfactory outcome identified.</p>
2841 Scarborough, Whitby and Ryedale Green Party	0204	Q40		Preference for Option 3
134 Nidderdale AONB	1004	Q40		<p>Preference for Option 2.</p> <p>MPAs have an obligation to avoid harm to protected landscapes, and co-operation with neighbouring and more distant authorities to coordinate the planning of industrial minerals is a way of achieving this objective while ensuring that industry has access to continuing supply of raw material.</p> <p>Note the importation of silica sand from Norfolk.</p> <p>The strategic position of Blubberhouses in the national silica sand supply chain is not explained in the MWJP. Unless national need can be established, re-opening Blubberhouses quarry, which would cause harm to the AONB, is contrary to the NPPF (para 116).</p>
2781 Cromwell Wood Estate Co Ltd	1664	Q40		Preference for Option 1

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
128 Yorkshire Wildlife Trust	0751	Q40		Would probably support Option 2.
2197 CPRE (Harrogate)	1080	Q40		Preference for Option 3
2768 Norfolk County Council	0468	Q40		Supports Option 1. Provided that there are satisfactory outcomes to an Appropriate Assessment, the MWJP should develop policies to allow for the continuity of supply of all silica sand grades available in its area, subject to suitable applications. Whilst Paragraph 144 of the NPPF states that where practicable landbanks for non-energy minerals should be outside areas such as AONBs, minerals can only be extracted where they occur.  These views are officer views made without prejudice.
115 Minerals Products Association	1485	Q40		Option 1 most appropriate as follows NPPF
1140 Sibelco	1700	Q40		Support Option 1. Options 2 and 3 appear to conflict with European guidance that 'Natura 2000 areas do not a priori prohibit mineral extraction' and also the NPPF
3001	1830	Q41		The Blubberhouses Quarry lies in Nidderdale AONB and should not be allowed to increase operations as the only means of transport is by road through scenic areas.  The Burythorpe quarry should seek to use the Scarborough rail line which connects to York, reducing carbon emissions. It is in an area valued for its agricultural land and should not be allowed to encroach on this.
330 Harrogate Borough Council	2371	Q42		Option 3 is supported due to the location of silica sand in the Nidderdale AONB
<b>Policy No:</b>				<b>id16</b>
1140 Sibelco	1701	Q42		Support Option 1. Options 2 and 3 appear to conflict with European guidance that 'Natura 2000 areas do not a priori prohibit mineral extraction' and also the NPPF
3013	2007	Q42		Preference for Option 3
119 Natural England	0915	Q42		Preference for Option 3.
116 Ryedale District Council	1088	Q42		Given that silica sand is a scarce mineral, it is considered that in principle, all known resources should be safeguarded although the Council is not best qualified to comment of the technical need for a buffer zone.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1734	Q42		Support statement in Option 3 ' working in these areas are less likely to be acceptable in principle' it is important to emphasise, both in Option 3 and the supporting text, that safeguarding does not create a presumption that resources will be worked.
2781 Cromwell Wood Estate Co Ltd	1665	Q42		Preference for Option 1
2197 CPRE (Harrogate)	1081	Q42		Preference for Option 1
128 Yorkshire Wildlife Trust	0752	Q42		Preference for Option 3 as safeguarding a large area around Blubberhouses quarry could lead to major impacts on the SAC/SPA.
2768 Norfolk County Council	0469	Q42		Supports Option 1. The silica sand resources are relatively small and as such risks of sterilising a significant percentage of resource through a non-mineral development on the boundary are greater than with larger resources. The inclusion of a 500m buffer zone would be appropriate and this is supported by the evidence base BGS report.  This is an officer level view made without prejudice.
115 Minerals Products Association	1486	Q42		Prefer Option 1 as some resources can be worked by blasting. Option 2 unacceptable as object of safeguarding is to protect the resource for future generations, not protect what might be worked in the short term Option 3 is unacceptable as all safeguarding should include areas of environmental designations. Option 4 is desirable

**Section:** 008: Clay

**Chapter:** 5

**Policy No:** id17

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
341 York Handmade Brick Co.	2368			Support national planning policy aim of securing supply to at least 25 years production at each facility and is seeking to gain additional reserves of clay immediately adjacent to the brickworks site. In order to achieve this aim separate representations regarding the allocation of land in the mineral local plan have been made, The Company will submit an application for planning permission to extract clay from this area soon. Over the proposed plan period it may be necessary for the company to import small amounts of additional clay material to blend with existing resources to provide innovative products to the building markets, this is current practice and has enabled the company to develop a range of award ranging products. The company considers that it is necessary to identify specific reserves of clay such as those at Alne as Preferred Areas for clay extraction but support the winning and working of minerals in other areas to 'enable appropriate blends to be made'.
112 Highways Agency	0426	Q44		Prefer Option 1 as this would provide the greatest degree of certainty about where future development may take place, and would enable potential traffic impacts to be assessed and identify if mitigation measures are required.
57 Plasmor Ltd	0832	Q44		Pleased to note the inclusion of Hemingbrough Quarry and Escrick Quarry in this section. Option 1 and Option 2 are preferable as they would allow for continued production of clay at Hemingbrough, extensions to Hemingbrough to provide a 25 year supply and future clay from Escrick. Option 2 allows for the development of new reserves where it is demonstrated that additional reserves are needed to maintain continuity of supply at Heck block making works.
2841 Scarborough, Whitby and Ryedale Green Party	0205	Q44		Preference for Option 1
2197 CPRE (Harrogate)	1082	Q44		Preference for Option 1
3013	2008	Q44		Preference for Option 1
2781 Cromwell Wood Estate Co Ltd	1666	Q44		Preference for Option 2 and 3
128 Yorkshire Wildlife Trust	0753	Q45		A number of areas where clay has been extracted are now very valuable as high quality ponds. By considering habitat connectivity and proximity of new sites to bio diverse ponds the MWJP could make a major contribution to enhancing biodiversity.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
74 Selby District Council	1316	Q45		Support continued supply of clay at Hemingbrough if required. Support in principle extraction of clay from Escrick if need is proven and appropriate against all other planning considerations. Specific details of existing sites required before full position known.

**Policy No:** id18

2781 Cromwell Wood Estate Co Ltd	1667	Q46		Preference for Option 1
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3013	2009	Q46		Preference for Option 2.
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**Policy No:** id19

2197 CPRE (Harrogate)	1083	Q48		Preference for Option 1
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2781 Cromwell Wood Estate Co Ltd	1668	Q48		Preference for Option 1
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57 Plasmor Ltd	0833	Q48		Option 1 and 4 would be preferable. Option 1 allows for a 250m buffer zone around resources. Option 4 would safeguard any additional resources not currently identified.
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3013	2010	Q48		Preference for Option 3.
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3014	1982	Q48		Prefer Option 1
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1112 RSPB North	1723	Q49		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
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**Section:** 009: Building Stone

**Chapter:** 5

**Policy No:** id20

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1569	Q50		A full and proper understanding of the likely demand for these materials in the Joint Plan area is not yet known. This is a significant weakness in the evidence base. Until this is understood it is not possible for the relevant authorities to ensure that the MWJP will be robust and sound in this regard. Option 1 is supported.
113 Howardian Hills AONB	1600	Q50		Support Option 2.
3001	1831	Q50		Preference for Option 1.
134 Nidderdale AONB	1005	Q50		Preference for Option 2. A continuing source of stone to repair and alter vernacular buildings in the AONB is important. The Heritage Lottery Fund supported Upper Nidderdale Landscape Partnership Scheme is actively seeking opportunities to facilitate the re-opening of disused small scale quarries.
3013	2011	Q50		Preference for Option 3
92 Durham County Council	1795	Q50		Would support Option 2, this approach is consistent with the provisions of the Submission County Durham Plan (policies 58 and 59).
120 English Heritage	0309	Q50		Favour Option 2 North Yorkshires rich architectural heritage owes much to the great variety of stones used in its buildings and other structures. It is essential therefore that the plan sets out a framework which will support the delivery of the necessary supplies of a new matching stone which are needed for repair and restoration of the area's heritage assets and for new construction within sensitive areas, given the importance of this resource and the contribution which locally sourced building and roofing stone plays in delivering the Objectives for conserving and enhancing the historic environment which are set out in the various Local Plans in this part of Yorkshire, it is essential that the Minerals and Waste Joint Plan clearly expresses its support for the principle of the continued production of such stone. For the repair and restoration of some heritage assets, it will be essential that the material used comes from the original source of building stone or, where they exist, from a compatible quarry source. Therefore in some cases, the only option will be to reopen a face on a currently-disused or used quarry. We would endorse the caveats which are set out in the justification to Option 2 the extent of any reopened former quarry is likely to be pretty limited. Consequently, we would question the assumption in the Sustainability Appraisal that this option is likely to have 'significant negative effects' on the environment. This Option is likely to result in positive effect for the historic environment of the area.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1487	Q50		Prefer Option 2 as reflects NPPF but have additional comments. Building stone should not just be reserved for the repair market. New build is just as important and the historic market only accounts for 10% of sales, need should not be limited.
94 Craven District Council	2321	Q50		Option 2 may be required.
128 Yorkshire Wildlife Trust	0754	Q50		Preference for Option 1.
119 Natural England	0916	Q50		Option 2 is not supported due to poor performance against SA. Option 1 may reduce supply and therefore indirectly affect the appearance of new developments, with implications for sensitive landscapes. Option 3 provides safeguards that need for specific stone and lack alternative sources will be balanced against potential ecological and landscape impacts.
2197 CPRE (Harrogate)	1085	Q50		Preference for Option 2
116 Ryedale District Council	1174	Q50		It is considered that the policy approach should, in principle, cover options to continue production from existing quarries and to support production from new sites subject to a range of criteria to assess new proposals. Therefore Option 3 is supported.
3014	1983	Q50		Prefer Option 2
2781 Cromwell Wood Estate Co Ltd	1669	Q50		Preference for Option 2
286 Scarborough Borough Council	2393	Q50		Support the extraction of building stone from existing sites and the consideration of new sites on an individual basis as it is important to acknowledge the need to source the appropriate local building stone.
74 Selby District Council	1317	Q51		Supports the use of most sustainable sites, including re-opening of former sites.
115 Minerals Products Association	1537	Q51		No
115 Minerals Products Association	1488	Q52		Agree it would be necessary to demonstrate the nature, quality and quantity of the resource, the market to be served but not the availability of stone at alternative sites. This is because all mineral extraction is economically beneficial and operators should be free to develop markets in competition with others in accordance with the NPPF.
3013	2100	Q52		Yes
<b>Policy No:</b>		<b>id21</b>		

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2779 Pickering Civic Society	0034	Q53		Preference for Option 1
120 English Heritage	0310	Q53		<p>Two issues that need to be considered.</p> <p>Firstly is what approach the Plan should adopt to opening new or extending existing building stone quarries where the stone is being extracted for sale on the open market. Secondly is what approach should be taken to applications which propose reopening former, disused quarries in order to provide a source of building stone to meet a clearly defined need for the repair or restoration of a particular building or structure.</p> <p>- In those cases where stone is being extracted for sale on the open market (i.e. not specifically quarried to meet the needs of a particular building or project), would support an approach which would enable such stone to be provided from anywhere across the Joint Plan area except for the protected landscapes of the National Park and the AONBs.</p> <p>- In the case of reopening of former, currently disused building stone quarries, would favour an approach which would allow such developments to take place anywhere across the Joint Plan area (including within the National Park and the AONBs) where;</p> <ol style="list-style-type: none"> <li>1) this stone is required for the repair or restoration of heritage assets, and</li> <li>2) it can be demonstrated that the quarry is the original source of stone for the structure or it can provide a directly equivalent product which is no longer available from the original source quarry, and</li> <li>3) the scale of any extraction is commensurate with the expected requirements of the development for which it is proposed to be used.</li> </ol>
3013	2013	Q53		Preference for Option 4.
115 Minerals Products Association	1489	Q53		<p>Option 3 only one which makes sense.</p> <p>Options 1 and 2 are not workable as the cost of developing sites, employment and training of specialist workforce and compliance with regulations means it would be impossible to limit intended sales to a small geographical area. Existing small operations operated as a hobby may be able to supply material to such a small area, but for larger operations it would not be feasible.</p> <p>Option 4 might work for some applications such as unworked walling stone, but could not work if the stone had to be moved off site to be cut and shaped.</p>
1157 W Clifford Watts & Co Ltd	0620	Q53		Of the three options presented we consider that Option 2 is preferable as it provides support for the development of . new sites and extensions to existing sites to enable maximum flexibility and will allow operators to respond to market demands.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2781 Cromwell Wood Estate Co Ltd	1670	Q53		Option 3 and 4. Some crushed stone should be considered in the National Park to ensure development in the towns and villages in the park are not placed at a disadvantage due to cost of haulage and carbon footprint.
113 Howardian Hills AONB	1601	Q53		<p>The stone used for wall field wall restoration in the HHAONB is often sourced from within the NYMNPA as it is the nearest geological match available locally, this also applied to a limited extent to stone for houses and other buildings. Whichever option is chosen must enable this to continue.</p> <p>Option 1 does so, as it allows use outside the designated area from which it was extracted, but Option 2 is ambiguous in this respect. If Option 2 is the preferred choice then policy wording should read ' support applications for extraction of building stone from within the Joint Plan area for use only within the Joint Plan area, unless for repair of important designated or undesignated structures elsewhere which rely on this stone. Stone extracted in the National Parks and AONBs would only be used within the designated area from where it is extracted, "unless for the repair of important designated or undesignated structures else where which rely on this stone." If Option 2 is chosen the wording must be revised to be as flexible in relation to the National Park and AONBs as Option 1 currently is.</p> <p>Support Option 4.</p>
2197 CPRE (Harrogate)	1086	Q53		Preference for Option 1
3001	1832	Q53		Preference for Option 2
1157 W Clifford Watts & Co Ltd	0621	Q53		Prefer Option 3 as it does not restrict the distribution of building stone and so accords with the NPPF.
2841 Scarborough, Whitby and Ryedale Green Party	0206	Q53		Preference for Options 2 and 4
119 Natural England	0917	Q53		Supports Option 1 and 2 as they ensure building stone extracted within the National Park and AONBs will be used within these designated landscapes.
94 Craven District Council	2322	Q53		Option 1 takes account of the historic nature of the area but also considers the importance of the scenic beauty of the AONBs and National park.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

116	Ryedale District Council	1094	Q53	The Options presented for the use of building stone are too limited and a combination of those options presented would be favoured. The principle of the use of stone extracted from with the Plan area to be for use solely within the Plan area (unless it is for structures elsewhere which rely on that particular stone). In terms of protected landscapes, extraction should be supported where it is to be used within the designated area that it is extracted from unless it is required for repair of historic assets elsewhere.
3001		1833	Q54	Local building stone is a valuable resource and should be kept for repair of heritage buildings in national parks. Cheaper and more environmentally friendly ways to produce building materials such as from waste products, sustainably from biomass or trees are available. Quarrying requires machinery and heavy transport, all damaging to the environment.
74	Selby District Council	1318	Q54	Building Stone of good quality should not be restricted to local use, however, local priority may be appropriate in order to support local character and reduce distance travelled.
1112	RSPB North	1724	Q54	It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.

**Policy No:**                      **id22**

2779	Pickering Civic Society	0035	Q55	Preference for Option 3
2781	Cromwell Wood Estate Co Ltd	1671	Q55	Preference for Option 3 and 4
94	Craven District Council	2323	Q55	Options 2 plus 3 are preferred.
120	English Heritage	0311	Q55	Favour Option 3 because of the stone resource and the importance of some of the buildings in the Joint Plan area. Also support Option 4 as part of the package of measures for safeguarding building stone. There may still be other currently unidentified quarries which might be found to be the original source of stone used in the construction of a particular historic building.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3013	2014	Q55		Preference for Option 1
115 Minerals Products Association	1490	Q55		It is costly and time consuming to search for new building stone supplies, most sources lie adjacent to existing resources, stone of the appropriate quality might be found in a small part of a formation. Option 1 is the correct approach coupled with Options 3 and 4 as a failsafe. Option 3 is necessary since you indicate that some options might leave existing sites out of the safeguarding regime, which would be against the spirit of safeguarding.
1157 W Clifford Watts & Co Ltd	0622	Q55		Prefer Options 3 and 4. Option 3 would ensure the buffer around existing building stone quarries of 250m. Option would ensure a buffer around additional resources of building stone proposed in the site allocations.
116 Ryedale District Council	1175	Q55		All know active and important former building stone quarries should be safeguarded (Option 1 and Option 3)
2197 CPRE (Harrogate)	1087	Q55		Preference for Option 1
120 English Heritage	0312	Q56		Several Local Plans have adopted an approach which requires those proposing developments which could affect a former building stone quarry to either demonstrate that the stone is no longer viable to quarry or not likely to be needed in the foreseeable future, or in those circumstances where there is likely to be need for that stone, that it is extracted before the development commences.
115 Minerals Products Association	1491	Q58		A common approach should be adopted throughout the plan area.
74 Selby District Council	1319	Q58		Safeguarding should be the same across the whole Plan area but may differ for mineral type/use of the resource. SDC does not propose any sites.

**Section:** 010: Oil & Gas

**Chapter:** 5

**Policy No:**

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2876	0488			Opposed to the extraction of oil and gas. Given the severe consequences of climate change operations designed to increase the available resources of fossil fuels should be opposed. It would not be unreasonable for North Yorkshire to oppose such activities in order to try to give some protection to the historic City of York, which will inevitably suffer more flooding if climate change is not slowed. Given the reluctance of North Yorkshire to allow wind turbines, hopes the council will find it impossible to allow shale gas operations.
2967	1899			Concerned about the extraction of shale gas in the area, and the effect it may have on the land and water supply including chemical pollution and possible subsidence. Properties may be at risk.
2873	2108			<p>The Authorities are happy to accept the word of shale gas industry and their friends in parliament based in London who will not be negatively impacted by the proposed drive for shale gas exploitation in North Yorkshire.</p> <p>I believe that investment in better land management in conjunction with biomass digestion, renewable power generation, geothermal and water source heat pump technology would render the increasingly expensive and dangerous fossil fuel extraction industry obsolete. The energy of the tides along the coastline could be examined to provide a less damaging energy security.</p>
897	0466	Thornton le Dale Parish Council		Concerned about the potential impacts of the infrastructure associated with gas related developments. Opposed to fracking within Thornton le Dale Parish area.
3009	2129			I consider all new fossil fuel extraction methods highly dangerous and hope that criteria will be set to prevent most of them. CO2 emissions must not increase, preserve our water supply and agricultural land, avoid air pollution and subsidence, and protect our landscape which supports tourism.
3004	2119			Oil and gas extraction is devastating for the environment causing pollution in extraction and burning causing climate change. The economic benefits are disputable when considered in comparison to alternative forms of energy generation. Particularly concerned about the potential for pollution by unconventional gas extraction.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2862	2121			<p>None of the sites identified appear to have been earmarked for gas wells but on page 3 of the Issues and Options Consultation Leaflet gas wells are mentioned. Does this mean that some sites identified for other uses may actually be used for fracking?</p> <p>On all counts I would consider that to be a 'showstopper'. No matter how much we need the money and energy our childrens future is more important.</p>
121 Environment Agency	1283			The EA groundwater protection principles and practice document (GP3) states that we will object to all planning applications for Underground Coal Gasification (UCG), coal bed methane (CBM) and shale gas extraction sites within Source Protection Zone 1 (SPZ1). To see maps of the Source Protection Zones in North Yorkshire, and to see GP3.
116 Ryedale District Council	1154			The extent to which processing and generating facilities are located within protected landscapes should be addressed through the major development test. It is not appropriate that this is established as a matter of principle.
250 Dart Energy (Europe) Ltd	0858			The overall theme of the document is positive towards mineral and waste related development, which is supported. However, further clarity in relation to hydrocarbons is needed. Although development of hydrocarbons is unconventional at the current time, it is likely that this form of mineral development will become common place in the future.
2798	0024			Do not allow extraction of gas (shale and other forms). The North Yorkshire environment should not be put at risk.
2145 Petroleum Safety Services Ltd	0784	5.112		Within the plan area not all licences are PEDLs, older licences (EXL - exploration, DL - development and PL_ Production) still exist having not been relinquished since issue.
231	2142	5.112		The Government has announced that new licences will be granted for 2014 and the Strategic Environment Assessment conducted by AMEC proposes that the whole MWJP area be licenced for shale gas exploration.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2240	5.124		<p>The plan does not give enough description of these three technologies and their landscape, social and environmental impacts.</p> <ul style="list-style-type: none"> <li>- UCG is experimental and untried.</li> <li>- Would be unacceptable to allow this method on land and in the Plan area.</li> <li>- CBM wells are typically less deep than shale gas wells and this must be looked at with regard to the overlying aquifer so that fracturing can be ruled out if the lateral arm of the well is less than about 800m below the aquifer.</li> <li>- Both shale gas and CBM may have risks that are beyond mitigation, this should be looked at in detail.</li> </ul>
2145 Petroleum Safety Services Ltd	0790	5.129		<p>Exploration and appraisal in comparison to production, whilst short term, do have a more substantial impact. Infrastructure required for production results generally in less impact save for its initial installation (i.e. pipeline)</p>
231	2145	5.130		<p>The statement in the Plan that there is no evidence of any current commercial interest in North Yorkshire for unconventional gas is not true. Hydraulic fracturing for shale gas has been carried out as part of exploration near Kirby Misperton, planning applications for similar explorations have been received. Exploration licences near York have been traded, so there is commercial interest.</p>
2145 Petroleum Safety Services Ltd	0791	5.131		<p>Support the reference to other regulatory regimes, and suggest that a clear definition of the responsibilities for each regime is provided. This would assist developers and stakeholders understand which organisation regulates and determines specific impacts and/or risks.</p>
2145 Petroleum Safety Services Ltd	0808	Q72		<p>Agree with the approach.</p>
250 Dart Energy (Europe) Ltd	0845	Q72		<p>Agree with this approach.</p>
3013	2021	Q72		<p>Yes.</p>
2917	0537	Q72		<p>No. There are significant risks</p>

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

2762 Third Energy Limited                      1255                      Q72                      Disagree with the approach because  
 - Para 143 NPPF states that MPAs should 'define Mineral Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development'.  
 - Section 2.2 of the BGS report states that 'hydrocarbons have not been considered for mineral safeguarding for the reason that the location of surface infrastructure to access these resources is, considered to some degree, flexible so the resources are not susceptible to the risks posed by sterilisation by other non-mineral development'.  
 Disagree with this statement and considers that it is not always the case that surface locations for hydrocarbons are flexible, given planning, residential and environmental constraints. It is not accepted that the position of surface facilities has any bearing on the sterilisation of sub-surface resources given that the surface facilities are mere conduits for the extracted minerals to come to the surface. This applies to all underground mineral resources such as coal, hydrocarbons and potash.

2991 Envireau Water                      1551                      Q72                      Yes

150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited                      1246                      Q72                      Disagree with the approach because  
 - Para 143 NPPF states that MPAs should 'define Mineral Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development'.  
 - Section 2.2 of the BGS report states that 'hydrocarbons have not been considered for mineral safeguarding for the reason that the location of surface infrastructure to access these resources is, considered to some degree, flexible so the resources are not susceptible to the risks posed by sterilisation by other non-mineral development'.  
 Disagree with this statement and considers that it is not always the case that surface locations for hydrocarbons are flexible, given planning, residential and environmental constraints. It is not accepted that the position of surface facilities has any bearing on the sterilisation of sub-surface resources given that the surface facilities are mere conduits for the extracted minerals to come to the surface. This applies to all underground mineral resources such as coal, hydrocarbons and potash.

1355                      2179                      Q72                      Agree with the approach taken.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

1111	The Coal Authority	0872	Q72	Hydrocarbon resources do not face the same mineral sterilisation issues as other mineral resources and so no need to safeguard conventional or unconventional hydrocarbon resources.
150	Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1247	Q73	<p>As per the BGS minerals safeguarding guidance 2011 particular emphasis is put upon protection of those minerals which are considered 'economically viable' and therefore appropriate for safeguarding without placing a restrictive burden on the local planning authority.</p> <p>Consider that safeguarding large areas of minerals found at levels similar to hydrocarbons could potentially place unnecessary restrictions on operators of hydrocarbon licences in the National Park and hinder hydrocarbon extraction. The three Joint Plan authorities should adopt a more practical approach where the MSA applies to land where there is a clear extraction potential. Wish to see a significant reduction in the safeguarding areas in and around the Cloughton area in order to ensure that hydrocarbon exploration and production is not adversely affected.</p>
2762	Third Energy Limited	1256	Q73	<p>As per the BGS minerals safeguarding guidance 2011 particular emphasis is put upon protection of those minerals which are considered 'economically viable' and therefore appropriate for safeguarding without placing a restrictive burden on the local planning authority.</p> <p>Consider that safeguarding large areas of minerals found at levels similar to hydrocarbons could potentially place unnecessary restrictions on operators of hydrocarbon licences in the National Park and hinder hydrocarbon extraction. The three Joint Plan authorities should adopt a more practical approach where the MSA applies to land where there is a clear extraction potential. Wish to see a significant reduction in the safeguarding areas in and around the development licence area (PL077), known as Ebberston Moor in order to ensure that hydrocarbon exploration and production is not adversely affected.</p>

Policy No:                      id23



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2797	0012			<p>Oppose all forms of hydraulic fracturing (fracking), or processes resembling fracking, concerning shale gas, coal bed methane or underground gasification, setting fire to coal seams to harvest gas. Concerned about impact it will have on air quality, drinking water, health climate change and the landscape.</p> <p>Concerned about the impact fracking has had elsewhere which if not properly regulated leads to groundwater contamination. Conventional licences could be exploited to push the boundaries between conventional and unconventional exploration.</p> <p>There should be a blanket ban on hydraulic fracturing and conventional development.</p>
2876	0490	Q59		Would prefer no operations to be allowed, but failing this would favour Option 1 to keep operations out of the National Parks and AONBs.
2197	CPRE (Harrogate)	1089	Q59	Preference for Option 1
2762	Third Energy Limited	1248	Q59	<p>Prefer Option 2</p> <p>Reject Option 1 as gas exploration and production has taken place in the North York Moors National Park for nearly 50 years with no adverse impact on the special qualities of the National Park. Planning applications have accompanying mitigation measures attached to deal with any potential adverse impacts. Directing gas developments to locations outside the National Park and AONBs is contrary to the NPPF.</p> <p>Support Option 2 as will permit gas development in the National Park, subject to demonstrating exceptional circumstances and public interest.</p> <p>Option 3 largely reflects current policy framework within the NPPF. It is broadly acceptable but requires processing or electricity generating facilities to be located outside the National Parks and AONBs, where viable alternatives exist. However the decision is dependent upon commercial viability rather than on the degree of environmental impacts.</p>
128	Yorkshire Wildlife Trust	0755	Q59	Preference for Option 1.
3003		2122	Q59	<p>Support Option 3.</p> <p>Economic benefit for the National Park.</p>
2145	Petroleum Safety Services Ltd	0785	Q59	Option 2 preferred. Would like to emphasise that through appropriate design and mitigation these types of development can fit within such protected locations.
2779	Pickering Civic Society	0036	Q59	Preference for Option 1

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2981	2282	Q59		Cannot support any of the spatial options for oil and gas. Would like to halt the extraction of further fossil fuels.
231	2143	Q59		Support Option 1
113 Howardian Hills AONB	1602	Q59		Strongly support Option 1. All development except perhaps very small-scale temporary drilling rigs would be considered major development and therefore incompatible with siting within the National Park or Howardian Hills AONB (or in a location to affect their setting). Option 1 includes a qualifying statement at the end, which would permit an operation within the National Park or AONB if the applicant was able to adequately demonstrate that no other viable site was available, whilst NPPF para 116 would allow a major development to be considered if the circumstances were exceptional and it was then proven to be in the public interest.
116 Ryedale District Council	1176	Q59		Supports an approach which does not restrict, in principle, development across the Plan area, provided impacts are mitigated. However the setting and townscape of the City of York should not take precedence over the setting of other historic towns and villages. If this intention is designed to relate to the York greenbelt, the Greenbelt development management policy should be sufficient.
2982 Friends of the Earth	1288	Q59		<p>Do not agree with any of the three options.</p> <p>Granting additional exploration licences for oil and gas in the plan area is in contravention of the NPPF which states that development policy should have an environmental role that "use(s) natural resources prudently...and mitigate(s) and adapt(s) to climate change including moving to a low carbon economy"</p> <p>Allowing potential for further oil and gas development will not assist in moving to a low carbon economy.</p> <p>None of the Options meet the key messages which the SA should be seeking to address which are</p> <ul style="list-style-type: none"> <li>- Recognise and enhance the natural capital provided by natural, semi-natural and managed habitats.</li> <li>- Reduce contribution to climate change</li> <li>- Support a low carbon economy.</li> <li>- Ensure environmental limits are not breached</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1111 The Coal Authority	0866	Q59		<p>Use term 'Conventional and Unconventional Hydrocarbons' instead of Oil and Gas. Cannot support Options 1 and 2.</p> <p>Only support Option 3 as a fall back to Coal Authority's preferred position of a less restrictive policy approach.</p> <p>The NPPF in paragraph 116 sets out the general approach to be taken towards designated areas and any policy approach to be pursued should take due cognisance of that policy together with that set out in paragraph 147.</p> <p>The approved PEDL licenced areas should be shown on a policies map accompanying the local plan.</p>
2992 Friends of the Earth	1620	Q59		<p>Do not agree with any of the three Options presented.</p> <p>Granting additional exploration licences for oil and gas is in contravention of national policy which requires the prudent use of natural resources. Allowing potential for further oil and gas development is hardly applying prudence and does nothing to move towards a low carbon economy.</p>
119 Natural England	0918	Q59		Supports Option 1.
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1239	Q59		<p>Prefer Option 2</p> <p>Reject Option 1 as gas exploration and production has taken place in the North York Moors National Park for nearly 50 years with no adverse impact on the special qualities of the National Park. Planning applications have accompanying mitigation measures attached to deal with any potential adverse impacts. Directing gas developments to locations outside the National Park and AINBs is contrary to the NPPF.</p> <p>Support Option 2 as will permit gas development in the National Park, subject to demonstrating exceptional circumstances and public interest.</p> <p>Option 3 largely reflects current policy framework within the NPPF. It is broadly acceptable but requires processing or electricity generating facilities to be located outside the National Parks and AONBs, where viable alternatives exist. However the decision is dependent upon commercial viability rather than on the degree of environmental impacts.</p>
3006	2233	Q59		Preference for Option 1
1355	2177	Q59		Support Option 1
2609 York Environment Forum	2198	Q59		Option 1 is preferred. However, please see response 2199 (Q60).
1541	2263	Q59		Support Option 1

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2253	2090	Q59		Support Option 1.  Support protecting these areas.
3013	2015	Q59		Preference for Option 1
2991 Envireau Water	1545	Q59		Support Option 2.  Gas production sites are dictated by geology, not landscape. With appropriate mitigation, processing and general facilities can be installed within sensitive areas without significant environmental impact.
362 Harrogate Friends of the Earth	1360	Q59		Do not agree with any of the three Options presented. Granting additional exploration licences for oil and gas is in contravention of national policy which requires the prudent use of natural resources. Allowing potential for further oil and gas development is hardly applying prudence and does nothing to move towards a low carbon economy.
118 East Riding of Yorkshire Council	1690	Q59		Support options 2 and 3. Consider 'high standards of siting, design and mitigation' to be critical and that 'processing or electricity generating facilities' should be sited as carefully as possible.
250 Dart Energy (Europe) Ltd	0840	Q59		Option 2 is supported as it provides the greatest flexibility for appropriate development to take place. However, further clarity should be provided on the description of locations which may impact on the townscape of the historic City of York. The options should be also amended to include the exploration phase and an understanding that development is environmentally acceptable.  Options 1 or 3 are not supported as Option 1 provides a presumption against development in licenced areas (within National Parks and AONBs) regardless of scale, development type, appropriate location and design. As with Option 1, Option 3 provides a presumption against developing the above ground elements of development in National Parks and ANOBs. Minerals can only be worked where they are found, this may result in mineral extraction needing to take place in the National Park or AONBs. This may cause development to potentially be large than necessary by locating processing or electricity generating facilities outside these area which would result in a negative environmental effect

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
922	0004	Q59		<p>Preference for Option 1.</p> <p>Objects to extraction of shale gas due to associated risks to health (caused by pollution of the water supply including radioactive contamination), destruction of the environment (from development in the countryside including transport).</p> <p>Policies should not focus on financial considerations.</p> <p>UK should take account of experiences of other countries, i.e. France, Germany and US.</p> <p>Considers there should be a presumption against the industrialisation of the countryside, particularly the Green Belt, AONBs and National Parks.</p>
2841	0207	Q59	Scarborough, Whitby and Ryedale Green Party	Preference for Option 1
134	1006	Q59	Nidderdale AONB	Preference for Option 1
150	1240	Q60	Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	No, support Option 2 as it recognises the fact that all forms of gas development including processing can be permitted in the National Park.
1112	1725	Q60	RSPB North	It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
2982	0323	Q60	Friends of the Earth	<p>If continue to take fossil fuels out of the ground this will compound the impact of climate change beyond measure. Sustainable development requires that we leave fossil fuels in the ground for future generations to exploit appropriately.</p> <p>The Authorities should consider whether there should be a presumption against additional oil and gas exploration licences in North Yorkshire being granted and there should be a extremely high bar for granting any new licences at all.</p>
74	1320	Q60	Selby District Council	Open to further debate on regulated gas exploration and fracking. Supports a sequential policy ensuring plant infrastructure has minimal visual, social and environmental impact.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1111 The Coal Authority	0865	Q60		The Plan has not considered any option which freely allows the principle of exploration, appraisal and production of conventional and unconventional hydrocarbons across the plan area without encumbrance from the National Park and AONB designations. One PEDL licence lies completely within the National Park and as such any of the options 1,2 and 3 would potentially prejudice the implementation of activity in these areas. Whilst there is some flexibility in the siting of surface plant for hydrocarbon extraction, this has to operate within the realms of operational requirements and commercial implications. Some forms of hydrocarbon extraction can and do take place on a small scale with minimal surface plant and so need not be incompatible with National Park or AONB status.
2992 Friends of the Earth	1621	Q60		<p>Taking more than 20% of our remaining fossil fuel resources from the earth in the next few decades it will compound the impact of climate change beyond measure. Sustainable development (as defined in the NPPF) requires that we leave fossil fuels in the ground for future generations to exploit appropriately.</p> <p>The Authorities should consider where there should be a presumption against additional oil and gas exploration licences in North Yorkshire being granted and that there should be an extremely high bar for granting any new licences at all.</p>
2876	0491	Q60		Would prefer an option which opposes all operations.
2609 York Environment Forum	2199	Q60		Would prefer an option which rejects oil and gas exploration and extraction in the Joint Plan area.
362 Harrogate Friends of the Earth	1361	Q60		<p>Taking more than 20% of our remaining fossil fuel resources from the earth in the next few decades it will compound the impact of climate change beyond measure. Sustainable development (as defined in the NPPF) requires that we leave fossil fuels in the ground for future generations to exploit appropriately.</p> <p>The Authorities should consider where there should be a presumption against additional oil and gas exploration licences in North Yorkshire being granted and that there should be an extremely high bar for granting any new licences at all.</p>
2841 Scarborough, Whitby and Ryedale Green Party	0208	Q60		Is it possible to rule out the development of any new gas wells or processing facilities, on the grounds of mitigating the amount of climate change as there are targets to meet.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3006	2234	Q60		<p>The MPAs should consider unconventional gas and oil separately from conventional gas and oil developments because unconventional gas leads to much bigger land take, water resource use and impact on waste systems.</p> <p>Further Option: Only permit unconventional gas exploration and development in any location :</p> <ul style="list-style-type: none"> <li>- if an agreed pattern of development - number. And spacing of wells compatible with a particular location can be agreed in advance.</li> <li>- if there is a real solution to the treatment and disposal of the predicted volume of contaminated waste water.</li> <li>- if full disclosure or negotiation of chemicals used has been agreed.</li> <li>- if road use and maintenance and financial bond has been agreed</li> <li>- if a financial bond has been agreed for negative effects like acid spills, impact on farms, drop in house prices etc.</li> <li>- if full reclamation is agreed, with a financial bond.</li> </ul> <p>Full reclamation after unconventional gas production is not always possible.</p>
2762	Third Energy Limited	1249	Q60	No, support Option 2 as it recognises the fact that all forms of gas development including processing can be permitted in the National Park.

**Policy No:** id24

2797		0013		<p>Oppose all forms of hydraulic fracturing (fracking), or processes resembling fracking, concerning shale gas, coal bed methane or underground gasification, setting fire to coal seams to harvest gas. Concerned about impact it will have on air quality, drinking water, health climate change and the landscape.</p> <p>There should be a blanket ban on hydraulic fracturing and conventional gas development</p>
362	Harrogate Friends of the Earth	1362	Q61	If gas extraction is to take place in the Plan area then Option 1 would be supported. Stronger wording is needed as the words "support" and "encourage" are weak. Coordination requires determination from all parties.
3013		2016	Q61	Preference for Option 1.
2992	Friends of the Earth	1622	Q61	If gas extraction is to take place in the Plan area then Option 1 would be supported. Stronger wording is needed as the words "support" and "encourage" are weak. Coordination requires determination from all parties.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2841 Scarborough, Whitby and Ryedale Green Party	0209	Q61		Preference for Option 1
2982 Friends of the Earth	0324	Q61		Should additional gas extraction and processing be allowed then support co-ordinated approach of Option 1, although feel no new extraction should be allowed. Consider that stronger language should be used as the words "support" and "encourage" are weak. Co-ordination requires determination from all parties.
250 Dart Energy (Europe) Ltd	0841	Q61		Support option 2. Although the desire for a co-ordinated approach is understood, it is not considered to be a viable option. The environmental benefits of sharing processing facilities has to be weighed against the additional infrastructure required to transport the gas to these facilities.
1541	2264	Q61		Preference for Option 1
113 Howardian Hills AONB	1603	Q61		Preference for Option 1
2981	2283	Q61		If gas extraction is to go ahead, Option 1 is preferred.
2779 Pickering Civic Society	0037	Q61		Preference for Option 1
2609 York Environment Forum	2200	Q61		Option 1 is preferred. However, see comment 2201 (Q63).
2991 Envireau Water	1546	Q61		Support Option 1.
2762 Third Energy Limited	1250	Q61		Prefer Option 2 as it supports the flexibility needed for operators and developers to identify sites for new infrastructure. Where it is commercially viable developers will seek to avoid duplicating the need for new processing infrastructure by co-ordinating efforts. Such a policy could also restrict the options for the local minerals authority in considering alternatives. However, the inclusion of such a policy would not have a significant affect in persuading operators to co-ordinate and approach. Developers will co-ordinate gas processing where it is available and a realistic option. As Option 1 is dependent on viability in any case, it is unlikely to make a difference.
3003	2123	Q61		Support Option 1.  Support a co-ordinated approach.
2253	2091	Q61		Preference for Option 1



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1111 The Coal Authority	0867	Q61		No preference for either option. The plan should remain flexible enough to take account of potential new PEDL licence areas being granted and an expansion of both conventional and unconventional extraction.
2145 Petroleum Safety Services Ltd	0786	Q61		Option 1 preferred.
2876	0492	Q61		Support Option 1. The use of existing infrastructure is preferable.
2197 CPRE (Harrogate)	1090	Q61		Preference for Option 1
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1241	Q61		Prefer Option 2 as it supports the flexibility needed for operators and developers to identify sites for new infrastructure. Where it is commercially viable developers will seek to avoid duplicating the need for new processing infrastructure by co-ordinating efforts. Such a policy could also restrict the options for the local minerals authority in considering alternatives. However, the inclusion of such a policy would not have a significant affect in persuading operators to co-ordinate and approach. Developers will co-ordinate gas processing where it is available and a realistic option. As Option 1 is dependant on viability in any case, it is unlikely to make a difference.
128 Yorkshire Wildlife Trust	0739	Q61		Preference for Option 1
362 Harrogate Friends of the Earth	1363	Q62		The Authorities should consider a presumption against gas extraction in the Plan area.
2876	0493	Q62		No new gas extraction should be allowed.
2992 Friends of the Earth	1623	Q62		The Authorities should consider a presumption against gas extraction in the Plan area.
2982 Friends of the Earth	0325	Q62		If continue to take fossil fuels out of the ground this will compound the impact of climate change beyond measure. Sustainable development requires that we leave fossil fuels in the ground for future generations to exploit appropriately. The Authorities should consider whether there should be a presumption against additional oil and gas exploration licences in North Yorkshire being granted and there should be a extremely high bar for granting any new licences at all.
<b>Policy No:</b>	<b>id25</b>			
113 Howardian Hills AONB	1604			This seems to contradict Option 1 of id23, which seeks to direct all direct all gas developments to outside the National Park and AONBs.
2991 Envireau Water	1547	Q63		Yes

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1111 The Coal Authority	0868	Q63		Supports Option 1, exploration and appraisal dictated by the physical location of the hydrocarbon resource.
2145 Petroleum Safety Services Ltd	0787	Q63		Agree with the option presented, however, for clarity, oil should be mentioned alongside gas in the policy title.
2981	2284	Q63		No
2762 Third Energy Limited	1272	Q63		Agree in part to the Option, please see Q64
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1260	Q63		Agree in part to the Option, please see Q64
2992 Friends of the Earth	1624	Q63		No
2779 Pickering Civic Society	0038	Q63		Yes
2970 Frack Free York	2356	Q63		I do not agree with this option.
2876	0494	Q63		No. Do not agree that development should be supported even if the site minimises adverse impacts.
112 Highways Agency	0427	Q63		No specific comments at this stage but generally supportive of option's requirement to consider transport effects so the impacts are minimised and mitigated where necessary.
2197 CPRE (Harrogate)	1063	Q63		Support Option 1, gives greater flexibility
250 Dart Energy (Europe) Ltd	0842	Q63		Support in principle some of the principals of the option, however landscape and visual impacts of exploration and appraisal activities are temporary and reversible.  Although the need to protect nationally designated areas is recognised, the current wording applies an undefined and unnecessary buffer zone around National Parks and AONBs. It is therefore suggested that the words 'in close proximity [to the National Park]' are excluded from this option. Traditional visual mitigation, such as tree planting would not have time to become effective before the exploration and appraisal operations have ceased and the land restored. This policy should reflect this. Therefore it is suggested that the first sentence be amended to state 'for the purposes of exploration and appraisal of gas (and other hydrocarbons). (where such development...'
2609 York Environment Forum	2201	Q63		How can this be an Option when no alternatives are presented? In as far as there is no other choice, we are forced to accept this is the 'least worst' as it is the only one.
3013	2017	Q63		No

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2982 Friends of the Earth	0326	Q63		No
231	2144	Q63		Gas exploration should be granted only on condition that it complies with a halt on unconventional gas extraction.
3006	2235	Q63		Preference for Option 1
2797	0014	Q63		Oppose all forms of hydraulic fracturing (fracking), or processes resembling fracking, concerning shale gas, coal bed methane or underground gasification, setting fire to coal seams to harvest gas. Concerned about impact it will have on air quality, drinking water, health climate change and the landscape.  There should be a blanket ban on hydraulic fracturing and conventional gas development
362 Harrogate Friends of the Earth	1364	Q63		No
2762 Third Energy Limited	1251	Q64		Suggest that within wording of the policy that 'minimise' is replaced with 'mitigate' It is unnecessary to require particularly high standards of siting, design and mitigation in or close to AONBs and the National Park as this is already covered by the NPPF para 115. The Option also implies that the visual impact of development outside, but close to, the boundary of the National Park is a material consideration, however this is only relevant if the development is actually visible from the Park. This is considered ambiguous and difficult to assess.
3006	2236	Q64		Conventional and unconventional gas and oil should be treated separately. Exploration and appraisal in unconventional gas extraction are two different activities and should be treated separately. The use of fracking in appraisal gives rise to concerns about contaminated water waste, use of the water resource, possible contamination of the aquifer through use of certain chemicals and faulty well construction.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2992 Friends of the Earth	1625	Q64		<p>The NPPF sets a 'presumption in favour of sustainable development'. Disagrees with the presumption as set out in Option 1 because we do not consider oil and gas exploration to be 'sustainable'. A stronger commitment to developing renewable energy sources is essential.</p> <p>In seeking to protect the AONBs and National Parks care should be take to ensure that the rest of the plan area is not left un-guarded and that 'particular high standards' should be applied consistently across the plan area.</p> <p>The length of this option, over 100 words in one sentence, is not a satisfactory basis for consultation.</p>
2981	2285	Q64		No exploration and appraisal of fossil fuels.
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1242	Q64		<p>Suggest that within wording of the policy that 'minimise' is replaced with 'mitigate'</p> <p>It is unnecessary to require particularly high standards of siting, design and mitigation in or close to AONBs and the National Park as this is already covered by the NPPF para 115. The Option also implies that the visual impact of development outside, but close to, the boundary of the National Park is a material consideration, however this is only relevant if the development is actually visible from the Park. This is considered ambiguous and difficult to asses.</p>
2876	0495	Q64		Would favour no developments to be supported at all.
2970 Frack Free York	2357	Q64		I would like the authorities to consider a presumption against exploration and appraisal for unconventional sources of gas (including shale gas, CBM and UCG).
2982 Friends of the Earth	0327	Q64		<p>Disagree with presumption in favour of development, the NPPF states that there should be a presumption in favour of sustainable development. Oil and gas exploration is not sustainable development. A stronger commitment to developing renewable energy sources is essential.</p> <p>In seeking to protect the National Parks and AONB the Authorities should not leave the rest of the county unguarded and that 'particularly high standards' should be applied consistently across the Plan area.</p> <p>Providing one option is not a satisfactory basis for consultation.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2609 York Environment Forum	2202	Q64		id28 presents an Option (2) which would not express support in principle for development of CBM, UCG and Shale gas. Therefore it is inconsistent not to have an option that rejects exploration and appraisal of gas development. Not to do so must de facto undermine option 2 in id28, once exploration and appraisal is permitted, it would be impossible to reject extraction if gas is found. Therefore there should be an equivalent to id28 that does not express support.
362 Harrogate Friends of the Earth	1365	Q64		<p>The NPPF sets a 'presumption in favour of sustainable development'. Disagrees with the presumption as set out in Option 1 because we do not consider oil and gas exploration to be 'sustainable'. A stronger commitment to developing renewable energy sources is essential.</p> <p>In seeking to protect the AONBs and National Parks care should be take to ensure that the rest of the plan area is not left un-guarded and that 'particular high standards' should be applied consistently across the plan area.</p> <p>The length of this option, over 100 words in one sentence, is not a satisfactory basis for consultation.</p>
1112 RSPB North	1726	Q64		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
2841 Scarborough, Whitby and Ryedale Green Party	0210	Q64		Rule out new fossil fuel developments because of climate change
2992 Friends of the Earth	1626	Q65		The option should be consistent with the definition of "sustainable development" within the NPPF.
2970 Frack Free York	2358	Q65		Include the environmental risks associated with exploration for unconventional gas.
2253	2092	Q65		Support Option 1 if just for exploration. Appraisal has different impacts.
2253	2102	Q65		Safeguards necessary to include EIAs, well away from aquifers, outside national parks.
362 Harrogate Friends of the Earth	1366	Q65		The option should be consistent with the definition of "sustainable development" within the NPPF.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2982 Friends of the Earth	0328	Q65		The option should be consistent with the definition of 'sustainable development' in the NPPF
2609 York Environment Forum	2203	Q65		Additional specific criteria should include safety to public health, livestock and wildlife and this should overrule the 'economic benefits'. Any economic benefits must be clearly defined, measured and quantifiable and should apply directly to the joint plan area (income to local people and businesses).
3006	2237	Q65		- Exploration must include 3D seismic reading of the proposed development area to establish a sufficient picture of the geology regarding faults, aquifers etc. - There must be a mandatory EIA before any drilling or planning for development. -A CBM well must not be hydraulically/air fractured if it is not at least 800m or other agreed depth below the aquifer, as the induced fractures can extend up to 600 meters upwards from the horizontal arm of the well. - At this stage there should be options not to support conventional/unconventional gas and oil developments.
2876	0496	Q65		The criteria for lack of support is that gas extraction should not be supported as this increases the amount of fossil fuels available.
2779 Pickering Civic Society	0039	Q65		Absolutely stringent conditions must be imposed to protect water supplies, including indemnity against current and future contamination or over abstraction.
3013	2101	Q65		There must be local communication and consultation and Impact Assessment.

**Policy No:** id26

2797 0015

Oppose all forms of hydraulic fracturing (fracking), or processes resembling fracking, concerning shale gas, coal bed methane or underground gasification, setting fire to coal seams to harvest gas. Concerned about impact it will have on air quality, drinking water, health climate change and the landscape.

There should be a blanket ban on hydraulic fracturing and conventional gas development

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2991 Envireau Water	1548	Q66		<p>Preference for Option 2.</p> <p>However, disagree with the SA judgement that this would have significantly more impact than Option 1 due to the relatively small scale of any site and the potential social impacts that could exist through restricting development to brownfield sites. Viable greenfield sites should be considered on a site-by-site basis.</p>
3006	2238	Q66		<p>Option 1 is preferable to Option 2 but unconventional/conventional gas production should be treated separately.</p>
2982 Friends of the Earth	0329	Q66		<p>Disagree with presumption in favour of development, the NPPF states that there should be a presumption in favour of sustainable development. Oil and gas exploration is not sustainable development. A stronger commitment to developing renewable energy sources is essential.</p> <p>In seeking to protect the National Parks and AONB the Authorities should not leave the rest of the county unguarded and that 'particularly high standards' should be applied consistently across the Plan area.</p>
2253	2093	Q66		<p>Preference for Option 1</p>
113 Howardian Hills AONB	1605	Q66		<p>Preference for Option 1.</p>
2197 CPRE (Harrogate)	1091	Q66		<p>Preference for Option 1</p>
3013	2018	Q66		<p>No. or Option 1.</p>
2992 Friends of the Earth	1627	Q66		<p>Do not consider gas extraction to be sustainable development. There should be a stronger commitment to developing renewable energy sources.</p> <p>In seeking to protect the AONBs and National Parks the Authority should not leave the rest of the County unguarded and that a requirement for 'particular high standards' should be applied consistently across the Plan area.</p>
112 Highways Agency	0428	Q66		<p>No strong preference. Generally support Option 1 over Option 2 as seeks to locate new facilities on brownfield land. Such locations tend to be more sustainable as more accessible for the workforce reducing their need to travel. Support the transporting of gas via pipelines.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2762 Third Energy Limited	1252	Q66		Support Option 2 subject to replacing 'minimise' with 'mitigate' The preference for siting new processing facilities on brownfield industrial or employment land could only be justified if there are areas of such land within relatively close proximity of gas reserves. This issue was discussed at the RUP inquiry in 2011 and referenced to the fact that NYCC were unable to identify any other allocated industrial land within the Vale of Pickering that was both available and suitable.
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1243	Q66		Support Option 2 subject to replacing 'minimise' with 'mitigate'. The preference for siting new processing facilities on brownfield industrial or employment land could only be justified if there are areas of such land within relatively close proximity of gas reserves. This issue was discussed at the RUP inquiry in 2011 and referenced to the fact that NYCC were unable to identify any other allocated industrial land within the Vale of Pickering that was both available and suitable.
2841 Scarborough, Whitby and Ryedale Green Party	0211	Q66		Preference for Option 1 if have any at all
1112 RSPB North	1727	Q66		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
362 Harrogate Friends of the Earth	1367	Q66		Do not consider gas extraction to be sustainable development. There should be a stronger commitment to developing renewable energy sources. In seeking to protect the AONBs and National Parks the Authority should not leave the rest of the County unguarded and that a requirement for 'particular high standards' should be applied consistently across the Plan area.
2609 York Environment Forum	2204	Q66		Of the Options presented Option 1 is preferable.
2145 Petroleum Safety Services Ltd	0788	Q66		Option 2 preferred, oil should be mentioned alongside gas in the policy title.
2779 Pickering Civic Society	0040	Q66		Preference for Option 1
2876	0497	Q66		I do not agree with the option to support development even where it minimises adverse impacts to the environment, unless the minimum impact is no impact at all, due to no development.



Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

2981    2286                      Q66    Do not support gas production and processing but if it is going to take place Option 1 is Preferred.

1111 The Coal Authority                      0869                      Q66    Option 2 should be pursued to allow flexibility.

250 Dart Energy (Europe) Ltd                      0843                      Q66    Option 2 is supported.

The policy should be re-worded to state that "new gas, including hydrocarbons, production and processing facilities".

The boundaries of the National Parks must be maintained and respected. The Phrase "...or in close proximity to ..." should be removed.

Whilst it might be preferable to site processing facilities on brownfield or industrial, or employment land, given the locations of some of the licensed areas this may not be possible without considerable infrastructure being installed to transport the gas. Pipelines, even located under ground, can have considerable environmental effects and need to be balanced carefully. There should be flexibility in the plan to allow schemes with the least environmental effect to be taken forward.

2876    0498                      Q67    The alternative would be to not support any development at all.

3006    2239                      Q67    CCS should be treated separately from the extraction developments as it could be useful for climate mitigation.

At this stage there should be options not to support development.

362 Harrogate Friends of the Earth                      1368                      Q67    The resource should be left in the ground for future generations.

2982 Friends of the Earth                      0330                      Q67    The resource should be left in the ground for future generations

2992 Friends of the Earth                      1628                      Q67    The resource should be left in the ground for future generations.

2841 Scarborough, Whitby and Ryedale Green Party                      0212                      Q67    Would prefer no fossil fuel extraction

**Policy No:**                      [id27](#)

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2797	0016			Oppose all forms of hydraulic fracturing (fracking), or processes resembling fracking, concerning shale gas, coal bed methane or underground gasification, setting fire to coal seams to harvest gas. Concerned about impact it will have on air quality, drinking water, health climate change and the landscape.  There should be a blanket ban on hydraulic fracturing and conventional gas development
2876	0499			Respondent does not object to extraction of Coal Mine Methane. If gas is accumulating in a mine it makes sense to remove it and use it.
2992	1629	Friends of the Earth	Q68	Preference for Option 1.
127	1987	UK Coal Operations Ltd	Q68	Preference for Option 2. Coal mine methane is a resource that should be exploited.
362	1369	Harrogate Friends of the Earth	Q68	Support Option 1.
2982	0331	Friends of the Earth	Q68	Preference for Option 1
2981	2287		Q68	As it is unlikely that there is an option to prevent gas leaking out at all, then a preference for Option 2 is expressed.
2609	2205	York Environment Forum	Q68	Preference for Option 1.
2991	1549	Envireau Water	Q68	Preference for Option 2.
3013	2019		Q68	Preference for Option 1
1111	0870	The Coal Authority	Q68	Support Option 2 to allow flexibility and support paragraph 147 of NPPF. CMM is a form of unconventional hydrocarbon extraction and is a growing sector of energy production, also undertaken to help address mining legacy issues. The Plan should stay flexible so can take account of any new licences being granted by The Coal Authority.
112	0429	Highways Agency	Q68	No preference but supports locating facilities on existing brownfield, industrial or employment land which present the best opportunities for sustainable travel.
2197	1092	CPRE (Harrogate)	Q68	Preference for Option 2
2145	0789	Petroleum Safety Services Ltd	Q68	Option 2, no consideration has been given to greenfield sites where power generation has minimum impact and connection to the National Grid can easily be achieved.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2753 Friends of the Earth - Yorkshire & Humber and the North East	1759	Q68		Preference for Option 2.  Allows capture and use of methane from any active or abandoned mine in a way that minimises methane leakage.
2779 Pickering Civic Society	0041	Q68		Preference for Option 2
1541	2265	Q68		Preference for Option 2.  Better to capture methane than to allow it to escape.
362 Harrogate Friends of the Earth	1370	Q69		No.
2982 Friends of the Earth	0332	Q69		No
74 Selby District Council	1321	Q69		CMM should be permitted where it is the most sustainable option. No restriction in principle, only technical and sustainability constraints should factor. The SDC LP SP17 and para 7.42 supports CMM in principle.

**Policy No:** id28

2857	0284			Object to fracking within the County
2856	0283			Fracking should get the go ahead throughout the Country as a matter of urgency. It will be the single most important thing to benefit the UK economy.
3001	1864			The document was not easy to read, with overly long sentences of 90, often repeated, words.  Fracking was buried in the document alongside CMM and UCG and underground storage and capture of carbon. These four topics are not equal, Fracking is a new technology and Carbon Capture hasn't been attempted yet. It is difficult to answer a questions based on 4 different issues. Fracking should have a separate section.
2917	0538			Leave shale gas and coal in the ground. They contribute to global warming. Shale gas will increase traffic movements through areas that have congestion in summer. Risks to aquifers and surface water.
2876	0489			Concerned about the potential for shale gas operations to lead to ground water contamination.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2964	0634			Does not support shale gas extraction using fracking techniques because of the uncertain nature of the impacts and risks involved.
2805	0057			Opposes Shale gas extraction in the Plan area. Reasons for this include the dangers around fracking and the storage of shale gas resources including potential gas explosions, the risk of fracking causing sink holes, contamination of water resources, pollution to air and water, impacts upon road networks from transporting shale gas and the small number of potential resulting jobs.  Previous mining activities within the Plan area does not justify fracking.
2333	2294	Dringhouses and Woodthorpe Planning Panel		Fracking is going to be a fact of life, the rewards for minor surface disruption are too large for industry to ignore. Lessons should be learnt from the BP oil well at Poole in Dorset which has been established for years and is virtually invisible. Apart from initial exploratory drilling at fracking sites, gas if found will only require a minimal array of structure at the exit point and can then be piped to processing plants in individual areas already in existence. Gas and oil can also be recovered from the North Sea and brought ashore then piped to processing plants, again onshore disruption should be kept to a minimum.
128	0756	Yorkshire Wildlife Trust		Has very serious concerns about shale gas extraction. There are a wide range of issues but impacts on water resources and biodiversity are most vital for the Authorities to consider. (see: <a href="http://wildlifetrusts.org/news/2014/03/12/leading-countryside-groups-join-forces-challenge-fracking-rules">wildlifetrusts.org/news/2014/03/12/leading-countryside-groups-join-forces-challenge-fracking-rules</a> ).
2788	0007			Opposed to fracking due to ground water contamination, low levels of energy production from the process, cost of decontaminating land, disruption to the road network, high demand for water from the extraction process reducing supply to other areas and increasing cost.
2804	0056			Opposes fracking due to uncertain impacts, potential impact upon water resources and international uncertainty

1541		2277	<p>Unconventional processes of extracting oil and gas can severely damage land, water and air. Industry figures reveal that 6% of new wells leak immediately and 50% will leak in the following 30 years. The UN Environmental Program states 'fracking may result in unavoidable environmental impacts even if unconventional gas is extracted properly'.</p> <p>Millions of gallons of water is used in fracking, which is mixed with chemicals (including carcinogenic and those known to cause nervous and immune system disorders). Once in the ground it will absorb radiation from rocks and this toxic sludge will need storing, transporting and treating, whilst some is left in the ground. How will this waste be treated and will people who become ill/farmland contaminated from underground leaks/houses suffer subsidence be compensated.</p> <p>Fracking releases GHGs, contributing hugely towards climate change, detracting from the County and Britain's attempt to meet the Kyoto Protocol. Fracking is a temporary solution to the peak of oil production and we should support environmentally friendly methods of generating energy rather than chasing 'dirty' oil and gas. A progressive target in reduction in carbon emissions should be set.</p>
2609	York Environment Forum	2210	<p>For those that oppose 'fracking', the options as outlined do not provide any choices to register a preference against unconventional gas. It is considered that this is unsafe and will worsen climate change and that shale gas and other forms of unconventional gas extraction should not be included in the MWJP.</p> <p>The concerns about this type of development include:</p> <ul style="list-style-type: none"> <li>-Risk of pollution of groundwater, aquifers and animal and human health.</li> <li>-Traffic issues, congestion, disturbance and damage to infrastructure.</li> <li>-industrialisation of the countryside.</li> <li>- Earth tremors</li> <li>- any potential economic benefit is out weighed by the damage and destruction caused.</li> </ul>
2776	Frack Free North Yorkshire	0641	<p>Request that unconventional gas extraction such as shale gas, CBM and UCG should not be included in the MWJP.</p> <p>Please note there are over 500 followers and members of this group who are 100% against any plans to pursue hydraulic fracturing of shale gas, CBM and UCG in North Yorkshire.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2938	2365			Unconventional gas extraction should be banned. Fracking carries too many risks for the immediate environment and adds to global warming. Concerned about contamination of water and greenhouse emissions. Need to employ the precautionary principle.
2807	0059			Opposes the extraction of Shale Gas within the Joint Plan area and the UK. The reasons for this include potential risks, including pollution of water resources, decreasing demand for energy, ground disruption from drilling and damage to the landscape from unrestored workings.
3008	2114			Fracking has been seen to severely damage land, water and air in other countries. Fracking uses millions of gallons for our precious water mixed with toxic chemical which has the potential to be radioactive once injected into the rocks. The waste water will need to be stored and treated. Concern about health risks from contamination and effects of properties from subsidence. UCG and CBM can cause similar problems.
801 Pickering Town Council	0476			Too little information to choose any of the options provided. The dependency of the country upon foreign supplies for energy was recognised however, concerns regarding the potential impacts of hydraulic fracturing, including pollution of ground water resources, air pollution and wider local amenity issues, were expressed.
2823	2111			There is a large amount of objection relating to the possibility of fracking. Fracking has been used in the international oil and gas industry for years.
2816	0089			Opposed to fracking in North Yorkshire due to the harm it could do to the environment, wildlife, the general public. It could have an adverse effect on tourism. Concerned about the hazardous waste created by fracking and its disposal, as it will contain cacogenic substances which leaches into the soils and water table.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2970 Frack Free York	2361			<p>Unconventional gas exploration and production will have a harmful effect on the environment if allowed by the Authorities. Existing reserves of fossil fuels are sufficient to cause climate change, so the development of additional, unconventional sources of fossil fuels should not be pursued. In the case of unconventional gas production, fugitive emissions of methane may occur so should not be seen as a less harmful source of fossil fuels.</p> <p>Fracking will result in large quantities of hazardous waste water risking pollution of surface and ground water and air pollution due to emission of volatile organic compounds, with CBM leading to contaminated water from dewatering of coal seams. A great strain on the regions road network.</p> <p>Unconventional gas production is not compatible with the Climate Change Act as it is unlikely GHGs will be reduced if these sources of energy are developed. I note that the NPPF gives great weight to the economic benefit of minerals extraction but they must be used sustainably.</p> <p>I believe that there are particular reasons why the Joint Plan area is not suitable for unconventional gas production i.e. good quality agricultural land, prone to flooding, increasing the likelihood of water contamination. The development of unconventional natural gas contradicts CYC Community Strategy and Climate Change Framework.</p>
2876	0487			<p>Concerned about the proposals for shale gas. Considers that is unfair to hide this very important and contentious issue within such a large document. Failure to consult separately on this contentious issue is a deliberate attempt to stifle opposition.</p>
286 Scarborough Borough Council	2400			<p>There is limited commercial interest to date in new technologies for oil and gas extraction (including hydraulic fracturing, 'fracking', in the Plan area, the Borough Council supports a precautionary approach towards the use of these evolving extraction technologies, reserving the right to comment on individual proposals should they arise.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2800	0028			<p>Fracking in the Vale of Pickering would pose the following threats: potential contamination of water supply and aquifers which would impact upon tourism and farming in the area. Increased vehicle movements for transporting waste water to specialist treatment facilities and the associated impacts (noise, pollution, danger and co2 emissions) to local communities.</p> <p>Fracking does nothing to mitigate climate change and delays the development of green energy.</p> <p>Concerned about the lack of regulations and controls over the industry.</p> <p>Concerned about the impact on tourism and fracking could act as a deterrent for people to move into the area.</p>
1033	CTC North Yorkshire	2256		Supports the representation made by York Environment Forum relating to unconventional gas.
2855		0285		<p>Object to the test drilling, production and drilling for shale gas in North Yorkshire. Especially object to licence granted in the area around Hovingham and the Howardian Hills which is designated as an Area of Outstanding Natural Beauty, no industrial development should be permitted there.</p>
1167	Hambleton Sustainable Development and Planning Policy	1224		Sites identified for unconventional gas extraction should be defined in 3D. Fracking sites which intrude on the Plan area underground should fall under the remit of the MWJP.



2932	2245			<p>Unconventional processes of extracting oil and gas can severely damage land, water and air. Industry figures reveal that 6% of new wells leak immediately and 50% will leak in the following 30 years. The UN Environmental Program states 'fracking may result in unavoidable environmental impacts even if unconventional gas is extracted properly'.</p> <p>Millions of gallons of water is used in fracking, which is mixed with chemicals (including carcinogenic and those known to cause nervous and immune system disorders). Once in the ground it will absorb radiation from rocks and this toxic sludge will need storing, transporting and treating, whilst some is left in the ground. How will this waste be treated and will people who become ill/farmland contaminated from underground leaks/houses suffer subsidence be compensated.</p> <p>Job creation is massively inflated and jobs will likely go to people from abroad with specialist knowledge. It would be a damaging act to risk poisoning the land, water and air, and contribute to Climate Change, for this technology. UCG and CBM cause similar problems to fracking. Support sustainable energy forms as oil and gas will not last forever. Nobody will be unaffected by this and it will encourage people to buy food and water from frack-free sources. We need to stand up to big business to stop preventable cancers and immune disorders.</p> <p>Perhaps in the future we will have the technology to do this safely but until then we should place a moratorium on these processes, as has France.</p>
2917	0527	Q70		Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2796	0020	Q70		<p>Support Option 2.</p> <p>Opposes any form of gas extraction due to the uncertain nature of the technology, the known risks to health and safety of nearby residents, air pollution, aquifer contamination, potential earth tremors and impacts on road network, landscape and agricultural land.</p> <p>Suggests no evidence that exploiting this resource will bring long term employment or reduce energy prices and will only increase greenhouse emissions, resulting in the UK missing its obligations of the Climate Change 2008 Act.</p> <p>Supports a sustainable energy future based on 'renewables' and a cautionary approach to any application for gas extraction.</p>
2795	0019	Q70		<p>Support Option 2.</p> <p>Opposes any form of gas extraction due to the uncertain nature of the technology and the known risks to health and safety of nearby residents. Supports a cautionary approach to any application for extraction.</p>
2802	0030	Q70		<p>75% of all fossil fuels should be left in the ground. Extraction of fossil fuels will lead to an increase in CO2 levels. It is the Council's responsibility to preserve the water supply and avoid air pollution. CCS is not workable in practice. Invest in sustainable energy. Fracking, UCG and Coal mining should be rejected.</p>
2989	1985	Q70		<p>Do not support development of shale gas extraction in the three areas under consideration. Concerned about the adverse impact it may have on the environment.</p>
1111	0871	Q70	The Coal Authority	<p>Support Option 1 as will allow flexibility to take account of new licences being granted. Any policy approach should reflect advice in the NPPF and NPPG.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
231	2146	Q70		<p>Appears to be an error - Option 3 is described as 'an expansion to the precautionary principle in Option 1' but it is actually Option 2 which more closely follows the precautionary principle by not supporting the principle of fracking, CBM or UCG. Assuming this is the case would support strengthening of Option 3 with the inclusion of a moratorium on these systems of unconventional gas extraction. All three pose a risk to groundwater and are very carbon intensive for small amounts of fuel. The moratorium should remain in place until legislative framework is created that guarantees the long-term monitoring, maintenance and decommissioning of wells, a safe method of waste water treatment is identified and a method is established which will capture emissions.</p> <p>Sites identified for unconventional gas extraction should be defined in three dimensions, expanding the site to include areas horizontally drilled underground. Fracking sites which intrude onto the Plan area underground should therefore come under the remit of the plan.</p> <p>Do not oppose CCS but it has not been demonstrated on any useful scale.</p>
2876	0500	Q70		Option 2. But would prefer an option to oppose all CBM, UCG and shale gas operations.
2874	0570	Q70		Preference for Option 1 and Option 3.
330 Harrogate Borough Council	2372	Q70		Support Option 3 as reflects Government guidance but extends this to protect potentially sensitive areas.
2808	0060	Q70		<p>Support Option 2.</p> <p>Opposes CBM, UCG and Shale Gas extraction in the UK due to cost, potential pollution, high water requirements and the fact it is untested in densely populated areas. Supports the reduction of fuel use and the development of sustainable energy sources</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
922	0003	Q70		<p>Preference for Option 2.</p> <p>Objects to extraction of shale gas due to associated risks to health (caused by pollution of the water supply including radioactive contamination), destruction of the environment (from development in the countryside including transport).</p> <p>Policies should not focus on financial considerations.</p> <p>UK should take account of experiences of other countries, i.e. France, Germany and US.</p> <p>Considers there should be a presumption against the industrialisation of the countryside, particularly the Green Belt, AONBs and National Parks.</p>
2806	0058	Q70		<p>Support Option 2.</p> <p>The use of chemicals which are potentially damaging to the environment should not be allowed. The encouragement to extract gas is a backwards step when we should be reducing pollution and other potential damaging effects.</p>
2905	1400	Q70		<p>Supports Option 2.</p> <p>Shale Gas is unnecessary, the precautionary principle should apply.</p>
362	Harrogate Friends of the Earth	1371	Q70	<p>There should be separate options for each of the methods. It is impossible to commit to any of the three Options presented.</p> <p>Unconventional gas development in the Plan area is in contravention to the NPPF as extraction of Unconventional gas would not be a prudent use of natural resources.</p>
2987	2292	Q70		<p>Support Option 1 plus Option 3.</p> <p>Until the effects of the process are more readily understood and evidenced CBM, UCG or shale gas exploration using fracking should go ahead. The precautionary approach should be followed as the process have the potential to cause environmental damage to water, land and air. Would prefer for no fossil fuel exploration but it is not possible due to government policies.</p>
2801	0029	Q70		<p>Support Option 2 due to concerns already expressed by local residents on the methods of shale gas extraction and the potential risks this may bring.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2794	0018	Q70		<p>Support Option 2.</p> <p>The risks of local water supply pollution, earth tremors and environmental damage of using toxic chemicals to extract shale gas, has to be weighed against the financial advantages.</p> <p>Fracking has been banned in other countries and Britain does not have regulations specific to fracking, they are 25 years old and designed for offshore drilling. Unregulated fracking poses serious dangers to Yorkshire. The Environment Agency will struggle to monitor abandoned wells.</p> <p>A second response was received 04/4/14 reiterating support for Option 2</p>
2981	2288	Q70		<p>If a choice has to be made then a combination of Option 1 and 3, using the Precautionary Principle to effectively say no to any unconventional gas planning applications for exploration or extraction.</p> <p>Would prefer not to support CBM, UCG or shale gas extraction. If CCS works this is acceptable.</p>
2991	Envireau Water	1550	Q70	Preference for Option 1.
250	Dart Energy (Europe) Ltd	0844	Q70	<p>Option 1 is supported. However the deletion of the phrase 'particular high standards of design' would be welcomed given the limited opportunities to alter design in relation to Plant and machinery that would be in operation. The boundaries of the National Park and AONBs should be maintained and respected. The phrase "... or in close proximity to..." should be removed to prevent what is effectively outward creep of these boundaries.</p> <p>Option 2 contradicts itself. Initially it does not support the development of CBM, whilst in the second part it infers support by reference to the NPPF.</p>
2951	***Do Not Consult*** Consulted Under 2874***	0625	Q70	Prefer Option 1 with Option 3

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2753 Friends of the Earth - Yorkshire & Humber and the North East	1760	Q70		Support a precautionary approach to CBM and shale gas extraction but not for UCG, which has no adequate guidance, or Carbon or Gas Storage which require a separate policy.  Elements of Option 1 and 3 are supported but do not go far enough, however: a precautionary approach should be taken to climate change; mineral site boundaries should be defined in 3D to account for directional drilling; require EIA based on below and above ground; include air pollution and traffic should be included in amenity issues.
2145 Petroleum Safety Services Ltd	0792	Q70		Option 3 preferred.
623 Hovingham & Scackleton Parish Council	0066	Q70		Do not support the principle of shale gas development in Ryedale because of the uncertain nature of the impacts and risks involved.
3011	0741	Q70		Preference for Option 2.
2925	1880	Q70		Preference for Option 2
116 Ryedale District Council	1177	Q70		On the face of it, a policy which embeds the use of a precautionary approach is not unreasonable. However, there is concern that such an approach relies on the basis that the impacts of the process can be accurately identified. Until such a time as the effects of the process are more readily understood and evidenced, the MWJP should not support the process in principle. The Plan should be 'future proofed' in terms of gas extraction should terminology change or new technological process are designed to extract gas from unconventional sources.
2762 Third Energy Limited	1253	Q70		Support Option 1 as it reflects the relatively supportive stance taken in the recently issued Government guidance on development of gas resources. Suggest that a more criteria based policy approach is adopted and as such direct implications for energy mineral development to consult the local list and contain sufficient information to adequately assess the environmental implications of the proposal.
2609 York Environment Forum	2206	Q70		Option 1 and Option 3 presents a preferable combination, from the options presented. This does not mean necessarily that they are preferred, rather that they present the 'least worse' scenario ( comment 2207, Q71 and 2210)  CCS should be a separate issue with separate options.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2787	0005	Q70		<p>Preference for Option 2.</p> <p>Because it does not express any support in principle for shale gas extraction. Concerned about the negative impact of possible shale gas extraction by 'fracking'. In particular the contamination of the water supply, which is understood to be from a borehole at Keld Head for the Pickering area. Need to ensure that the local geological strata will not be porous to any gas or 'fracking' chemicals.</p>
2779 Pickering Civic Society	0042	Q70		<p>Preference for Option 2</p>
2965	0635	Q70		<p>Supports option 1 in combination with option 3.</p> <p>The precautionary principle should be applied, but option 3 does not go far enough. Hydraulic fracturing and Underground Coal Gasification pose too great a threat to ground water and are too carbon-intensive to be supported by the MWJP. The MWJP should oppose unconventional gas extraction within the Plan area. Sites identified for unconventional gas extraction should be defined in three dimensions, expanding the site to include areas horizontally drilled underground. Fracking sites which intrude on the Plan area underground should therefore come under the remit of the Plan.</p> <p>Until the effects of the process are more readily understood and evidenced unconventional gas extraction should not go ahead. These processes have the potential to cause immense environmental damage to water, land and air and the precautionary principle should be applied.</p> <p>A preference for no fossil fuel extraction would be supported however, it is understood that this is not possible.</p>
2841 Scarborough, Whitby and Ryedale Green Party	0213	Q70		<p>Options 1 and 3 as this is the best way of controlling such proposals. All new fossil fuel extraction methods are highly dangerous so criteria should be set so as to prevent most of them. They will increase CO2 emissions, could damage the water supply and agricultural land. Could cause air pollution and possible subsidence. The landscape could be affected which would affect tourism.</p> <p>CCS should not be grouped together with new extraction technologies, as if a method of CCS is found it could be useful in mitigating against climate change.</p> <p>Prefer no support for new fossil fuel technologies but this is not possible with current Government policies.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3004	2115	Q70		Preference for option 1 with option 3 but this does not go far enough in safe-guarding the quality of our land, water and air.
2995	2112	Q70		<p>Until the effects of the process are more readily understood and evidenced CBM, UCG and shale gas exploration using fracking should not go ahead. The precautionary approach should be followed as these processes have the potential to cause immense environmental damage to our water, land and air.</p> <p>Fossil fuels in any shape or form contribute to climate change, move towards green sustainable energy.</p> <p>Fracking uses millions of gallons of our precious fresh water, which is mixed with chemicals with health risks. Consideration would need to be given to how this waste water would be treated.</p> <p>Would people be compensated as a result of subsidence of properties, illnesses from contaminated land and air.</p>
2803	0031	Q70		<p>Preference for Option 3. In fact none of the options are acceptable. The IPCC and IEA say that to stay below 2C we can only burn 700gt coal before 2050. Present reserves are 2,860gt, that means 75% of those reserves need to stay underground. We do not need any more fossil fuels.</p> <p>The Council should follow other Councils and reject fracking and divest from any investments in fossil fuel.</p>
2997	1819	Q70		Support Option 1 in combination with Option 3.
2970 Frack Free York	2359	Q70		<p>Preference for Option 2.</p> <p>Opposed to all unconventional gas production because it is not compatible with existing legislation or local policy</p>
1022 Constructive Individuals	0184	Q70		Preference for Option 2.
2875	2133	Q70		<p>Do not support fracking in the UK.</p> <p>Concerned about potential impact on the landscape, water supplies and climate change.</p> <p>.</p>
3000	1807	Q70		Preference for Option 2



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2786	0001	Q70		Preference for Option 2.  Because, notwithstanding any precautionary and regulatory controls - this takes a stronger stance against fracking by not expressing any support in principle.
3020	1928	Q70		Support Option 2, shale gas is unnecessary so a precautionary principle should apply.
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1244	Q70		Support Option 1 as it reflects the relatively supportive stance taken in the recently issued Government guidance on development of gas resources. Suggest that a more criteria based policy approach is adopted and as such direct implications for energy mineral development to consult the local list and contain sufficient information to adequately assess the environmental implications of the proposal.
1355	2178	Q70		Preference for Option 1
112 Highways Agency	0430	Q70		No preference but supports transportation of gas or carbon via pipeline rather than road.
3007	1867	Q70		Do not support the principle of shale gas development in Ryedale due to uncertain nature of the impacts and risks involved. It should not be extracted in the AONBs.
3008	2113	Q70		Option 1 in combination of Option 3 is supported. Until the effects of the process are more readily understood and evidenced CBM, UCG and shale gas exploration should not go ahead. The precautionary approach should be followed as these processes have the potential to cause immense environmental damage to our water, land air. Would prefer to opt for no new fossil fuel exploration.
2952	0628	Q70		Not in favour of Option 3, but it can be improved with the insistence of a full environmental assessment. The precautionary principle must always be paramount and reference made to the water environment.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2843	0272	Q70		<p>Support Option 1.</p> <p>Britain should develop unconventional sources of gas to reduce the reliance on obtaining gas from abroad. There are resources of unconventional gas available. Fracking is an established technique and the environmental and worker safety hazards are well known and easily managed, there would be huge economic and social benefits. The risk to surface waters and ground water aquifers is negligible and easily managed. Modern drilling techniques means wellhead locations can be located several miles from the underground fracture zone, meaning surface infrastructure can avoid ecologically important lands or urban areas. The chemicals used during the process would typically be found under the kitchen sink, no are not dangerous if used properly. The use of shale gas and coal seam gas create the opportunity for clean burning, low-emission electricity generation when compared to coal power stations. The surface land take for shale gas and coal seam gas is very small, the wells are unobtrusive and not particularly noisy. All things being equal the price paid for electricity resulting from 'gas to power' projects should become cheaper following exploitation of unconventional sources of natural gas. It is in everyone's interests to develop the unconventional gas resources using fracking, communities and parishes should band together to maximise pay-outs coming to the local community. The environmental risk is negligible and easy to manage, on the upside social, economic and political benefits are great and the development would be sustainable.</p>
1112 RSPB North	1735	Q70		<p>Aware large areas within the Plan area have been licenced for or put forward for licencing for shale gas extraction (fracking). There is a large level of uncertainty regarding impacts on groundwater and the environment from fracking. The Government are encouraging fracking based on existing regulation with no additional safeguards.</p> <p>Local authorities have an important role in providing local knowledge and guidance and developing local policy to ensure that developments are sustainable and appropriately located.</p> <p>Initial preference for Option 3 (which incorporates Option 1) as this would help to ensure that damage to sensitive areas and protected sites is avoided.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2932	2244	Q70		Support Option 1 and 3.  I would prefer to opt for no new fossil fuel exploration but understand that this is impossible due to government policies. However, until the effects of the process are understood I do not think CBM, UCG or shale gas extraction should go ahead. The precautionary approach should be followed as these processes have the potential to damage water, land and air.
2937	1613	Q70		Option 3 does not go far enough. The processes pose a threat to groundwater. Should have an Option 4 to oppose all unconventional gas extraction in the Plan area. Any sites outside the Plan area identified for unconventional gas extraction should be identified as they could potentially impact on the Plan area
2811	0065	Q70		Preference for Option 2 Would prefer that the exploitation of shale gas, CBM and UCG is not allowed. There are too many dangers in terms of water pollution, traffic disruption, earth quakes and climate change that cannot lightly be disregarded in pursuit of economic gain. The impact on tourism and agriculture would be devastating.
3012	1954	Q70		Preference for Option 2.
113	Howardian Hills AONB	1606	Q70	Support Option 2, as this allows proposals to be put forward and then assessed against other MWJP and national policies.
3003	2124	Q70		Preference for Option 1.  Economic benefit for the National Park and its residents
2992	Friends of the Earth	1630	Q70	There should be separate options for each of the methods. It is impossible to commit to any of the three Options presented.  Unconventional gas development in the Plan area is in contravention to the NPPF as extraction of Unconventional gas would not be a prudent use of natural resources.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1541	2266	Q70		<p>Support Option 2.</p> <p>Strongly urge the Councils to reject CBM, UCG and Shale Gas exploration as these processes have caused environmental damage in USA, poisoning water courses and wildlife, with at least seven people dying of fracking related explosions.</p> <p>Support investment into Carbon capture storage of CO2 from Power Stations.</p>
2949	0610	Q70		Support Option 2, but totally opposed to fracking due to the dangers and long term problems it poses. There are alternatives available.
2982 Friends of the Earth	0506	Q70		There should be separate options for each of the methods so it is not possible to commit to any of the options proposed.
2790	0011	Q70		<p>Support Option 2.</p> <p>Concerned about the development of unconventional gas extraction, particularly shale gas in Ryedale and the surrounding area.</p>
2934	2213	Q70		<p>Support Options 1 and 3.</p> <p>This is the best way to control such proposals. I would prefer not support for fossil fuel extraction but understand that this is impossible with current Government policies. All new fossil fuel extraction methods are dangerous and criteria should be set to prevent them. Water supplies, agricultural land and the landscape should be preserved and we must limit CO2 emissions, air pollution and subsidence.</p> <p>Carbon capture and storage should not be included in the same policy as new extraction technologies, as it could mitigate climate change.</p>
286 Scarborough Borough Council	2394	Q70		Support Option 3 endorsed. Request further consultation on future proposals reserving the rights to consider any impacts of development on a site by site basis as a consultee.
3013	2020	Q70		Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3009	2128	Q70		<p>Option 3.</p> <p>Provides the Council with more control but doesn't go far enough and would benefit from greater restrictions.</p> <p>Opposed to fracking. Deeply concerned about the significant damage to the local area from hydraulic fracturing, CBM and other unconventional oil and gas extraction i.e. contamination to aquifers, high water usage, conflict with other water users and the production of large volumes of highly contaminated water requiring disposal.</p>
3006	2241	Q70		<p>Option 2 is attractive as it would be good to have an option of not supporting unconventional gas extraction in this area.</p> <p>- It has to be rejected as it lays the MPAs open to potentially much less rigorous approach by national government than is acceptable to the MPA. The MPAs need to have a rigorous framework of regulation and limitation in place based on sound factual and technical information.</p> <p>- The MPAs must have a fully consequent approach to all issues. Unconventional gas developments run counter to the vision and objectives of the plan.</p> <p>Option 1 and 3 are preferable as they give the MPAs the opportunity and responsibility to craft a strategic and regulatory plan tailored to this area that is crammed with high value landscapes and locations.</p>
2253	2094	Q70		<p>Preference for Option 3.</p> <p>Initially preferred Option 2 but this is controlled by changes in national policy.</p>
2776	0632	Q70	Frack Free North Yorkshire	<p>Option 3.</p> <p>These forms of unconventional gas extraction are damaging to the environment and human health and will have a negative economic impact upon the community.</p>
2980	1897	Q70		<p>Support option 1 in combination with Option 3.</p> <p>Do not believe it is safe to extract shale gas in Yorkshire.</p>
2988	0862	Q70		<p>Preference for Option 2.</p> <p>In meeting the sustainability objective of reducing climate change fossil fuels should remain underground. In respect of Underground Storage of Carbon I support Option 3</p>
2197	1093	Q70	CPRE (Harrogate)	<p>Preference for Option 3</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
362 Harrogate Friends of the Earth	1372	Q71		<p>Oppose unconventional gas exploitation, in particular shale gas. The risk to water supplies- surface and aquifers- is to high and would be irreversible. The quantities of water required and the storage/disposal of contaminated water will prove unmanageable. Contaminants cannot be predicted but would include radio active particles. Farmland and amenity land would be despoiled. There would be traffic impacts. Methane would be released into the atmosphere, seismic effects cannot be predicted.</p> <p>An alternative would be to invest heavily in renewables (wave and tidal which are constant) and in energy storage.</p>
150 Barton Willmore LLP on behalf of Egdon Resources (UK) Limited	1245	Q71		<p>Suggest that a criteria-based policy is adopted which seeks to ensure that activities related to the exploration, appraisal and production of oil and gas and unconventional hydrocarbons take place in an environmentally acceptable manner. Therefore suggest following policy wording 'Planning permission will be granted fro exploration, appraisal or production of oil and gas and unconventional hydrocarbons provided they do not result in any significant adverse impacts on local communities or the environment,</p>
2968 York Green Party	2302	Q71		<p>The precautionary principle should be employed, but option 3 does not go far enough. Hydraulic fracturing and UCG pose too great a threat to groundwater and are too carbon-intensive to be supported by the MWJP.</p> <p>The MWJP should oppose unconventional gas extraction. Proposed sites should be defined in 3D, to include underground areas horizontally drilled. Fracking sites which intrude on the Plan area underground should come under the remit of the Plan.</p>
2197 CPRE (Harrogate)	1095	Q71		Agree with approach as complies with national guidance.
2810	0064	Q71		Fracking should not be allowed in the plan area
2952	0629	Q71		Need to address the full impact of climate change and its implications and seek to minimise wherever possible
2253	2103	Q71		I do not want any exploitation of unconventional gas. I would prefer the groupings in this section to be split up, certainly Carbon Storage would be in a separate category.
2809	0063	Q71		Shale gas extraction should not be allowed near built up areas if at all.
2841 Scarborough, Whitby and Ryedale Green Party	0214	Q71		The authorities should consider alternatives

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2917	0539	Q71		Leave in the ground.
3000	1808	Q71		Opposed to fracking, due to: unknown risks involved; lack of level of analysis from government or its agencies to confidently allow fracking; too much focus upon the monetary gain by MPAs; leaking of frack sites in other countries; intensive water use and water table contamination; risk of companies becoming bankrupt leaving the sites to pollute; examples of fracking in other countries is undertaken in sparse areas, not possible in the UK; long term impacts as yet unknown; lack of safety assurances; earthquake risk; impact upon the landscape of the National Parks; disposal method of the toxic waste water; Environment Agency or Health and Safety Executive do not have the resources or expertise to monitor the sites adequately; other countries refusing to allow fracking; house and health insurance increases near to fracking sites; no absolute guarantee of safety.
3001	1866	Q71		Don't allow Government to submit us to fracking because of pressure from a gas supplier. Instead bring on stream renewable energy sources and recycle what we already have.
3006	2242	Q71		The MPAs should include an option not to support exploration and development of unconventional gas developments for the following reasons - waste water treatment and disposal seems currently technically insuperable. - the demand on water resources and the risk of groundwater pollution in the area where the aquifers are currently over-abstracted and already polluted is prohibitive. - in the Plan area it may be impossible to agree the land take, siting and spacing of developed gas fields in a way that still offers the extracting company a viable proposition. - the economic costs may very likely outrun the economic benefits.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1736	Q71		<p>This type of development should be excluded from statutory designated sites due to the large demand it places on the water environment, (many protected sites within the area are water dependant), the need for significant amounts of above ground infrastructure at regular intervals, and uncertainties regarding potential adverse impacts.</p> <p>Concerned that wide exploitation of shale gas will further lock the UK into fossil fuel dependency and severely threaten climate change adaptation and emissions targets. Climate change is the is the single biggest threat to UK wildlife and people. It is important that development policies deliver sustainable development that is compatible with climate change adaptation and mitigation.</p> <p>In addition to the proposed options and policy content it is essential that planning authorities fully consider and address issues in terms of climate change targets and policy, and any new policy is compatible and in line with national ones.</p>
2788	0025	Q71		<p>Concern about the harmful effect of fracking, including water usage and contamination, pollution, potential to cause earthquakes and the impact upon local communities. Recommends that the plan should presume a policy in favour of renewable energy instead of shale gas.</p>
3009	2130	Q71		<p>Carbon Capture and Storage should not be included with the new extraction technologies. If a sure method of CCS was found this would help mitigate against climate change.</p>
2982 Friends of the Earth	1394	Q71		<p>Oppose to unconventional gas exploitation, especially shale gas. Risk to water supplies is high. High risk of contamination and not sure what contaminants will be. Shale sites will not co-inside with brownfield and industrial locations so agricultural land and amenity land will be impacted upon. There will be an increase in HGVs on congested roads. Will impact on climate change and concerned about seismic effects of shale gas. Alternative is to invest in renewables, energy storage, in national management of damping down non-essential demand at peaks, cutting out waste and maximising energy efficiency and carbon storage.</p>
2966 Green Party	1557	Q71		<p>The precautionary principle should be employed but Option 3 does not go far enough. Fracking and UCG pose too great a threat to groundwater and are too carbon-intensive. Oppose UCG within the Plan area. Fracking sites which intrude on the Plan area underground must come within the remit of the Plan.</p>
74 Selby District Council	1322	Q71		<p>Mindful of deep coal mining legacy e.g. land instability. Fracking policies need to consider this.</p>



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2779 Pickering Civic Society	0043	Q71		Notwithstanding 'Government' policy is that the planning system should not seek to duplicate controls implemented by other agencies' The planning authority should in every case scrutinise such external controls closely to ensure that they provide strict and transparent environmental oversight in line with its own consultations. There should be robust opposition to any imposed control that is judged to be inadequate.
2876	0501	Q71		Oppose all CBM, UCG and shale gas. These operations are very environmentally damaging, and should be opposed. Arguably carbon storage could be beneficial and any proposals should be considered on its merits.
1167 Hambleton Sustainable Development and Planning Policy	1223	Q71		The precautionary principle should be employed but option 3 does not go far enough. Hydraulic fracturing and UCG pose too great a threat to groundwater and are too carbon-intensive to be supported by the MWJP. Opposed to Unconventional gas extraction due to potential damage to properties, businesses and tourism.
2970 Frack Free York	2360	Q71		There should be a presumption against production of unconventional gas.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1784	Q71		<p>Proposed Policy: An applicant for planning permission for fracking or shale gas operations (including test drilling and extraction) must demonstrate by appropriate evidence and assessment that reasonable scientific doubt can be excluded as to adverse impacts of the proposed development alone or in combination with other developments: On the quality and quantity of water resources, including groundwater and water courses; On air quality (including through emissions of methane and sulphur); On seismic activity; On local communities; On greenhouse gas emission and climate change.</p> <p>Planning permission will not be granted unless: The Council is satisfied that all reasonable scientific doubt that there is any risk of adverse impacts has been eliminated; The proposal will not compromise the Council's duties in relation to climate change mitigation, and; The proposal is environmentally acceptable, or it can be made so by planning conditions or obligations.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2609 York Environment Forum	2207	Q71		<p>Yes- for the MWJP to make a bold statement opposing unconventional gas extraction. Hydraulic fracturing and Underground Coal Gasification pose too great a threat on environmental and health grounds and run contrary to existing strategies on climate change.</p> <p>Sites identified for unconventional gas extraction should be defined in three dimensions, expanding the site to include areas horizontally drilled underground. Therefore fracking sites which intrude on the Plan area from underground should therefore come under the remit of the plan.</p>
2951 ***Do Not Consult*** Consulted Under 2874***	0626	Q71		<p>CCs should be separated from fracking, CCS has potential environmental benefits whilst fracking has only negative effects. The mapping of boundaries should also be 3D, to include the area underneath sensitive areas as well as the surface.</p>
2797	0017	Q71		<p>Oppose all forms of hydraulic fracturing (fracking), or processes resembling fracking, concerning shale gas, coal bed methane or underground gasification, setting fire to coal seams to harvest gas. Concerned about impact it will have on air quality, drinking water, health climate change and the landscape.</p> <p>There should be a blanket ban on hydraulic fracturing and conventional gas development</p>
3004	2116	Q71		<p>Would like to see a precautionary principle which opposes 'unconventional' gas extraction throughout the plan area. If sites are identified for unconventional gas they should be defined in three dimensions taking into account horizontal drilling. They should also be subject to Environmental Impact Assessments.</p>
2992 Friends of the Earth	1631	Q71		<p>Oppose unconventional gas exploitation, in particular shale gas. The risk to water supplies- surface and aquifers- is too high and would be irreversible. The quantities of water required and the storage/disposal of contaminated water will prove unmanageable. Contaminants cannot be predicted but would include radio active particles. Farmland and amenity land would be despoiled. There would be traffic impacts. Methane would be released into the atmosphere, seismic effects cannot be predicted.</p> <p>An alternative would be to invest heavily in renewables (wave and tidal which are constant) and in energy storage.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
127 UK Coal Operations Ltd	1988	Q71		All the options take a precautionary position which could be viewed as negative. Government and business opinion is moving away from this approach and therefore the options presented appear unduly limited in exploiting unconventional gas.
2762 Third Energy Limited	1254	Q71		Suggest that a criteria-based policy is adopted which seeks to ensure that activities related to the exploration, appraisal and production of oil and gas and unconventional hydrocarbons take place in an environmentally acceptable manner. Therefore suggest following policy wording 'Planning permission will be granted for exploration, appraisal or production of oil and gas and unconventional hydrocarbons provided they do not result in any significant adverse impacts on local communities or the environment.'
1112 RSPB North	1728	Q71		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (National Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.
2997	1820	Q71		Until the effects of the process are more readily understood and evidenced I do not think CBM, UCG or shale gas exploration using fracking should go ahead. The precautionary approach should be followed as these processes have the potential to cause immense environmental damage to our water, land and air. Should opt for no fossil fuel except exploration but I understand that this is impossible due to the governments policies.
2874	0571	Q71		Separate Carbon Storage from this policy group as Carbon Capture and Storage (CCS) has potential environmental benefits whilst fracking has only negative effects. The boundaries of mineral resources should be mapped in 3D to include areas underneath the surface.
636 Huttons Ambo Parish Council	0591	Q72		Support Option 2 as will protect the environment and local amenity.

**Section:** 011: Coal

**Chapter:** 5

**Policy No:**

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3005	1874	5.152		The environmental impact of the options for disposal of colliery spoil should be taken into consideration. All alternatives must be thoroughly explored such as using it for secondary aggregate or filling quarry voids. A formal assessment should be undertaken by an independent body. The impact on the health, wellbeing and quality of life of residents should take precedence over economic situation at the colliery. Alternative tip sites must be thoroughly investigated and evidenced. Concerned that waste sites have been located close to residences. Public health departments should be involved and a Health Impact Assessment undertaken. Surveys should be undertaken in relation to water contamination if near large bodies of water.
2953	1962	5.152		Operators producing colliery spoil should be required to provide clear evidence of short, medium and long term disposal options using the 'Procedure Manual Evaluative Framework: Assessment of Alternative Colliery Soil Disposal Options'. This would demonstrate the economic and environmental effects of alternatives to enable judgements to be made. Colliery spoil operators should have targets set for using colliery spoil as secondary aggregate, this would move waste up the waste hierarchy. Concerned about the application for an extension at Womersley and the potential health implications. A Health Impact Assessment should be undertaken for all such tip sites along with a hydrogeological report if near water bodies. Encourage non road transport. A financial bond for restoration purposes should be considered where necessary.
2950 Blue Lagoon Diving & Leisure Ltd	0813	5.152		Operators producing colliery spoil should be required to provide clear evidence of short, medium and long term disposal options using the 'Procedural Manual Evaluative Framework: Assessment of Alternative Colliery Spoil Disposal Options. This would clearly demonstrate the economic and environmental effects of alternatives to enable judgements to be made. Coal operators should be encouraged to use colliery spoil as secondary aggregate, this would move waste up the waste hierarchy. There is an application being determined for an extension at Womersley Tip, this is the forth extension and is only short term. Strategic planning for short, medium and long term needs to be carried out. A health impact assessment and hydrological survey should be a minimum requirement at such tip sites. Non road transport should also be encouraged. The Joint Plan should include the need for a MPA to apply a financial bond for restoration purposes on such sites.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2956 ***Do Not Consult*** 2953***	1977	5.152		Operators producing colliery spoil should be required to provide clear evidence of short, medium and long term disposal options using the 'Procedure Manual Evaluative Framework: Assessment of Alternative Colliery Soil Disposal Options'. This would demonstrate the economic and environmental effects of alternatives to enable judgements to be made. Colliery spoil operators should have targets set for using colliery spoil as secondary aggregate, this would move waste up the waste hierarchy. Concerned about the application for an extension at Womersley and the potential health implications. A Health Impact Assessment should be undertaken for all such tip sites along with a hydrogeological report if near water bodies. Encourage non road transport. A financial bond for restoration purposes should be considered where necessary.
2954 ***Do Not Consult*** 2953***	1936	5.152		Operators producing colliery spoil should be required to provide clear evidence of short, medium and long term disposal options using the 'Procedure Manual Evaluative Framework: Assessment of Alternative Colliery Soil Disposal Options'. This would demonstrate the economic and environmental effects of alternatives to enable judgements to be made. Colliery spoil operators should have targets set for using colliery spoil as secondary aggregate, this would move waste up the waste hierarchy. Concerned about the application for an extension at Womersley and the potential health implications. A Health Impact Assessment should be undertaken for all such tip sites along with a hydrogeological report if near water bodies. Encourage non road transport. A financial bond for restoration purposes should be considered where necessary.
2955 ***Do Not Consult*** 2953***	1948	5.152		Operators producing colliery spoil should be required to provide clear evidence of short, medium and long term disposal options using the 'Procedure Manual Evaluative Framework: Assessment of Alternative Colliery Soil Disposal Options'. This would demonstrate the economic and environmental effects of alternatives to enable judgements to be made. Colliery spoil operators should have targets set for using colliery spoil as secondary aggregate, this would move waste up the waste hierarchy. Concerned about the application for an extension at Womersley and the potential health implications. A Health Impact Assessment should be undertaken for all such tip sites along with a hydrogeological report if near water bodies. Encourage non road transport. A financial bond for restoration purposes should be considered where necessary.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2955 ***Do Not Consult***Consulted Under 2953***	1949	5.153		UK Coal have stated that Gale Common ash disposal plant is not available for the disposal of colliery spoil, but it is referenced as an option in the Plan.
2954 ***Do Not Consult***Consulted Under 2953***	1937	5.153		UK Coal have stated that Gale Common ash disposal plant is not available for the disposal of colliery spoil, but it is referenced as an option in the Plan.
2956 ***Do Not Consult***Consulted Under 2953***	1978	5.153		UK Coal have stated that Gale Common ash disposal plant is not available for the disposal of colliery spoil, but it is referenced as an option in the Plan.
2953	1963	5.153		UK Coal have stated that Gale Common ash disposal plant is not available for the disposal of colliery spoil, but it is referenced as an option in the Plan.
2953	1964	5.154		Secondary aggregate from colliery spoil should be provided from source, not from existing tip sites.
2954 ***Do Not Consult***Consulted Under 2953***	1938	5.154		Secondary aggregate from colliery spoil should be provided from source, not from existing tip sites.
2955 ***Do Not Consult***Consulted Under 2953***	1950	5.154		Secondary aggregate from colliery spoil should be provided from source, not from existing tip sites.
2956 ***Do Not Consult***Consulted Under 2953***	1979	5.154		Secondary aggregate from colliery spoil should be provided from source, not from existing tip sites.
<b>Policy No:</b>		<b>id29</b>		
2197 CPRE (Harrogate)	1096	Q74		Preference for Option 1
2981	2289	Q74		The continued mining of coal is not supported. However, that is not an option therefore Option 2 is preferable.
2781 Cromwell Wood Estate Co Ltd	1672	Q74		Preference for Option 1
2841 Scarborough, Whitby and Ryedale Green Party	0215	Q74		Option 2. Should limit the extraction of fossil fuels.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3013	2022	Q74		Preference for Option 2.
1355	2180	Q74		Preference for Option 1
1111 The Coal Authority	0873	Q74		Encourage Option 1 to allow maximum flexibility as future of existing Colliery uncertain but reserves of coal will still exist.
2991 Envireau Water	1552	Q74		Preference for Option 1.
127 UK Coal Operations Ltd	1989	Q74		Option 1. The future of Kellingley Colliery is not secured but there should be support for the future mining to encourage investment in the Colliery and the coal reserves that could be exploited from the site.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1761	Q74		The managed closure of Kellingley Colliery should be reflected in the Plan, including minimising production during this period recognising the need to not burn fossil fuels.
112 Highways Agency	0431	Q74		No preference. Kellingley Colliery already has access to the rail network. Support use of the rail network for any expansion which happens at the colliery.
3001	1834	Q74		Neither option is acceptable. Coal is a dirty energy, adding to carbon emissions, The energy industry and the Government should be investing more in renewable energy such as hydro power, solar and wind.
3001	1835	Q75		The coal should be left in the ground until environmentally means of extraction are brought forward.
1541	2267	Q75		Burning coal, either deep coal or shallow coal, releases more CO2, adding to climate change. If the MWJP pursues coal mining it should also pursue carbon capture storage in the burning of coal.
74 Selby District Council	1323	Q75		Further information required. However, opposed to in-principle restrictions without technical or sustainability reasons. Any proposals should satisfy the MPA that mitigating the effects of subsidence and disposing of mineral waste are acceptable.
<b>Policy No: id30</b>				
112 Highways Agency	0432	Q76		No preference. The SA identifies that Option 2 is likely to include benefits of reducing transport distances which is generally supported.
119 Natural England	0919	Q76		Does not support either option 1 or 2. The environmental impacts of shallow coal extraction will depend on the location of any open cast allocations and the development management policies applied at the project stage.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2991 Envireau Water	1553	Q76		Preference for Option 2.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1762	Q76		Option 1. Support presumption against shallow coal, given its high carbon intensity, the urgent need to address climate change and the local environmental impacts of opencast shallow coal extraction. In addition do not support the extraction of coal to avoid sterilisation.
3013	2023	Q76		Preference for Option 1
2781 Cromwell Wood Estate Co Ltd	1673	Q76		Preference for Option 2
3001	1836	Q76		No further extraction of shallow coal due to high carbon emissions.
2841 Scarborough, Whitby and Ryedale Green Party	0216	Q76		Preference for Option 1
2981	2290	Q76		Preference for Option 1.
128 Yorkshire Wildlife Trust	0757	Q76		Doesn't support open cast extraction of shallow coal.
1111 The Coal Authority	0874	Q76		Support Option 2 as would allow opportunities for surface extraction to occur as both stand-alone proposals and as prior extraction schemes associated with sterilisation. The approach needs to remain flexible to take account of issues associated with the potential cessation of a sizeable proportion of the underground coal mining sector. Option 1 is too narrowly focused.
1541	2268	Q77		Burning coal, either deep coal or shallow coal, releases more CO2, adding to climate change. If the MWJP pursues coal mining it should also pursue carbon capture storage in the burning of coal.
<b>Policy No:</b>	<b>id31</b>			
3013	2024	Q78		Preference for Option 3.
2197 CPRE (Harrogate)	1098	Q78		Preference for Option 1
94 Craven District Council	2324	Q78		Prefer Option 3. This takes account of development pressures within urban areas.
2781 Cromwell Wood Estate Co Ltd	1674	Q78		Preference for Option 1



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2841 Scarborough, Whitby and Ryedale Green Party	0217	Q78		Preference for Option 3
1111 The Coal Authority	0875	Q78		<p>Option 3 would be fundamentally unsound and would not accord with the best practice advice set out in the 2011 BGS Guidance to Mineral Safeguarding. Neighbouring West and South Yorkshire have sought to not safeguard surface coal resources within urban areas. In all cases they have had to review and change their position in order to avoid being found unsound.</p> <p>The Coal Authority would seek the safeguarding of the whole surface coal resource across the Plan area which would be consistent with neighbouring plans and would meet requirements of the NPPF.</p> <p>Safeguarding in a two tier area will also require the designation of Mineral Consultation Areas.</p> <p>Support Option 2 but do not need a buffer around the resource.</p> <p>Would not object to Option 1.</p>
2753 Friends of the Earth - Yorkshire & Humber and the North East	1763	Q79		Advocate against the safeguarding of any coal resource, due to the extreme climate and local environmental impacts of coal extraction.
1112 RSPB North	1729	Q79		It would be sensible and pragmatic to extend the presumption against extraction in protected landscapes (national Parks and AONBs) to include international and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs, NNRs). This would reflect the high level of legal protection these sites have and would be consistent with the NPPF paras 14 and 119. In practice this would result in relatively little additional land being excluded, as the majority of these areas are within the National Park and AONBs.

**Policy No:** id32

2197 CPRE (Harrogate)	1099	Q81		Preference for Option 5
2753 Friends of the Earth - Yorkshire & Humber and the North East	1764	Q81		<p>Preference for Option 1.</p> <p>Do not safeguard deep coal.</p>
3001	1837	Q81		Preference for Option 1
2781 Cromwell Wood Estate Co Ltd	1675	Q81		Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
127 UK Coal Operations Ltd	1990	Q81		Support Option 5. Without a buffer zone coal would be sterilised by surface developments within the safeguarding boundary, therefore safeguarding would not have been effective. The 700m buffer is realistic and a good starting point, but technically it should be varied due to depths of minerals to be worked as subsidence zones project angular from the workings.
1111 The Coal Authority	0876	Q81		Support Options 4 and 5 Only safeguard the licenced areas of the deep coal resource.
1355	2181	Q81		Preference for Option 2
3013	2025	Q81		Preference for Option 3
286 Scarborough Borough Council	2395	Q81		Notes the approach recommended by the Coal Authority. The Coal Authority recommends that only areas licenced by the Coal Authority should be safeguarded.
2990	1924	Q82		In favour of safeguarding any minerals that are available and useful. However, comprehensive restoration must follow any extraction because the responsibility is on those who scar the landscape, even if for the common good, to restore it to what it was before work started. It is prudent to seek financial assurance by way of a sizeable bond, that in the event of a the developer becoming insolvent the land can be restored. Including a policy such as this would indicate that concerns are being taken seriously and allow Planning Committees to require such a commitment as a matter of course.
74 Selby District Council	1311	Q83		Supports a buffer in order to protect homes and places of work from impacts of quarries/mines. However, a need should be demonstrated within applications for a buffer.
<b>Policy No:</b>	<b>id33</b>			
968 Womersley Parish Council	0740			Continued tipping at Womersley tip would not comply with SA objectives 1,2,3,4,,5,8,9,11,13 and 15.
968 Womersley Parish Council	0736			Rather than incentivising the extraction of secondary aggregate from the existing site, systems should be put in place to use spoil as a secondary aggregate source, rather than re-working already tipped material.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
968 Womersley Parish Council	0734			<p>Operators producing colliery spoil should be required by the MPA to provide clear evidence of short, medium and long term disposal option using the 'Procedural Manual Evaluative Framework: Assessment of Alternative Colliery Spoil Disposal Options'. This would clearly demonstrate the economic and environmental effects of alternatives to enable considered judgement to be made. Operators producing colliery spoil should have a target set by the MPA incentivising them to use colliery spoil as a secondary aggregate, this should be a condition of granting PP.</p> <p>Repeated extensions in time and footprint, to existing sites, should not be allowed without the evidence base to demonstrate that all alternatives have been explored. A HIA should be a minimum requirement of all tips, full hydrology surveys undertaken and non road transport options should be a requirement of future considerations.</p> <p>Financial bonds should be sought to ensure restoration takes place.</p>
968 Womersley Parish Council	0735	5.153		The PC have been informed by UK Coal that Gale common ash disposal is not available for the disposal of Colliery spoil, therefore how can it be referenced as an option in the document.
2950 Blue Lagoon Diving & Leisure Ltd	0811	Q164		Option 2 - Environmental controls are currently inadequate. Businesses adjacent to the tip at Womersley affected by water run off from the colliery spoil.
2950 Blue Lagoon Diving & Leisure Ltd	0809	Q84		Option 1 - Insufficient protection if the water course is in place as per the problems experienced at the Blue Lagoon, adjacent to the tip in Womersley, where spoil run off has contaminated the water. The impact of the contamination has halted business because of poor documentation. Relevant agencies state there has been no breach in conditions so nothing to enforce. The documentation/permits are inadequate to protect the surrounding environment, business and homes.
2956 ***Do Not Consult***Consulted Under 2953***	1980	Q84		Option 1 is unacceptable to residents, it causes loss of amenity, has a standing objection from the County Landscape Architect, it has ecological impacts through the loss of a SINC, has highways issues, has health impacts through noise and dust and is in close proximity to residential properties as well as groundwater pollution issues.
2953	1965	Q84		Option 1 is unacceptable to residents, it causes loss of amenity, has a standing objection from the County Landscape Architect, it has ecological impacts through the loss of a SINC, has highways issues, has health impacts through noise and dust and is in close proximity to residential properties as well as groundwater pollution issues.
2197 CPRE (Harrogate)	1100	Q84		Preference for Option 1, maximise disposal capacity

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2781 Cromwell Wood Estate Co Ltd	1676	Q84		Preference for Option 1
968 Womersley Parish Council	0737	Q84		Option 1 is unacceptable, it causes loss of amenity, has objections for County Landscape architect, results in ecological impacts, highways issues, health impacts, ground water pollution and proximity to residential properties.
2955 ***Do Not Consult***Consulted Under 2953***	1951	Q84		Option 1 is unacceptable to residents, it causes loss of amenity, has a standing objection from the County Landscape Architect, it has ecological impacts through the loss of a SINC, has highways issues, has health impacts through noise and dust and is in close proximity to residential properties as well as groundwater pollution issues.
2954 ***Do Not Consult***Consulted Under 2953***	1940	Q84		Option 1 is unacceptable to residents, it causes loss of amenity, has a standing objection from the County Landscape Architect, it has ecological impacts through the loss of a SINC, has highways issues, has health impacts through noise and dust and is in close proximity to residential properties as well as groundwater pollution issues.
1111 The Coal Authority	0877	Q84		This is an operational matter for operator of the Colliery to comment upon, any approach must bear in mind the safety of spoil tips.
3013	2026	Q84		Preference for Option 1
3005	1877	Q84		Strongly object to Option 1 in id33 as this is unacceptable to the villages of Womersley and Cridling Stubbs, it causes risks to the health and wellbeing of residents and loss of amenity. The risks of creating a new tipping site are no greater than continuing with the existing site.
127 UK Coal Operations Ltd	1991	Q84		Option 1 as a minimum. Without support for continued spoil disposal the future of mining at Kellingley Colliery is in serious doubt. Even if the colliery moves forward in a managed closure plan, capacity for spoil disposal will be required, the alternative that the mine closes even earlier than planned. This issue is most important to the future of the colliery.
112 Highways Agency	0433	Q84		No preference. Option 1 seeks to utilise existing infrastructure at both Womersley and Gale Common, should disposal continue or expand at either site need to ensure there is no detrimental impact on the SRN. Option 2 seeks to find a new site, supports the inclusion in the option reference to transport.
3001	1838	Q84		Neither Option. We should not be reliant on coal for energy because of the environmental effects.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

497	Cridling Stubbs Parish Council	1357	Q85	Rather than incentivising the extraction of secondary aggregates from the existing sites (SA of id33), systems should be put in place to use spoil as a secondary aggregate from source, rather than extracting it once tipped and the area restored. Option 1 is unacceptable to the village of Womersley and Cridling Stubbs, it causes loss of amenity, landscape and ecological impacts, Highways issues, health impacts through noise and dust ground water pollution and proximity issues relating to residential properties.
74	Selby District Council	1324	Q85	Advocate reaching capacity at one site before new sites are developed and tightly controlling any restoration of sites. Consideration of restoration to alternative uses should be imposed at application stage.
112	Highways Agency	0835	Q85	Would support an option which disposes of colliery spoil in the most sustainably accessible location.
2990		1925	Q85	Option 1 is not acceptable and it must be of concern that UK Coal finds itself in financial difficulty. Whilst seeking to preserve the mineral supply it is time to consider other options, with questions to be answered if the Pit is to close within 18 months. There is now no need to consider expansion of the tipping operations at Womersley Tip, the voids at Darrington Quarry must be a viable option and is backfilling of mine workings a possibility?

**Section:                      012: Potash & Salt**

**Chapter:                      5**

**Policy No:**

2986		1804		The extraction and sustainability of the supply of potash is considered to be of national importance and therefore applications for this mineral should be weighted in their favour. To ensure that there is no interruption in the supply of a nationally important mineral it would be prudent to grant extraction to more than one supplier i.e. York Potash and Cleveland Potash.
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Respondent Number/Name

CommentNo Paragraph Sites

Comment

2865 Zurich Assurance Ltd

1588

The Potash resource is the most important within the UK, and the largest in the world. Polyhalite is a naturally balanced fertiliser applicable to wide range of crops, approved for organic farming. The proposed Sneaton Mine demonstrates that impact upon the landscape can be mitigated through detailed siting, design and landscaping. We note para 2.69 states the transport of minerals within the Plan area is predominantly by road, whereas the Sneaton Mine proposes a viable and practical alternative, a tunnel to transport excavated material. This would suggest that the York Potash proposal is highly unlikely to have a significant permanent effect.

2865 Zurich Assurance Ltd

1589

Important to emphasise the long term social and economic benefits that can arise from minerals extraction. The potential investment in new facilities for the York Potash proposal should be welcomed in an area that has suffered serious economic decline. Support objectives that establish links between mineral working and local communities, an example of such is the York Potash Foundation, which will fund the general well being of local people etc. The disturbance to the environment and landscape will be outweighed by the economic and social benefits.

252 York Potash

1042

5.158

The rationale for not allocating land for potash extraction is primarily given as the lack of specific level of potash reserves to be maintained in numerical terms. This approach avoids the NPPF's requirement to ensure that there is an adequate and steady supply. It also takes no account of the benefits that would be delivered from mining the mineral.

As identified potash and salt are located underground in close proximity. The Winter Resilience Review (DfT Oct 201) states on of the reasons for the inadequacy of the supply chain for salt is 'highly constrained production' and concludes that 'imports of about 0.9 mt pa at some point is inevitable'. Imports are not a sustainable source of supply and the NPPF seeks to source minerals indigenously to expect one supplier to generate this production would mean forgoing the same tonnage of potash that would be saleable at a higher price- or expecting the nation to pay potash prices for salt. A new indigenous source should, therefore be identified.

The MWJP should recognise the following points:

- the NYMNPAs has previously accepted that a sufficiently strong case can be made to authorise development of a potash mine in the park by granting permission for the retention and extension of Boulby.
- NPPF has attached great weigh to the economic benefits of mineral extraction and the MWJP should retain and reinforce the policy support for potash as contained in Core Policy E of the NYMNPAs Core Strategy and Development Policies.
- there is clear economic benefit to the local and national economy of opening up a second source of potash and would strengthen links between the SEP.
- York potash has identified a resource that is both present and workable.
- the York potash proposals have been developed to include a sustainable transport system and modern extraction methods, meaning the site would be less environmentally harmful than the existing Boulby mine.
- there would be benefits to plan in providing a second source of halite.

252 York Potash

1043

5.159-5.

On reading the Regulation 18 Summary of responses (August 2013) it is unclear how these conclusions are the only ones that are derived from the representations.

**Policy No:**

id34

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
286 Scarborough Borough Council	2396			The issue of a potential new potash mine is likely to be determined outside the framework of the Minerals and Waste Joint Plan, and in due course the Plan may need to reflect on the strategic situation if and when a decision on the new mine is made. The planning application process will provide the opportunity for the Borough Council to consider all relevant issues and make representations. The Major Development Test is the correct framework for assessing proposals of such a nature in National Parks once all the details and facts are available, so it is not necessary to take a stance regarding the options raised in the current consultation.
2921 The Strickland Estate	1396			The NPPF acknowledges that potash is 'a nationally important mineral' and so necessary to meet society's needs. It is already acknowledged within the National Park Core Strategy and Development Policy Document and this approach should be reiterated in the MWJP. Minerals extraction is defined as a temporary development in planning terms. MWJP plan goes to 2030 and the current planning permission at Boulby only extends to 2023, although they intend to extend this. The MWJP should ensure that there is a steady and adequate supply of potash, to ensure this an alternative supply of potash should be identified in the MWJP.
3013	2027	Q86		Preference for Option 3
2781 Cromwell Wood Estate Co Ltd	1677	Q86		Preference for Option 2



Respondent Number/Name

CommentNo Paragraph Sites

Comment

252 York Potash

1044

Q86

Supports option 2 on the basis that this represents a rational approach to the provision of an adequate and steady supply. This is the only approach consistent with national policy.

The relatively confined area of incidence of the deposit means that the most appropriate location due to mining constraints, economics and transport mechanisms can be demonstrated as being within the boundary of the National Park.

Options 1,3and 4 would not be consistent with NPPF.

Option 1- the NPPF states that one of the roles of the planning system is to contribute "to building a strong, competitive economy" this option would create a monopoly situation.

Option 3- denies the possibility that such development within the NP could demonstrate exceptional circumstances. This option represents a constraint on the basis of an administrative boundary.

Option 4- it would be wrong to rule out the whole of the NP from any impact at all when the NPPF recognises that major development can occur in these locations in exceptional circumstances. The justification assumes that all potential impacts are detrimental whilst some impacts may be positive.

2864 Coke Turner & Co Limited

0414

Q86

Preference for Option 2.

it is important to maintain as many sources as possible to ensure healthy competition. Mining operations are inherently risky and therefore several sources of supply should mitigate risk to supply. The current permission at Boulby is due to expire 2023 and there is no guarantee it will be extended, therefore the policies in the MWJP should encourage alternative sources of supply.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2865 Zurich Assurance Ltd	1585	Q86		Option 2.  Strikes the best balance between making use of Potash reserves, the long term objectives of NYMNP and the well being of local communities. NPPF para 142 and 144 say 'minerals are essential' and 'LPAs should give great weight to the benefits of mineral extraction'. The NPPF also states 'landbanks for non-energy minerals should be maintained, as far a practical, from outside National Parks'. Polyhalites are scarce and the reserves in the NYM constitutes the most significant deposit in the UK, indeed it is the largest proven high quality reserve in the world. The Boulby Potash Mine is currently the UKs only potash mine and it makes sense to establish alternative sources to ensure continuity of supply.
2993 Dawnay Estates	1593	Q86		Favour Option 2. There is a need to maintain multiple sources of supply in order to maintain a continuous supply throughout the plan period along with healthy competition.
119 Natural England	0920	Q86		Supports Option 4.
2250 York, North Yorkshire and East Riding Local Enterprise Partnership (YNYER LEP)	0900	Q86		Preference for Option 2.  Allows for further sites of Potash extraction creating direct jobs and through local supply chain opportunities. The LEP Economic Plan highlights the importance of a Potash Mine on the local economy. LEP priority to develop successful and distinctive places and ensure a strong and growing coastal economy through investment.
2197 CPRE (Harrogate)	1101	Q86		Preference for Option 3
3021	1968	Q86		I agree

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2849	0254	Q86		<p>Option 2 is supported.</p> <p>The Plan should seek to ensure a steady and more than adequate supply is not interrupted. The existing potash mine runs out of planning permission in 2023. Even if it is extended, competition would be enhanced by another having consent. The Planning Acts should not act as a constraint on supply. It is not prudent to rely on the existing single supplier. York potash have confirmed another workable reserve and this should be facilitated and allocated in the Plan.</p> <p>Option 4 is unworkable and the Plan must recognise that additional surface infrastructure is needed to exploit the nationally (and internationally) important potash reserves.</p>
292	The Crown Estate	1218	Q86	<p>It is critically important to enable the adequate supply of potash and salt resources given their local and national importance in the NPPF. This Plan area is rich in resources and critical to the supply of this mineral to the UK. As planning permission at Boulby Potash mine expires in 2023 the Plan needs to consider how this resource will be met until 2030.</p>
801	Pickering Town Council	0477	Q86	<p>Supports Option 4.</p> <p>Underground working would not be likely to have an effect on the special qualities of the National Park but surface infrastructure would. This option would protect environmental and recreational assets but provide benefits of mineral supply and economic gain.</p>
128	Yorkshire Wildlife Trust	0758	Q86	<p>Preference for Option 3. Development of a potash mine in the NYMNPA would be inappropriate development.</p>
2872		0482	Q86	<p>Preference for Option 2.</p> <p>Current proposals for potash extraction are a sympathetic approach to minimising effects upon the environment whilst providing local and national economic benefits.</p>

2867		1878	Q86	<p>Option 1 - This misunderstands how the life of the mines develop over time, they become 'exhausted', it becomes more and more difficult for a mine to remain economically viable when it has a single mine head access point and extractable ore has to be won from greater and greater distances from the mine shaft bottom. There is proposed investment at Boulby which may extend the life of the mine for 1 or 2 decades. With this Option there is a risk of a situation arising where there is no extraction of potash.</p> <p>Option 2 - Would provide the possibility of 'economic benefits' and social and environmental benefits as well. Would allow a much higher degree of certainty of continuity of supply of potash.</p> <p>Option 3 - is a sensible approach to protect the Park from any development. However the geology of resources does not support the economic mining of potash from other location other than Boulby and within the vicinity of York..</p> <p>Option 4 - Though it would be technically feasible to place a mine head at a considerable distance from where the extractable ore is winnable, York Potash would never proceed with such a scheme because</p> <ul style="list-style-type: none"> <li>- such a mine would have the same issues that 'exhausted' mines do with long distances to workings, drastically impairing the economics of such a proposal.</li> <li>- There would be large and unacceptable amounts of spoil created in cutting the long drifts/tunnels needed to reach the ore from the mine head.</li> <li>- There would be long journey times fro staff from face to surface would add significant risk to the wellbeing of operative in an emergency situation.</li> </ul>
2779	Pickering Civic Society	0044	Q86	Preference for Option 2
2998		1817	Q86	<p>Preference for Option 2.</p> <p>It is important to maintain as many sources as possible in order to ensure healthy competition. Planning permission expires at Boulby Potash Mine in 2023 and the Plan requires an adequate supply until 2030. The MWJP should encourage an alternative source of supply.</p>
2921	The Strickland Estate	1397	Q86	<p>Prefer Option 2, which supports the principle of multiple sources of potash supply. The existing Boulby potash mine cannot work the whole area without further surface infrastructure being developed within the National Park, therefore Options 3 and 4 are not viable and additional surface development within the National Park is inevitable if extraction is to continue.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2943 Yorkshire Coast Minerals Association	0594	Q86		Agree with Option 2. Mining ventures involve an element of risk and the existing single supplier may experience unanticipated difficulties. Reliance on a single supplier is not a sound basis on which to allow the nation's indigenous supply to be extracted. Option 2 allows for the principle of multiple sources of potash. If these are concurrent then an element of competition will be introduced which will be healthy for the economy and the customer. The existing potash supplier cannot work the whole of the potash deposit without additional surface infrastructure for ventilation within the National Park.
1112 RSPB North	1737	Q86		The potash resource lies partially within (and the proposed Polyhalite mine lies adjacent to) the North York Moors SPA and SAC. The existing potash mine is within 3.5km of these designations. None of the Options or supporting text refer to the potential impacts of minerals development on these designations. As with silica sand minerals development 'should be subject to a satisfactory outcome of an Appropriate Assessment under the Habitat Regulations'. The Plan policy should clearly reflect this. If an allocation for potash comes forward a full Appropriate Assessment is likely to be required in fulfil the requirements of the habitats regulations.
116 Ryedale District Council	1178	Q86		In view of the economic benefits, the principle of further extraction from a further mine should be supported, provided environmental effects can be satisfactorily addressed. Providing it is reasonable and viable, it is considered that surface infrastructure should be located outside the National Park. the Major development test would be the appropriate way in which to establish the need for surface development to be located within the National Park.
3003	2125	Q86		Support Option 2  Economic benefit to the residents of the National Park.
2841 Scarborough, Whitby and Ryedale Green Party	0218	Q86		Option 4. No strong opinion. Eventually agriculture will have to be conducted without extra potash when supplies run out.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1765	Q86		Preference for Option 1.
2942	0600	Q86		Agree with Option 2. Should not rely on a single supplier of a specific mineral. Concurrent multiple sources of potash will introduce an element of competition which will be healthy for the economy and consumers.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3001	1839	Q86		Preference for Option 3.  It is regrettable that we have a Potash mine in the National park.
1112 RSPB North	1738	Q87		An additional option would be an amended version of Option 4, which only supports the siting of surface infrastructure outside of European protected sites 'subject to a satisfactory outcome of an Appropriate Assessment under the Habitat Regulations' (potential impacts on the protected sites from nearby infrastructure and underground working, e.g. disturbance, groundwater and hydrology impacts, risk of subsidence etc. would still need to be assessed for a proposal of this nature and scale).
3001	1840	Q87		Potash is of national importance and there should be a limit on how much of the mines production is exported. Supplies should be preserved and not exported, which would increase carbon emissions.
2942	0601	Q87		No
2943 Yorkshire Coast Minerals Association	0595	Q87		No
2864 Coke Turner & Co Limited	0415	Q87		No.
<b>Policy No:</b>		<b>id35</b>		
3021	1969	Q86		No
2197 CPRE (Harrogate)	1102	Q88		Preference for Option 2
2781 Cromwell Wood Estate Co Ltd	1678	Q88		Preference for Option 2
252 York Potash	1045	Q88		Neither option is entirely satisfactory as they are both predicated on subsidence occurring at the surface to a degree which would harm development. There does not appear to be any damaging subsidence resulting from extraction for the Cleveland Potash as subsidence occurs over wide areas.
3021	1970	Q88		I agree
128 Yorkshire Wildlife Trust	0759	Q88		Preference for Option 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2993 Dawnay Estates	1594	Q88		Favour Option 2. There is a need to safeguard against sterilisation of Nationally Important minerals by surface development. Exploitation of nationally important minerals requires additional surface infrastructure which should be supported in the NYMNP provided the design meets acceptable and high standards and there is no other locations outside the NYMNP which would be more suitable and viable.
2864 Coke Turner & Co Limited	0416	Q88		Agrees with Option 2.  Option 2 conforms to the requirements of NPPF. In order to achieve a robust economy there should be a consistent and adequate supply of potash, consequently the known resources should be safeguarded.
3013	2028	Q88		Preference for Option 2
2921 The Strickland Estate	1398	Q88		Option 1 does not comply with paragraph 143 of the NPPF which relates to safeguarding. The whole of the identified resources area should be allocated as a Mineral Safeguarding Area and Mineral Consultation Area. Support Option 2 which accepts that the known resource area should be safeguarded in line with the requirements of the NPPF.
1033 CTC North Yorkshire	2254	Q88		Preference for Option 1
2849	0255	Q88		Supports Option 2. The newly identified potash reserve must be safeguarded.
116 Ryedale District Council	1238	Q88		Preference for Option 2.
2943 Yorkshire Coast Minerals Association	0596	Q88		Agree with option 2. By safeguarding land above all of the potash resource, the MWJP will ensure that potash, a nationally important mineral, will not be sterilised by surface development. Option 2 meets the requirements of the NPPF.
2942	0602	Q88		Agree with Option 2. By safeguarding land above all of the potash resource the Plan is ensuring that potash is not sterilised by development.
2998	1818	Q88		Preference for Option 2.  Conforms to the requirement of the NPPF. In order to achieve a robust economy there should be a consistent and adequate supply of potash.
2779 Pickering Civic Society	0045	Q88		Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
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2865 Zurich Assurance Ltd	1586	Q88		Option 2.
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It is critically important that none of this resource is sterilised by surface development. Option 2 is in accord with the recommendations of the BGS Report OR/11/046 'Minerals safeguarding in England: good practice guide'

**Section: 013: Gypsum**

**Chapter: 5**

**Policy No: id36**

2781 Cromwell Wood Estate Co Ltd	1680	Q90		Preference for Option 1
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3013	2029	Q90		Preference for Option 3
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74 Selby District Council	1325	Q91		Support employment opportunities at power stations, sustainable growth and the use of by-products.
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**Policy No: id37**

2197 CPRE (Harrogate)	1104	Q92		Preference for Option 1
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3013	2030	Q92		Preference for Option 1
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2197 CPRE (Harrogate)	1103	Q92		Preference for Option 1
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2781 Cromwell Wood Estate Co Ltd	1681	Q92		Preference for Option 2
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**Section: 014: Vein Minerals**

**Chapter: 5**

**Policy No: id39**



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1739	Q97		The supporting text specifically states that vein minerals are often found in areas of significant ecological interest such as the North Pennine SPA and SAC. Given the potential impact on these international nature conservation designations any vein mineral proposals should be subject to a satisfactory outcome of an Appropriate Assessment under the Habitat Regulations'
2197 CPRE (Harrogate)	1106	Q97		Preference for Option 1
134 Nidderdale AONB	1007	Q97		Preference for Option 2
2781 Cromwell Wood Estate Co Ltd	1683	Q97		Preference for Option 1
2841 Scarborough, Whitby and Ryedale Green Party	0219	Q97		Preference for Option 2
119 Natural England	0921	Q97		Supports Option 2. Given the lack of commercial interest and the environmentally sensitive locations of these minerals, the plan should not support this principle of vein minerals.
3013	2032	Q97		Preference for Option 2
1112 RSPB North	1740	Q98		Due to the potential impact on international nature conservation designations any vein mineral proposals should be subject to a satisfactory outcome of an Appropriate Assessment under the Habitat Regulations'
<b>Policy No:</b>	<b>id40</b>			
2197 CPRE (Harrogate)	1107	Q99		Preference for Option 1
3013	2033	Q99		Preference for Option 1
2781 Cromwell Wood Estate Co Ltd	1684	Q99		Preference for Option 2
92 Durham County Council	1796	Q99		County Durham is to Safeguard all known fluorspar vein. It is the Councils intention to undertake further work on vein minerals and prepare a development management Policy on vein minerals within the forthcoming Minerals and Waste Policies and Allocations Document. Therefore Option 1 would be supported.

**Section: 015: Other Minerals**

**Chapter:**                      **5**

**Policy No:**                      **id38**

252 York Potash

1046

Option 1 is preferable of the two, but should be revised on the basis of giving great weight to the mineral reserve which is scarcest and most economically significant. This approach would be consistent with national policy.

Shaft sinking in the vicinity of gas reserves is not possible as it compromises safety and the gas is often associated with faults which could cause instability in the shafts. Where one type of operation affects another there may be opportunities to phase extraction or, if the affected mineral is nationally important and could be worked in an appropriate timeframe, allow that mineral to be extracted first. In the conflict between gas and potash the potash would have to be removed first as the gas extraction processes sterilise unacceptable areas of mineral and/or could cause instability/fracturing in the potash. Potash is also scarcer and cannot be worked from other locations.

The purpose and effect of the 'exclusion zone' is unclear. The 5km and 10km figures are arbitrary and could result in unnecessary sterilisation of mineral resources.

2779 Pickering Civic Society

0046

Q94

Preference for Option 2

2781 Cromwell Wood Estate Co Ltd

1682

Q94

Preference for Option 2

2197 CPRE (Harrogate)

1105

Q94

Preference for Option 1. The need for gypsum may become greater if power stations close.

116 Ryedale District Council

1179

Q94

Preference for Option 1.

250 Dart Energy (Europe) Ltd

0846

Q94

The Key issue for safeguarding of deep mineral resources relates to the potential conflicts between extraction of different mineral resources.

Option 1 is preferred as different resources may lie in different rock beds. The onus should be on the developer to demonstrate this rather than a fairly arbitrary exclusion zone.

1111 The Coal Authority

0878

Q94

Option 1 most appropriate

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3013	2031	Q94		Preference for Option 1
2779 Pickering Civic Society	0047	Q96		Potash and Polyhalite
2145 Petroleum Safety Services Ltd	0793	Q96		Implementing exclusion zones would imply a presumption in favour of potash extraction over oil and gas. Whilst not against fracking exclusion zones from existing development such as mines the distance imposed must be based on science and not an arbitrary figure.
<b>Policy No:</b>	<b>id41</b>			
112 Highways Agency	0434	Q101		Supports both options as both seek to transport minerals without using the road network. Prefer Option 1 SA identifies this option as having greater positive effect in terms of reducing transportation.
1033 CTC North Yorkshire	2255	Q101		Preference for Option 1
128 Yorkshire Wildlife Trust	0760	Q101		Supports option 2. Borrow pits can be valuable for biodiversity particularly where ponds are produced as a result of extraction. Would support the borrow pits being allowed to regenerate naturally where good quality ponds will be created.
3013	2034	Q101		Preference for Option 2
2197 CPRE (Harrogate)	1108	Q101		Preference for Option 1, agree with principles listed
1577 Lafarge Tarmac	0975	Q101		Preference for Option 1.  Taking material from existing permitted quarries can distort the local market and lead to conflict with local communities over traffic routing to construction sites.
2841 Scarborough, Whitby and Ryedale Green Party	0220	Q101		Preference for Option1
2779 Pickering Civic Society	0048	Q101		Preference for Option 1
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0161	Q101		Option 1 represents the most sustainable option by (normally) minimising haulage distances and ensuring the use of the most suitable mineral for the proposed development. This helps to conserve high quality resources for the most appropriate end uses whilst relieving pressure on landbanks.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1492	Q101		Option 1 seems appropriate. Having a borrow pit close to a construction scheme is acceptable. Taking the extra material from existing permitted quarries can distort the local market and lead to conflict with local communities regarding traffic routing to construction sites.
115 Minerals Products Association	1493	Q102		The Joint Plan has not considered the proposed construction of agricultural lagoons. In some areas a number of sequential schemes have arisen that amount to a 'migrating quarry' which industry believes tries to circumvent landbank restrictions without controls usually found in mineral consents. If this has not yet arisen as an issue then some text in the Plan that discourages migrating quarries should be considered, more details available on request.
<b>Section:</b>	<b>016: Moving Waste up the hierarchy</b>			
<b>Chapter:</b>	<b>6</b>			
<b>Policy No:</b>	<b>id42</b>			
1665	0010			Supports the incineration of waste as a means of reducing waste being deposited at landfill. Understands that the locations of incinerators is difficult to determine but suggests each town/city should have one. Supports the restoration of landfills to appropriate uses.
121 Environment Agency	1284			A crucial issue in ensuring that waste is dealt with in accordance with the principles of the waste hierarchy is ensuring that there is a network of facilities which offer high quality sorting and segregation of waste to ensure that only residual waste is passed to management options further down the hierarchy such as landfill and energy from waste. Without the network it is very hard to ensure that the hierarchy can be applied in priority order.
1167 Hambleton Sustainable Development and Planning Policy	1222			Adapt the waste hierarchy to take account of the fact that landfilling dried, inert waste is less environmentally damaging and more sustainable than incineration of carbon-heavy waste, with or without energy recovery.
1665	0009			Supports the recycling of household waste
204	0022			The incinerator scheme is a must and it is for the Council to decide where it is to be located.

2180 Peel Environmental Limited

0257

Agree the Plan should take account of the waste hierarchy. However it is considered that this approach has been misinterpreted throughout the Issues and Options Consultation Document. The onus in all three options is placed on the developer to demonstrate that it is 'not practical to manage waste further up the hierarchy', 'that the waste is to be managed at the facility would be managed at the highest practical level of the hierarchy...' and ' the facility would help reduce reliance upon landfill...'

Similar statements are presented in other option boxes (id44 and id45).

It is considered that this approach is not appropriate, or that it has either legislative or policy support.

The revised Waste Framework Directive (rWDF) (2008) seeks to apply a priority order for waste prevention and management (the waste hierarchy). The rWDF has been transposed into UK legislation through the Waste (England and Wales) Regulations, April 2011. In this instance there are two relevant Regulations: Regulation 8- adoption of the waste hierarchy as a priority order, together with encouraging options that deliver the best overall environmental outcome. However it is expressly stipulated in Regulation that this applies to the plan-making process and not in the exercise of development control. Regulation 12 requires that on transfer of waste, all such measures as are reasonable in the circumstances should be taken to apply the waste hierarchy as a priority order.

In light of the foregoing, it is considered that it is clear in legislation that the duty to adopt the waste hierarchy as a priority order and to deliver the best overall environmental outcome, is not incumbent upon the applicant. This view is supported by the SoS in his consideration of the Middlewich EfW decision 1 Para 24.

The options and any subsequent development Plan policy options should not seek to place the burden of the waste hierarchy upon the applicant. Therefore no presented options are supported.

2968 York Green Party

2298

Adopt a long-term strategy which works towards a zero waste economy. Support for waste processing infrastructure should be conditional on its ability to help deliver this. The policy should contain an evidenced strategy to account for non-delivery of AWRP.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1167 Hambleton Sustainable Development and Planning Policy	1226			Recognise that by removal of all toxic, recyclable and biodegradable material from waste leaves an inert material that does not cause climate change or pollution which is more sustainable than incinerating low-carbon value waste. This should be taken into account when defining sustainable options of waste management.
119 Natural England	0925	Q103		Preference for Option 2.
1577 Lafarge Tarmac	0976	Q103		Supports the reference to the use of inert waste as land restoration/recovery in Options 1 and 2.
3013	2035	Q103		Preference for Option 2.
135 FCC Environment	0685	Q103		Preference for Option 1
171 North Yorkshire Waste Action Group (NYWAG)	1020	Q103		Option 3 gives greatest degree of flexibility. Overall approach to the waste hierarchy to be the main driver of technology choice, this would discount incineration. Should not totally dismiss landfill.
128 Yorkshire Wildlife Trust	0761	Q103		Supports Option 2.
231	2147	Q103		There is little difference between Options 1 and 2, should 'the principle of recovery of waste' read 'the principle of recovery of energy from waste'? Support Option 2, energy recovery should not be given a greater priority than resource conservation. Suggest that the destructive recovery of energy from mixed waste should only be supported where it can be demonstrated that no further movement up the waste hierarchy can be achieved.
94 Craven District Council	2325	Q103		Option 2 is considered to be appropriate taking account of practicability.
585 Green Hammerton Parish Council	0512	Q103		Option 3 gives greater flexibility. Modern processes and landfill of inert residual waste may be a realistic response rather than no landfill at any cost
911 Tockwith & Wilstrop Parish Council	0079	Q103		Preference for Option 2. Preference is based on the understanding that waste is managed at the 3 highest stages of the waste hierarchy (prevention, preparation for re-use and recycling). Other recovery (including incineration and energy recovery), and disposal should be discouraged.
2841 Scarborough, Whitby and Ryedale Green Party	0221	Q103		Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2197 CPRE (Harrogate)	1111	Q103		Preference for Option 3 This option will eliminate incineration and allow reclamation and reuse of land. This option will maximise the benefits of all aspects of waste management.
1355	2182	Q103		Preference for Option 3
2609 York Environment Forum	2208	Q103		Of the options presented, option 2 is preferable. See comment 2209 Q104 and 2210.
213	1900	Q103		Prefers Option 2 with emphasis on schemes which provide the maximum of recycling and recovery, treatment close to source of arisings and developing RDF. Emphasis on multiple sites to reduce transport and congestion. EFW should only be permitted where there are proven plans to use the heat generated.
116 Ryedale District Council	1180	Q103		All options would be appropriate but it is considered that Option 2, in line with the Government's Zero waste policy would be the most appropriate option.
157	0133	Q103		Of the limited options presented Option 3 appears to give the greatest flexibility. Some modification is necessary, for example, some modern processes and landfill of inert residue may be realistic, and indeed some landfill may be necessary for restoration following mineral extraction.  Any option should facilitate the implementation of waste prevention, waste minimisation, reuse and recovery, including separation, recycling, distribute treatment facilities near major waste producing areas and the importance of RDF.  Moving waste up the waste hierarchy should be a major driver in technology choice.
2981	2291	Q103		Support moving waste up the hierarchy but would take it further to a 'zero waste economy' or 'close loop'. Prefer Option 2.
766 Marton-cum-Grafton Parish Council	0547	Q103		Preference for Option 2.
422 Bilton-in-Ainsty with Bickerton Parish Council	0714	Q103		Landfill cannot be totally eliminated and should be assumed in all calculations.
3001	1841	Q103		Preference for Option 2.  Least worst option

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1494	Q103		Only commenting on inert waste which is used as land restoration/recovery. Construction and demolition waste which has been processed to remove the recyclable components and is largely composed of residual sub soils and clay should be considered favourably for quarry restoration/land recovery. Options 1 and 2 have an allowance for waste used for quarry restoration and land recovery.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1766	Q103		Preference for Option 2.  Support moving waste as far as possible up the waste hierarchy.
2988	0863	Q103		Preference for Option 2.  Strongest possible support for moving up the waste hierarchy.
121 Environment Agency	1285	Q103		Support Option 2. Offers the best chance of the waste hierarchy being applied in priority order. Strongly recommend option 2 includes the following wording. 'All energy from waste facilities must provide evidence which clearly demonstrates that either; on site sorting facilities will be provided to ensure that only residual waste will be incinerated; or waste has been segregated at source so as to render it residual; or the proposed facility will form part of a network of facilities which together allow the management of waste in accordance with the waste hierarchy. Where this cannot be demonstrated proposals shall be rejected on this basis.'
969 Wykeham Parish Council	1403	Q104		Support re-use, recycling and composting of as much waste as practicable and minimise landfill. Supports the principle of developing a AWRP type facility, particularly if energy can be generated as a by-product.
3009	2132	Q104		Take account of the EU 'Resource Efficient Europe' resolution, which starts the legislative process of rendering illegal the incineration of any recyclable or compostable materials by 2020.  The conventional waste hierarchy should be adapted to take account of the fact that disposal by landfill of dried, inert materials is less environmentally damaging (and more sustainable as a transitional measure toward a zero waste economy) than the incineration of carbon-heavy waste, with or without energy recovery.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
157	0134	Q104		<p>The plan needs to:  look harder at local processing of waste.  Evaluate the option of exporting waste as a long-term solution for example, waste in the north of the county transported to Teesside and waste in the south transported to Leeds or South Yorkshire markets, transported directly overseas and exporting residual waste as RDF.  Consider a modular approach that grants greater flexibility such as MBT or MBT/AD.  Consider the amount of residual waste needed for landfilling of former minerals sites.</p>
766	Marton-cum-Grafton Parish Council	0548	Q104	<p>The Council should consider requiring that no energy recovery is permitted without appropriate heat recovery.</p>
422	Bilton-in-Ainsty with Bickerton Parish Council	0715	Q104	<p>Meaningful analysis of all alternatives with full costing is essential</p>
911	Tockwith & Wilstrop Parish Council	0080	Q104	<p>A strategy should be developed that seeks to use the 3 highest stages of the waste hierarchy (prevention, preparation for re-use and recycling) should be developed, and consider the following criteria:  -Proximity of waste to where it is processed.  -no importation of waste into the Plan area.  -the service should provide value for money.  - the plan should consider how the Joint Plan authorities collaborate with other authorities on waste matters.  -need to consider using facilities outside the Plan area.  The Plan should be flexible to cater for changes in the future.</p>
3001		1842	Q104	<p>More joined up thinking between NYCC and the LPAs. Confusion over what items can be recycled. There needs to be improved provision for recycling, with clearer information for all users of the recycling services offered. Biodegradable waste should be dealt with by AD, capacity needs to be increased. Heat from incinerated waste must always be useable, through District heating systems. Incineration should only be used as a last resort.</p> <p>Encourage reduction in consumption of consumer goods, the disposal of edible food and recycle as much as possible. Set up shops next to HWRCs which sell disposed items in a good condition.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2988	0864	Q104		Supports increased use of anaerobic digestion. No biodegradable waste to landfill. Prevent methane emissions to meet climate change objectives. Development of renewable sources of gas. Increase waste suitable for composting.
2966 Green Party	1558	Q104		Adopt a long-term approach towards a zero-waste economy. Include a Plan B to take account for potential non-delivery of AWRP.
231	2148	Q104		Would support a plan based on bringing about a zero waste economy, support for waste processing developments should be based on their ability to deliver this.
2609 York Environment Forum	2209	Q104		All the options are vague on specifics. A great deal more exploration of alternative options based on successful schemes employed elsewhere needs to be presented and consulted on, framed within a zero-waste approach and in the context of a circular economy approach.
1167 Hambleton Sustainable Development and Planning Policy	1225	Q104		Adopt a long-term approach working towards a zero-waste economy, only supporting proposals which work towards this. Prioritise elimination, minimisation, repair and re-use, with recycling lower down the priority scale and energy recovery and landfill as last resorts.
2968 York Green Party	2297	Q104		<p>The waste hierarchy should be adapted to take account of the fact that disposal by landfill of dried, inert materials is less environmentally damaging and more sustainable than the incineration of carbon-heavy arisings, with or without, energy recovery.</p> <p>The MWJP should take account of the EU 'Resource Efficient Europe' resolution which starts the legislative process of rendering illegal the incineration of any recyclable or compostable materials within the EU by 2020.</p>
171 North Yorkshire Waste Action Group (NYWAG)	1021	Q104		<p>Alternative options should be considered.</p> <p>Consider local processing of waste or exportation as a long term solution.</p> <p>Consider a modular approach for greater flexibility such as MBT</p>
2965	0636	Q104		<p>The policy should firmly adopt a long-term approach that works towards a zero-waste economy. Support for waste facilities should be conditional on its ability to play a part in delivering this.</p> <p>The Plan should contain a more fully formed plan B to take account of the non-delivery of AWRP.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1541	2269	Q104		Adopt a long-term strategy which works towards a zero waste economy. Support for waste processing infrastructure should be conditional on its ability to help deliver this. The policy requires a costed Plan B, based on zero waste, to replace AWRP which is neither financially viable nor environmentally sustainable.
585 Green Hammerton Parish Council	0513	Q104		Look harder at local processing of waste and/or evaluation of exporting waste as a long term solution.

**Section: 017: Strategic Role of the Plan area**

**Chapter: 6**

**Policy No:**

2766 Derbyshire County Council	0950	6.31	Support this para and 6.32 which recognise that whilst communities should be encouraged to be self-sufficient in terms of waste management, in some cases it may not be practicable, particularly for specialist waste streams, i.e. Hazardous and LLR Waste.
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2766 Derbyshire County Council	0951	6.33	Under Duty-to-Cooperate, discussions between DCC and the Yorkshire Authorities to identify significant imports/exports and all authorities will continue to monitor and liaise in these matters. The plan recognises the need to plan flexibly for the small scale movements that have identified.
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**Policy No: id43**

2333 Dringhouses and Woodthorpe Planning Panel	2296		<p>The rejection of plans for a large, noisy and traffic ridden central disposal site at Allerton recently was good news.</p> <p>Large cities and towns in the Plan area and their associated smaller towns, villages and settlements should each have their own disposal sites thus reducing road traffic on trunk routes in the area. Urgent consideration should be given to back landfill waste being compressed and moved by rail to large dedicated sites such as Roxby, north of Scunthorpe. Rail access connections exist at Hessay near York and York north sidings. The use of these facilities would create minimal short distances for lorry movement plus requirement for compressing and baling of landfill waste. The following towns also have rail facilities which could be used for loading, Harrogate, Malton, Scarborough, Thirsk, Northallerton and Darlington. Network rail should welcome additional goods traffic and can develop siding facilities at minimal costs with train movement at night</p>
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Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
312 Clarke Plant Hire & Contractors	0054			Would like the retention of land restoration sites to deal with locally generated excavation waste.
121 Environment Agency	1286			It is valuable for the plan to acknowledge that waste management operates in an economic market and that regional self-sufficiency cannot always provide the flexibility to allow waste to be managed in the most sustainable way. However waste is also a resource and its treatment and use within the plan area is a potential benefit which can be planned for.
306 Redcar & Cleveland Council	1151	Q105		Support aim of self-sufficiency in waste management. Some movement of waste beyond boundaries may be required, including into the Tees Valley, especially in relation to specialist waste management. The cross boundary issues are likely to benefit from further discussion.
3001	1843	Q105		None of the options are ideal.
585 Green Hammerton Parish Council	0514	Q105		Preference for Option 2.  Export of waste solves the problem of trying to manage it in a large county. Arisings in the south could go to Leeds (South Yorkshire) and other markets while northern parts could use Tyne Tees capacity. Thus it would not be necessary to build additional huge capacity.
112 Highways Agency	0435	Q105		General preference for Option 1 as aims to meet the identified needs for waste arising in the area and meet net self-sufficiency where practicable. The SA indicates that Option 1 would have the greatest positive effect in terms of reducing transport impact which is supported.
422 Bilton-in-Ainsty with Bickerton Parish Council	0716	Q105		Preference for Option 2. There are existing and proposed schemes which could deal with the waste from the Joint Plan area so duplicate facilities are not required when the waste can be exported to other areas.
911 Tockwith & Wilstrop Parish Council	0081	Q105		Preference for Option 2. On the proviso that the import of waste into the area is minimal.
171 North Yorkshire Waste Action Group (NYWAG)	1022	Q105		Preference for Option 2. Export of waste solves the problem for a large County. Waste in the south could go to Leeds, south Yorkshire and other markets, while in the north could go to Tees Valley. This would avoid the need to build large additional facilities.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
92 Durham County Council	1798	Q105		<p>It would be preferable to provide for as much capacity as possible and achieve net self-sufficiency where feasible (option 1), whilst acknowledging that those specialist waste management needs will be met elsewhere.</p> <p>County Durham receives waste from the Joint Plan area and these movements are controlled by the market and often by contracts and economies of scale. There would be a danger in assuming that waste movements could be met at existing levels outside the Plan area if the Plan failed to provide flexibility to bring forward new sites.</p>
213	1901	Q105		<p>Option 3 is preferred. Waste volumes are difficult to predict, and treatment options are developing rapidly. Cooperation with adjoining authorities is vital to minimise cost. To seek to manage all (or most) of its waste within NYCC is inefficient. Capacity in neighbouring areas should be taken into account. New facilities should only be approved where there is a proven lack of capacity. The Sustainability summary for option 2 is not valid.</p>
2197 CPRE (Harrogate)	1112	Q105		<p>Preference for Option 2</p> <p>Include the provision of more recycling/recovery centres throughout the plan area, include landfill and land restoration wherever possible to meet sustainability objectives.</p>
231	2149	Q105		<p>Support Option 2, have no objection to Option 3 but it seems to adjunct to another option. Agree with the principle that self-sufficiency in waste may not be the most optimal and sustainable outcome. Would welcome the projected capacity in adjacent areas. The overcapacity in incineration has been highlighted by Government.</p>
157	0135	Q105		<p>All the options reflect a narrow approach and none are any good. Consideration should be given to developing an option which exports waste to facilities in other areas located near to waste arisings (i.e. north to Teesside).</p> <p>It is crucial to avoid developing AWRP which will provide an inflexible solution with huge capacity.</p>
766 Marton-cum-Grafton Parish Council	0540	Q105		<p>Option 3.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
116 Ryedale District Council	1181	Q105		The MWJP should aim to meet the identified needs within the Plan area, but where not possible due to the nature of waste for specialist treatment, or for proximity and cross border movements due to settlement distribution, it is recognised that there will be some movement of waste in and out of the Plan area. The council is not best placed to comment on whether there is a continued need to take waste from the Yorkshire Dales NP.
94 Craven District Council	2326	Q105		Option 2 plus Option 3 are appropriate and take account of the fact that waste and minerals markets do not reflect administrative boundaries and take account of the need for the export of waste from the Yorkshire Dales National Park.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1767	Q105		Support Option 1 and Option 3.  Adopt the proximity principle and ensure that waste from the North Yorkshire part of the Yorkshires Dales is managed within North Yorkshire.
1355	2183	Q105		Preference for Option 3
3013	2036	Q105		Preference for Option 2.
135 FCC Environment	0686	Q105		Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2180 Peel Environmental Limited	0258	Q105		<p>Preference for Option 1 and Option 3 (in combination) this approach would not result in over provision as the market would ultimately determine if there is a commercial case to bring forward new infrastructure.</p> <p>The following comments are also relevant to the approach:  The reasoned justification set out in paragraphs 6.22- 6.33 and in the options box (id43) is almost entirely focused on the management of LACW with little regard to C&amp;I collected and managed by the private sector. C&amp;I waste arisings are almost double that of LACW and the evidence base paper 'waste arisings and capacity requirements interim report (Oct. 2013) shows C&amp;I waste to be imported and exported to and from the Plan area in large quantities. Management of C&amp;I is far more complex than LACW as it is a commercial matter dictated by markets and driven by the cost and sustainable movements of waste that are the key determinants in the commercial viability of schemes for C&amp;I waste. As such its movements are very rarely restricted to administrative boundaries, which makes planning for its management extremely difficult. It is therefore an important consideration when identifying the 'Strategic role of the Plan in the future Management of Waste'.</p> <p>Its agreed that the Plan should provide for its own waste arisings. However, it should also be flexible enough to cater for the needs of more than just specialist waste management facilities, in particular the specific needs of C&amp;I facilities. Accordingly it should be recognised that it may not be possible to meet this requirement in full for each individual waste stream.</p> <p>Whilst seeking, as far as practicable, to maximise the area's self-sufficiency, there should be a recognition that due to market pressures and economies of scale, waste is likely to continue to be imported and exported during the lifetime of the Plan.</p> <p>The emerging plan and its evidence base recognised that there are movements of waste into and out of the Plan area, however, the actual position would appear to be unclear.</p> <p>It is essential that consultation with other WPA's to clarify the level of imports and exports to and from the Plan area.</p>
2236 Amey Cespa Ltd (Allerton Waste Recovery Park)	1265	Q106		<p>Include securing key strategic sites (as allocations) within the MWJP, specifically AWRP.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
157	0136	Q106		The obvious alternative is to adopt a modular approach and invest in higher technology waste treatments that provide value and jobs. Encouraging more facilities for re-use and recycling would provide benefits to the local economy and provide more jobs.
585 Green Hammerton Parish Council	0515	Q106		Invest in higher technology waste treatments that provide value and jobs.
766 Marton-cum-Grafton Parish Council	0549	Q106		It is ridiculous for the Council to seek to manage all (or even the majority) of its waste within its borders. Waste is a global commodity. The Council should require that any new waste facility will only be considered if there is a proven lack of capacity in the county and its adjoining areas.
171 North Yorkshire Waste Action Group (NYWAG)	1023	Q106		Dealing with waste totally within the Plan area is too limiting. Should invest in higher technology waste treatments that provide value and jobs. Encourage greater reuse and recycling which would benefit the local economy and provide more jobs than AWRP.
422 Bilton-in-Ainsty with Bickerton Parish Council	0717	Q106		Technology for waste management is changing rapidly. There is no reason to assume that further major improvement in waste management may not be forthcoming.
3001	1844	Q106		Do not import waste from other regions as it is best dealt with locally. Encourage the production of less waste and recycle more. Large numbers of HGVs would considerably add to carbon emissions. Landfill should cease, leading to a reduction in methane emissions which are harmful to the atmosphere.
2841 Scarborough, Whitby and Ryedale Green Party	0223	Q106		A presumption that waste will be dealt with as high as possible within the hierarchy, as long as that will not increase total carbon emissions involved. Sometimes will be more carbon effective to export the waste (especially if not far over the borders) but generally treatment closer to the point of origin is to be preferred.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1447	Q106		The accuracy of the import/export data is in doubt so not possible to choose an option.

**Section: 018: Meeting Future Waste Mangement Needs**

**Chapter: 6**

**Policy No:**

2804 0055 Take into consideration local issues when managing waste materials.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
286 Scarborough Borough Council	2397			There are no specific shortfalls identified in the Borough. The progress of the AWRP project will need to be kept under scrutiny as there is a possibility of this facility not coming forward due to on-going issues associated with the proposal and its funding.
2310 Commercial Boat Operators Association	0073			Consideration could perhaps be given to the carriage by water of waste derived fuel (RDF) to power stations and energy parks.
2310 Commercial Boat Operators Association	0074			Has the possibility been considered of moving waste out of York City Centre by water?
422 Bilton-in-Ainsty with Bickerton Parish Council	0713	6.14		NYCC should revisit the current assumptions on projections of population growth by independent sources.
215	1891	6.38		Excluding AWRP from the MWJP is irresponsible. AWRP is at odds with the vision and objectives and makes the consultation a mockery.
422 Bilton-in-Ainsty with Bickerton Parish Council	0718	6.38		If the work expended in producing the plan is to be meaningful a rapid assessment of AWRP should be undertaken in light of major changes in technology and changing habits (reduced packaging, improved recycling).
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1448	6.38		AWRP is fundamental to the Joint Plan and if it is not reviewed the Plan cannot be taken seriously.
585 Green Hammerton Parish Council	0516	6.38		Despite the procurement of AWRP being at a late stage it would make sense to measure the facility against the vision, objectives and sustainability criteria. Otherwise a great deal of work in these documents is meaningless and wasteful.
171 North Yorkshire Waste Action Group (NYWAG)	1024	6.38		The Plan assumes that AWRP is going to go ahead. AWRP needs to be measured against the vision, objectives and sustainability criteria that have been developed otherwise previous work will not be meaningful.
157	0137	6.38		The MWJP has a responsibility to develop a viable strategy for the 21st Century. By not reviewing the approach to LACW the MWJP is not fulfilling its responsibility. It is imperative to measure AWRP against the vision, objectives and sustainability criteria that are developed as part of the Plan.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
911 Tockwith & Wilstrop Parish Council	0082	6.38		We do not agree with this statement. It is based on the assumption that AWRP will be built and commissioned. Until it is we suggest such assumptions are theoretical and therefore a review of the approach to dealing with LACW without AWRP should be carried out as part of the MWJP in seeking to identify and consider all issues and options.
911 Tockwith & Wilstrop Parish Council	0083	6.39		Considers it unacceptable to base projections on a major development (AWRP) which is yet to be built and developed.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1449	6.41		How much of the LACW managed at AWRP will be incinerated?
231	2151	6.41		The scenario assumes the completion and performance to AWRP contract, this is a high risk assumption.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1450	6.42		Why are these Scenario's not options? These issues are what AWRP is based upon.
231	2152	6.44		Welcome that there are scenarios without AWRP. Need to consider another approach in case the plan is not running to contract in the near future or at all. In addition to having 'no capacity gap' there is a risk of a deficit of LACW to provide the Guaranteed Minimum tonnage to the facility. The MWJP should prevent this from impacting on waste management or policy.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1451	6.44		What is the point of asking for our opinion on LACW management whilst stating AWRP, which is the cornerstone of the strategy, is outside the influence of the MWJP.
422 Bilton-in-Ainsty with Bickerton Parish Council	0720	6.50		The case for incineration has never been demonstrated and large numbers of local residents have objected to this method of disposing of waste. The Plan appears to ignore the views of community tax payers.
215	1892	6.50		This deliberately underplays the strength of opposition to AWRP. Information provided about AWRP is confusing and so cannot lead to a meaningful debate regarding the project.
585 Green Hammerton Parish Council	0518	6.50 & 6.		The 'What you told us sections' make it sound as though opinion to incineration was 50:50 whereas 10,000 people signed a petition against incineration (AWRP).

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
157	0139	6.50 &6.		Consider the 'What you told us' section to be misleading. 10,000 people signed a petition against the AWRP development. The way that the representations are presented suggests option was fairly equal.
171	1026	6.51	North Yorkshire Waste Action Group (NYWAG)	Comments are misleading, there is very little support for AWRP and a large amount of opposition.
734	1454	6.55	Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	AD is a critical element of the MWJP if it is not over reliant on incineration.  Why waste the planning permission and North Selby Mine quashed?
734	1455	6.56	Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	This para suggests that if there were shortfalls in LACW AWRP would accept increased amounts of C&I waste, increasing rates of incineration.
96	0535	6.69	Cumbria County Council	There are no concerns or issues arising from the Plan and we are pleased to see the disposal of LLRW is being considered.  With regard to Para 6.69, radioactive waste must come from a nuclear source, so the first line would be better if it stated 'non-nuclear 'industry' sources'. Secondly, the low Level Waste Repository in Cumbria is 'near' Drigg, rather than at Drigg.
2310	0071	6.73	Commercial Boat Operators Association	Kellingley Colliery and Drax power station have the capability of using water transport, but not enough use is made of this, perhaps this potential can be reviewed.
3013	2037	Q107		Recycle/recovery Scenario.
92	1799	Q107	Durham County Council	The growth scenarios seem reasonable.
94	2327	Q107	Craven District Council	These appear to be reasonable scenarios. Minimised growth may not be realistic. There are high levels of uncertainty and sufficient flexibility needs to be in place.
911	0084	Q107	Tockwith & Wilstrop Parish Council	The Baseline scenario is flawed in that it is based on the premise that the proposed AWRP contract is implemented, when it has yet to be built. A contingency should be incorporated into the scenarios to cater for a situation in which the AWRP is not developed.
213	1902	Q107		No, do not agree. NYCC mineral industry required landfill to achieve re-instatement. There is no need to divert such a percentage of waste from landfill, especially inert waste which can be used for mineral restoration. Consider a scenario which maximises reuse and recycling of all waste types.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
231	2150	Q107		Projections of LACW growth have been inaccurate in CYC and NYCC waste policies since 2005. There is no indication of recent trends nor a scenario of 'reduced waste arising's' which would present a policy in favour of reuse and reclamation. Waste arising's have fallen since 2006 with changes in their composition. If these trends are not encouraged it will be a missed opportunity.
2197 CPRE (Harrogate)	1113	Q107		All scenarios are reasonable
766 Marton-cum-Grafton Parish Council	0541	Q107		No, do not agree. There is no need to divert such a high % of waste from landfill, especially if it is biologically inert and can be used to enable effective remediation of minerals extraction activity. To assume a minimum household waste diversion target of 50% is far too low. Propose a target recycling rate for household waste via kerbside collection should be a minimum of 60% and aspire to 70% by 2020.  Strongly support the maximum recycling scenario, plus higher household targets.
157	0138	Q107		The future scenarios are outdated, unrealistic and cover a very narrow range of possibilities.  The scenarios should include a much lower rate of increases in waste arisings. Take account of legal demands or national government recycling rates of 60% and 70%. Explore the possible future taxation regimes in order to understand the effect of financial viability. Criteria should be used to explore the difference between the various scenarios.
171 North Yorkshire Waste Action Group (NYWAG)	1025	Q107		The scenarios are unrealistic and cover too narrow a range of possibilities. Future scenarios should be more extensive and include lower rates of increase in waste arising's than projected. Need to take into account legal, EU and Government demands for recycling rates and financial implications. Regret criteria should be used to explore the difference between the various scenarios.
422 Bilton-in-Ainsty with Bickerton Parish Council	0719	Q107		Unable to comment due to lack of expertise

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2180 Peel Environmental Limited	0259	Q107		<p data-bbox="1068 156 2107 220">Supports the options for growth within the Plan, but do not support any of the options for future waste management practices.</p> <p data-bbox="1068 264 2107 400">Agree that a degree of flexibility should be built into the Plan. It is our view that future capacity requirements within the Plan should be based upon a worst case scenario which adopts the higher level of 'Growth' and the 'Baseline' / 'Median' Scenario for waste management practice.</p> <p data-bbox="1068 445 2107 655">It is noted that the 'Baseline' Scenario allows for LACW to be managed inline with the new residual waste management contract (AWRP). However the contract is yet to be signed and the delivery of the AWRP remains uncertain. In light of this, in order to ensure that full objectively assessed needs are met and in order to be flexible enough to deal with changes as required by national planning policy, the MWJP should plan for all of the required capacity to be met through a variety of options.</p> <p data-bbox="1068 700 2107 836">Objects to the fact that targets for C&amp;I waste within the 'median' and 'high' recycling scenarios only relate to 'mixed C&amp;I waste' This represents only circa 30% of the overall amount of C&amp;I waste arising in the Plan area and it is not clear what recycling, recovery or landfilling targets are being applied to the remainder waste stream.</p> <p data-bbox="1068 880 2107 1016">The grouping of C&amp;I waste with C&amp;D waste in these scenarios is not supported as they are distinctly different waste streams with very different characteristics an the assumed level of recycling for each should be presented separately in any assessment of any future capacity gap.</p> <p data-bbox="1068 1061 2107 1157">It should be noted that whilst broad support can be applied to some scenarios, it should not be inferred that support is given to the findings of the two Waste Arising's and Capacity Requirements evidence base documents.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1293	Q107		<p>Unclear as to the purpose of the recycling scenarios, need to be more clearly explained. It is useful to set down potential scenarios for the management of waste in North Yorkshire if the objective is to steer it in a particular direction.</p> <p>The maximum scenario of 75% recycling and 25% waste to energy is unlike the better performing countries in the EU where at present there is greater reliance on energy recovery. Achieving these levels would require strict adherence to the waste hierarchy in priority order, and would represent an aspirational target, if option 2 of ID42 was followed. Eunomia predict a rise to 65% recycling across the UK by 2020 in their November 2013 summary report, however it should be taken into account that to progress to higher levels of recycling is progressively more challenging as the 'easy to recycle' wastes have been removed from the waste stream.</p> <p>Current UK construction waste recycling rates are thought to already be in excess of the 70% target set by the EU, but evidence of this needs to be investigated and verified. In light of currently available data on construction waste 75% recycling is attainable. The median scenario is achievable in the short term and is close to being met in some sectors.</p> <p>It is acknowledged that North Yorkshire has particular challenges presented by low population densities and long travel distances with limited transport infrastructure which are not found elsewhere in the Yorkshire and Humber Region. Could future scenarios be informed by looking at similar situations elsewhere, for example the Scottish zero waste plan has stated targets of 70% recycling and 5% landfill by 2025?</p>
1355	2184	Q107		These are reasonable scenarios.
585 Green Hammerton Parish Council	0517	Q107		Do not have sufficient expertise to comment on the scenarios.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1768	Q107		<p>All of these scenarios are significantly weak in ambition for increased recycling rates. The Plan area has one of the highest amounts of household waste per household, and a recycling rate in the mid 40% (compared to best WPAs in England exceeding 60% and Flanders exceeding 75%). Wish to see greater efforts from NYCC and CYC (in collaboration with the Districts) on waste minimisation and recycling, composting and AD.</p>
2841 Scarborough, Whitby and Ryedale Green Party	0224	Q107		<p>Minimised growth: maximised recycling and recovery. Things will not continue as they are now, even if the 'green' argument does not win, the economic circumstances. Particularly energy sources, will probably lead to these scenarios.</p>

**Policy No:**              id44

546	Farnham Parish Meeting	0480		Encouraged by the on going increase in recycling and new collection ideas. Opposed to AWRP and its methodology for disposal of household and industrial waste.
1167	Hambleton Sustainable Development and Planning Policy	1227		The policy options should take into account the possibility of AWRP not proceeding. New proposals for incineration should be close to centres of population and/or commercial developments to utilise CHP. Any NYCC waste contracts should not include minimum waste inputs with penalties applied if missed, which is contrary to waste minimisation objectives.
2841	Scarborough, Whitby and Ryedale Green Party	0225	Q108	Option 2, especially support local processing of domestic kitchen waste and green waste.
911	Tockwith & Wilstrop Parish Council	0085	Q108	Preference for Option 2.
2197	CPRE (Harrogate)	1114	Q108	Preference for Options 1 and 2 preferred, both differing circumstances but offer joint benefits. AWRP is still uncertain, are there any alternatives if it falls through. Waste facilities are shown in the plan but their capabilities and availability are not. Prefer extensions to current landfill sites rather than an incinerator as long as do not impact on nearby residents.
766	Marion-cum-Grafton Parish Council	0542	Q108	Preference for Option 2. AWRP has not reached a final close, this question fundamentally undermines the consultation.
213		1903	Q108	Option 2 is preferred. This question is wrongly worded as it is constrained by an underlying assumption that AWRP will be built. Cooperation with adjoining authorities is vital to minimise cost. There are alternative strategies and waste treatment systems that could be developed including multiple MBT facilities in the county and RDF to Ferrybridge or Teesside.
116	Ryedale District Council	1182	Q108	Preference for Option1. It is not clear from the consultation whether all authorities will be expected to contribute (e.g. via CiL) to the costs of implementing strategic waste facilities. Further clarification is needed on this matter.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
157	0140	Q108		<p>While Option 2 would create some flexibility and enable more local solutions, it is inadequate. It should be extended to include options based on a modular approach that features a wider technology choice and consideration of export.</p> <p>Notes that while a preference is indicated this does not suggest it is the best option- it is the least bad of those presented.</p>
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1452	Q108		Option 2 is too vague and does not provide an alternative to Option 1.
171 North Yorkshire Waste Action Group (NYWAG)	1027	Q108		<p>Option 2 would create some flexibility and enable more local solutions, but it is inadequate. Need to develop more options based on wider technology choice and consider exportation.</p> <p>Option 2 is the least bad option.</p>
3001	1845	Q108		Neither Option
422 Bilton-in-Ainsty with Bickerton Parish Council	0721	Q108		There is more flexibility with Option 2 and local solutions.
330 Harrogate Borough Council	2388	Q108		Should the AWRP facility not go ahead it is important that a comprehensive review is undertaken to assess future capacity needs for LACW. Both options will address this issue but taking into account that planning permission has already been granted for the AWRP facility, which would provide for the management of residual LACW, support Option 1.
1097 Rufforth and Knapton Parish Council	1213	Q108		Preference for Option 1. Any Proposal for new capacity at Harwood Whin involving built environment needs to be judged not only against any relevant national and local green belt policy but also against earlier commitments and guarantees made by the LPA to cease operations at Harewood Whin and reinstate the area by 2017.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2180 Peel Environmental Limited	0260	Q108		<p>Although it is recognised that the Authorities are at an advanced stage in their procurement of a new residual waste contract and that planning permission has been granted for AWRP. The contract has yet to be signed and the delivery of AWRP remains uncertain.</p> <p>It is considered that the Plan should be developed on a robust and flexible basis in light of this and should not be predicated on the assumption that AWRP development would be implemented.</p> <p>Agrees in principle with option 2 as this provides greater flexibility in terms of delivering the necessary infrastructure for the management of LACW. But does not agree with the current wording and in particular the Joint Authorities general approach to the waste hierarchy.</p>
92 Durham County Council	1800	Q108		Given the rural nature of the area, a combination of options may be appropriate as the best solution for providing for LACW. This is especially the case given the need for transfer capacity in several districts.
585 Green Hammerton Parish Council	0519	Q108		Option 2 would create flexibility and enable more local solutions.
3013	2038	Q108		Preference for Option 2
94 Craven District Council	2328	Q108		A targeted approach provides for greater certainty so Option 1 seems appropriate.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1769	Q108		Given the Government decision to withdraw PFI funding from AWRP and the resulting uncertainty over its future feasibility, it is difficult to see how the Plan can be developed contingent on its development.
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1453	Q109		A ridiculous question.
2841 Scarborough, Whitby and Ryedale Green Party	0226	Q109		Yes, alternatives should be considered because they may be more environmentally friendly and less costly.
171 North Yorkshire Waste Action Group (NYWAG)	1028	Q109		The planning permission for AWRP should not have been granted, to prevent it going ahead alternative technology options should be considered, look to export LACW to existing capacity outside the County, invest in modern waste treatment methods to obtain greater value from the waste.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
128 Yorkshire Wildlife Trust	0762	Q109		Would support options which increase capacity for dealing with food waste and significantly reduced amounts reaching landfill.
585 Green Hammerton Parish Council	0520	Q109		Exporting LACW to existing capacity in the UK and Europe. Invest in modern waste treatment methods to obtain greater value from waste.
3001	1846	Q109		More co-operation and joined up thinking needed between authorities to avoid duplication and over provision. Sheffield Incinerator cannot source enough feedstock and needs to import it and Leeds CC also has Incinerator capacity. When recycling rates are improving AWRP will not be fit for purpose, being oversized, too expensive and too polluting.
422 Bilton-in-Ainsty with Bickerton Parish Council	0722	Q109		Make better use of existing or proposed facilities with spare capacity. Newer methods of waste treatment will provide a better solution and recovered materials can be reused.
215	1893	Q109		The planning permission for AWRP was flawed, arguments were dismissed or ignored and there was evidence of pre-determination by members of the Planning Committee. The scheme should have had a government call in. The lack of proper scrutiny of the proposal has incurred a high level of risk for future implementation of the development should it go forward.
157	0141	Q109		To avoid the financial and environmental disaster of AWRP consider: - A modular approach utilising a range of technologies - Exporting LACW to existing capacity elsewhere in the UK and Europe - Invest in modern waste treatment methods to obtain greater value from LACW - Develop a solution which offers good value for money.
766 Marton-cum-Grafton Parish Council	0544	Q109		Alternatives include development of a MBT type solution at Allerton Park and other sites in the County with RFD delivered to Ferrybridge or Teesside, or for end use at Kellingley EFW should that be granted permission.

**Policy No:** id45

1097 Rufforth and Knapton Parish Council	1214			The importation of Commercial and Industrial waste from outside the local area should cease and capacity at Harewood Whin restricted accordingly.
1167 Hambleton Sustainable Development and Planning Policy	1228			Ensure businesses are able to take part in recycling, currently financially unviable unless waste co-operatives are developed to reduce costs through economies of scale.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1294	Q110		Broad agreement with Option 2 as it does not erect artificial barriers to the movement of waste which could prevent it from being managed in the most sustainable way.
766 Marton-cum-Grafton Parish Council	0543	Q110		Objects to Option 1, because AWRP is primarily for Municipal waste, not C&I. The inclusion of C&I at the site only happened after it was apparent that 320ktpa is too large. The council has no legal requirement to collect and dispose of C&I unless asked to. Objects to Option 2 as this is also predicted on the development of AWRP with significant C&I waste.
585 Green Hammerton Parish Council	0521	Q110		Disagree with both Options. There is no need for NYCC to be involved in C&I waste which is already managed by existing waste management companies in a competitive market. The idea of adding hazardous waste to be incinerated at AWRP is in direct conflict with the Sustainability Appraisal aims of clean air and minimising climate change emissions.
94 Craven District Council	2329	Q110		Option 1 plus Option 2 preferred.
3013	2039	Q110		Preference for Option 1.
2841 Scarborough, Whitby and Ryedale Green Party	0227	Q110		Preference for Option 2
2753 Friends of the Earth - Yorkshire & Humber and the North East	1770	Q110		Support Option 1.  Subject to the viability of AWRP and due to the need to adhere to the proximity principle and prevent waste being imported into the area when it should be treated where it arises.
2197 CPRE (Harrogate)	1115	Q110		Do not agree with either option. C&I waste should not be imported and be dealt with in the authority it is generated in.
135 FCC Environment	0687	Q110		Preference for Option 1
116 Ryedale District Council	1183	Q110		Preference for Option 1.
112 Highways Agency	0436	Q110		No preference. Favour Option 2 as likely to have more positive implications in relation to transportation of waste given that it would support management of commercial and industrial waste from outside the Plan area where it can be demonstrated that the location proposed would present the nearest appropriate installation for the waste to be dealt with. This would minimise transportation miles associated with waste.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
92 Durham County Council	1801	Q110		A combination of options for C&I waste would provide flexibility for managing waste over the Plan period, and would acknowledge the flows which already exist. This would allow management of waste from other areas where this were the most sustainable approach.
213	1904	Q110		<p>Neither Option is appropriate, both ignore the views from earlier NYCC consultations. The decision to include C&amp;I waste at AWRP only arose when it became clear that the capacity of the facility is too large. C&amp;I waste is satisfactorily handled by the private sector.</p> <p>A third Option based on increased working with existing local and private companies to handle the recycling of C&amp;I waste with capacity already in the County or its immediately adjacent areas.</p>

2180 Peel Environmental Limited

0261

Q110

Generally supports the combination of Options 1 and 2 as this would provide the most flexible approach to the management of all waste streams. However there are a number of specific comments on the wording of the options in the supporting text and within the evidence base documents.

These are:

Paragraph 6.56 and bullet point 3 of option 1 identify the need for one additional facility. This approach, which assumes a worst case scenario and identifies a requirement for additional future capacity, is supported. Although it considered that the capacity gap for the recovery of C&I is not being accurately represented within the Plan or the Evidence base.

As the future of AWRP remains uncertain, in order for the Plan to be 'sound' it is considered a more flexible approach would be to continue to plan for all of the required capacity to be met through a variety of waste management options, and remove reliance on AWRP.

The information in the evidence base documents is unduly complex and the approach set out is difficult to follow. There is a lack of clarity or explanation on how many of the figures have been established and how the future capacity requirements have been calculated. This is compounded by the fact that reference needs to be made to two documents (interim and Final) rather than a consolidated report.

The scenarios are misleading, for example C&I on first reading it appears to assume a 100% diversion of C&I waste. However, upon further reading it appears that the scenarios only relate to 'mixed C&I waste (231,000 tonnes) (Table A10 of the interim report). However (according to Table 1 of the I&O document, there is 745,000 tonnes of C&I arising in the plan area. Therefore the scenarios adopted only equate to 30% of the overall C&I waste stream. It is considered that targets should be applied to the whole waste stream and not just a small percentage of it. What happened to the remaining 70% is unclear. Figure 7 and 8 of the Final waste arising's reports states that requirements have been calculated on the basis that between 200,000 and 300,000 tonnes would be landfilled each year. It is a national policy imperative that waste is managed as far up the waste hierarchy as possible and as a consequence the Joint Plan Authorities should be planning for as much waste to be either recycled or recovered as possible and this should be reflected in the future capacity requirements of C&I waste

Respondent Number/Name      CommentNo   Paragraph   Sites      Comment

stream.

At present the calculation of future capacity has not taken account of imported waste. If after further investigation these prove to be significant it should be included in future capacity and requirements calculations.

Considers there to be a misinterpretation of relevant policy and legislation and the plan should not place a requirement on developers to 'demonstrate' that waste recovered at the facility cannot be practically dealt with further up the waste hierarchy.

734	Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1456	Q111	Why does Option 2 include reference to importing C&I waste, which will result in increased vehicular movements into and across the Plan area?
585	Green Hammerton Parish Council	0522	Q111	Leave disposal of C&I waste to the existing market.
766	Marton-cum-Grafton Parish Council	0550	Q111	Recommend consideration of a third option which only considers developing additional C&I waste when it is demonstrated that adequate capacity is lacking already in the County or in immediately adjacent Counties.

**Policy No:**              id46

121	Environment Agency	1295	Q112	No preference, support solutions which maximise CDE waste minimisation and recovery.
112	Highways Agency	0437	Q112	Prefer Option 1 as Option 2 has potential to increase negative effects in relation to the transportation of waste through importing waste from outside the Plan area which could have greater impact on the SRN.
116	Ryedale District Council	1184	Q112	Preference for Option 1.
135	FCC Environment	0688	Q112	Preference for Option 1 and 2
3013		2040	Q112	Preference for Option 2
1577	Lafarge Tarmac	0977	Q112	Has no preference for either Option 1 or 2 as both facilitate the restoration of quarry voids with inert waste.
92	Durham County Council	1802	Q112	A combination of approaches could be the most appropriate approach. The recognition that this stream should be driven up the waste hierarchy is welcomed.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

2841 Scarborough, Whitby and Ryedale Green Party                      0228                      Q112                      Preference for Option 1

94 Craven District Council                      2330                      Q112                      Option 1 plus Option 2 preferred.

2197 CPRE (Harrogate)                      1116                      Q112                      Preference for Options 1 and 2 combined

2753 Friends of the Earth - Yorkshire & Humber and the North East                      1771                      Q112                      Preference for Option 1

115 Minerals Products Association                      1495                      Q112                      No preference for either option as both are positive in allowing restoration of quarry voids with inert waste which is dedicated for that need rather than rely on national capacity for landfill space.  
Most quarry reclamation/land recovery schemes are not run as commercial landfill sites as they are not viable as such, requesting that government will relax Defra and EA guidance which sees any inert importation into quarries as landfill. Many more quarries could be beneficially treated for recovery operations if current regulations changed to allow it. This would not compromise sustainability objectives or adversely affect the waste hierarchy.  
Any assistance the MPAs can give to encourage recovery schemes in quarries would be appreciated and would contribute to improved restoration and meet plan objectives.

**Policy No:**                      id47

766 Marton-cum-Grafton Parish Council                      0545                      Q114                      Option 2.

116 Ryedale District Council                      1185                      Q114                      Preference for Option 2.

2197 CPRE (Harrogate)                      1117                      Q114                      Preference for Options 1 and 2.  
Option 2 gives option for anaerobic digestion and the residual waste can be applied to the land, they can be suitably located to accommodate some food waste produced close to the farm, subject to the road networks being able to accommodate the increase in traffic.

213                      1905                      Q114                      Preference for Option 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
128 Yorkshire Wildlife Trust	0763	Q114		Would support Option 1. It appears there is a perverse incentive for on-farm AD units to use food crops grown specifically for use in these units. Such crops mean a loss of land for food crops and food sustainability in the UK. Planning conditions should specifically exclude the use of food crops for producing biogas.
3013	2041	Q114		Preference for Option 1
297 National Farmers Union	0092	Q114		Both Options could be used. Option 2 gives support to development of Anaerobic Digestion and should be welcomed.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1772	Q114		Preference for Option 2
3001	1847	Q114		Preference for Option 2
112 Highways Agency	0438	Q114		Prefer option 1 as it supports managing waste near where it arises increasing onsite management and reducing transportation resulting in a possible positive impact on the SRN.
2841 Scarborough, Whitby and Ryedale Green Party	0230	Q114		Preference for Options 1 and 2
121 Environment Agency	1296	Q114		No preference, key concern in the management of agricultural waste is that it does not cause pollution of water or have a detrimental impact on amenity. This can be managed through the application of locational criteria in PPS10 and through environmental permitting.
94 Craven District Council	2331	Q114		Option 1 and Option 2 preferred.
3001	1848	Q115		AD should be greatly encouraged. The methane gas produced can be fed into the grid and the biodigestate can fertilise the land. Recycling at its best.
766 Marton-cum-Grafton Parish Council	0546	Q115		Given the clear aspiration to treat agricultural waste locally, and the Councils inability to deliver food-separated household waste to AWRP, the proposed 40k tpa AD facility at AWRP is wholly inappropriate and should be dropped. Existing Capacity already includes a 60k tpa AD at north Kellingly and Leeming Bar 50k tpa.
<b>Policy No:</b>	<b>id48</b>			
2841 Scarborough, Whitby and Ryedale Green Party	0231	Q116		Preference for Option 1 as the levels are small



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3001	1849	Q116		Preference for Option 1
3013	2042	Q116		Preference for Option 1
2197 CPRE (Harrogate)	1118	Q116		Preference for Option 1.
116 Ryedale District Council	1186	Q116		Preference for Option 1.
911 Tockwith & Wilstrop Parish Council	0086	Q116		Preference for Option 1. Dealing with waste outside the Plan area is Preferred.
3001	1850	Q117		Fracking is likely to lead to the need for disposal of LLR waste, which is a reason for not allowing it to take place. Other risks include polluted water and escape of methane gas into the atmosphere having consequential negative results on the climate.
<b>Policy No:</b>		<b>id49</b>		
3013	2043	Q118		Preference for Option 1
3001	1851	Q118		Preference for Option 1
2841 Scarborough, Whitby and Ryedale Green Party	0232	Q118		Option 2, as the flexibility may be needed if expansion of existing sites is impossible, so it will allow for innovative forms of treatment.
94 Craven District Council	2332	Q118		Option 1 and Option 2 preferred. New sites in appropriate locations are acceptable in principle.
295 Northumbrian Water Ltd	0892	Q118		Preference for Option 2  Agree that any additional capacity required will likely be sought via expansion of existing sites. However, provision should be made to ensure sufficient flexibility for the demand for new facilities.
116 Ryedale District Council	1187	Q118		Preference for Option 2.
2197 CPRE (Harrogate)	1119	Q118		Preference for Options 1 and 2 New development will lead to higher levels of sewage sludge and the need for extended and new sewage treatment sites are already on-going issues.
128 Yorkshire Wildlife Trust	0764	Q119		Sewage Sludge and waste water needs to be seen as a valuable resource containing nitrate and phosphates. ( <a href="http://archive.defra.gov.uk/environment/quality/chemicals/achs/documents/phosphates-review.pdf">http://archive.defra.gov.uk/environment/quality/chemicals/achs/documents/phosphates-review.pdf</a> )

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3001	1852	Q119		All WWTW should use AD to deal with sewage sludge, so it may be necessary for current sites to be increased or new facilities to be developed near new housing/business development.  Not in favour of any increase in WWTW that arises from fracking in the region.
<b>Policy No: id50</b>				
968 Womersley Parish Council	0729			In relation to colliery spoil, the current NYCC policy (6/3) requires applicants to have undertaken a comparative study of alternatives using the 'Procedural Manual Evaluative Framework: Assessment of Alternative Colliery Spoil Disposal Options". There is no evidence this is undertaken in this area. This should be a pre-requisite of Planning applications relating to disposal of colliery spoil.
419 Scottish and Southern Plc	0897	Q120		Agree with Option 1.  Capacity at Gale Common & Brotherton Ings provide sufficient capacity for Ferrybridge C Power Station and would be supported.
1355	2185	Q120		Agree with the option.
3013	2044	Q120		Preference for Option 1
2197 CPRE (Harrogate)	1120	Q120		Preference for Option 1
213	1906	Q120		No do not agree. The planned handling of increased quantities of power station ash should be resisted. Generators of the material should be required to maximise treatment of ash to make it suitable for use in cement and road building and rendering it safe for landfill particularly for reinstating of mineral sites.
3001	1853	Q120		Agree
766 Marton-cum-Grafton Parish Council	0560	Q120		No. The planned handling of increased quantities of power station ash should be resisted. Ash is the by-product of incineration which is one of the least preferred options for waste treatment.
74 Selby District Council	1326	Q120		Supports the continued use of disposal of powers station ash at Gale Common, Barlow and Brotherton Ings ash disposal sites, which would be identified as Strategic Sites. Support the development of facilities at these sites to recycle ash and other by-products to reduce disposal.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

115 Minerals Products Association                      1496                      Q120                      Support Option 1 as support the increased availability of material for secondary aggregates if suitable.

766 Marton-cum-Grafton Parish Council                      0577                      Q121                      Adopt an alternative of minimising any increase in the quantity of power station ash by recycling waste landfilling with biologically inert material.

**Section:                      019: Waste Capacity and Safeguarding**

**Chapter:                      6**

**Policy No:**

734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council                      1457                      6.79                      The aim should be to use the proximity principle in every case.

121 Environment Agency                      1287                      6.87                      Pleased to see that groundwater protection is highlighted in this paragraph as a constraint to potential 'land raise' sites. Suggest that flood risk will also constrain this type of development, as no land raising shall take place in areas of flood risk (Flood Zone 3) unless like for like compensatory flood water storage can be provided, and it is demonstrated that flood risk elsewhere is not increased. Suggest the following wording: 'Groundwater pollution constraints and flood risk may be particularly important in determining suitable locations for some types of landfill and land raising activities'

734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council                      1458                      6.88                      National Policy supports the argument against AWRP, i.e. 'energy produced [from waste facilities] is used efficiently, preferably in the form of heat.

734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council                      1459                      6.91                      Access to the A1M was cited as one of the main reasons for selecting the AWRP site, but were 'alternatives to road transport' considered?

734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council                      1460                      6.92                      AWRP is contrary to 'using heat as a resource for EfW proposals' guidance in the PPS10 draft update.

**Policy No:                      id51**

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1097 Rufforth and Knapton Parish Council	1337			It is essential that site expansion is controlled to prevent unacceptable environmental and/or local amenity impacts. There is a danger at Harewood Whin that perceived "convenience" will overshadow environmental and amenity impacts.
2236 Amey Cespa Ltd (Allerton Waste Recovery Park)	1266	6.81		AWRP will treat LACW from NYCC and CYC therefore para 6.81 suggests that AWRP should correctly be identified as a Strategic Facility.
2180 Peel Environmental Limited	0262	Q122		Supports Option 1 and 4 in combination (limiting the development of waste management capacity to areas outside the NYMNPA and AONBs) as this would provide the most flexible approach.  Support is also given to the recognition within Option 2 that strategic scale facilities could come forward within the Plan area and it is agreed that these should be located where transportation impacts can be minimised. Therefore support is given to a combination of Option 1 with Part of Option 2.  The recognition that larger strategic scale facilities could come forward within the Plan is welcomed. Welcomes the recognition that not all waste must be dealt with within the Plan area.
766 Marton-cum-Grafton Parish Council	0561	Q122		Preference for Option 3, on the assumption that AWRP is not included when assessing this question.
422 Bilton-in-Ainsty with Bickerton Parish Council	0723	Q122		Use the principle of providing several smaller sites near the point of production of waste. Option 2 or 3 should be encouraged.
113 Howardian Hills AONB	1607	Q122		Support the addition of Option 4
157	0142	Q122		Support Option 2 or 3 in line with the 'proximity principle'. The options are limited and need to be redesigned to meet the need for maximal flexibility and avoid unnecessary environmental harm.
112 Highways Agency	0439	Q122		Prefer Option 2 and 3 as SA recognises that maximising use of existing sites and reduction of transport impacts are greater for these options. Particularly supportive of principles in Option 2 as would help reduce transportation.
1355	2186	Q122		Preference for Option 3
213	1907	Q122		Option 3 is preferred, providing the AWRP site is excluded because this conflicts with the objectives of increasing recovery re-use and recycling, treating waste where it is generated and minimising the distance waste is transported.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2197 CPRE (Harrogate)	1121	Q122		Preference for Options 1 and 3
585 Green Hammerton Parish Council	0523	Q122		Preference for Option 2 or Option 3 in line with the Proximity Principle.
120 English Heritage	0313	Q122		No preference regarding the three principal Options which have been put forward. Welcome Option 4 which seeks to direct waste developments away from the protected landscapes of the Plan area.
2841 Scarborough, Whitby and Ryedale Green Party	0233	Q122		Preference for Options 2 and 4.
94 Craven District Council	2333	Q122		Options 3 and 4 together are preferred, ensuring waste management needs are met within close proximity where possible.
116 Ryedale District Council	1188	Q122		Options 2 and 4 would be preferred. It is considered appropriate to make best use of existing facilities and to support provision of new facilities so that transport impacts are minimised. It is also considered that the inclusion of facilities in protected landscapes is not ruled out.
119 Natural England	0926	Q122		Preference for Option 4.
3013	2045	Q122		Preference for Option 3
171 North Yorkshire Waste Action Group (NYWAG)	1029	Q122		Option 2 and Option 3 in line with the proximity principle. Options are too limited to include the need for maximum flexibility and avoidance of environmental harm. AWRP should be excluded.
911 Tockwith & Wilstrop Parish Council	0087	Q122		Preference for Option 2. This option is preferred because it recognises and is much more consistent with the 'proximity' principle.
1541	2270	Q122		Preference for Option 3.  Waste sites should be local to waste arisings to keep transport costs down. One central major waste disposal facility is a mistake i.e. AWRP.
135 FCC Environment	0689	Q122		Preference for Option 3
231	2153	Q122		Options 1, 2 and 3 are nearly identical. The MWJP should express a preference for smaller scale facilities sited where they can offer flexibility and the greatest chance of being sustainable over major infrastructure. Suitably sized waste management facilities should not be automatically unacceptable inside AONBs and the National Park.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2760 White Quarry Farm	0821	Q122		Preference for Option 3 and Option 4. It is considered that this represents the optimum environmental solution to locate new waste sites as close as practically possible to sources of arisings and the strategic highway network. However there needs to be a general presumption against such development in the national park and AONBs.
128 Yorkshire Wildlife Trust	0765	Q122		Support Option 3 and 4. Potential landfill sites such as quarries which are valuable for biodiversity even outside national park should not be used for landfill.
215	1894	Q122		Yes, but the options, including the proximity principle, need to be pursued fully.
157	0143	Q123		Consider a modular approach along with a willingness to work with other WPAs and private sector to identify mutual benefits on site locations. This would reduce costs and financial risks.
766 Marton-cum-Grafton Parish Council	0562	Q123		AWRP should not be allowed to proceed as currently configured. The proximity principle is critical here and is being ignored by AWRP which cannot be described as proximal to the waste of an entire, rural, county.
585 Green Hammerton Parish Council	0524	Q123		Working with other waste authorities to identify mutual benefits on site locations.
120 English Heritage	0314	Q123		Whichever of the three Options set out in id51 is selected, the chosen strategy for strategic waste facilities should include, as part of its locational principles, the avoidance of those areas which would be likely to harm the environmental assets of the Joint Plan area. In terms of the historic environment, at a strategic level such developments should avoid locations which would be likely to harm the World Heritage Site at fountains Abbey/Studley Royal, Grade I and II Historic Parks and Gardens and the areas registered battlefields. When considering overall transport impacts of strategic waste facilities the strategy should favour those which it is possible to access by means other than road (i.e. rail/canal/river) if practicable.
74 Selby District Council	1327	Q123		Require further information. However, accept waste miles should be reduced by managing indigenous waste within SDC. Oppose importing waste to grow a waste facility, other organisations exist (Teesside). Expansions of existing sites are preferred to new sites. Site choice should be based on sequential approach i.e. waste stream, sustainability effects. Hazardous waste should be managed at source unless absolutely necessary.
171 North Yorkshire Waste Action Group (NYWAG)	1030	Q123		Working with other waste authorities and the private sector to identify mutual benefits on site locations could reduce costs and financial risks associated with excess capacity.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
422 Bilton-in-Ainsty with Bickerton Parish Council	0724	Q123		Maximise use of all local authority facilities to improve efficiency of operation. NYCC should not try to operate in isolation ignoring adjacent existing or proposed facilities.
422 Bilton-in-Ainsty with Bickerton Parish Council	0725	Q124		One facility for the whole of the Plan area may not be the best and most effective solution.
766 Marton-cum-Grafton Parish Council	0563	Q124		No.
2180 Peel Environmental Limited	0286	Q124		<p>What constitutes a strategic facility in the Plan area may not necessarily represent a strategic facility in other areas. Whether a facility is strategic or not has as much to do with the context of the plan area as it does the nature of the facility itself.</p> <p>East Sussex, South Downs and Brighton &amp; Hove produced a paper entitled 'Defining the Characteristics of Strategic Waste Management Facilities' this document suggests that there are a number of facets to the definition of strategic facilities which include, Anticipated throughput, scale and likely site requirements; and facility characteristics (traffic generation, emissions etc.).</p> <p>A further consideration should be the waste catchment area for the facility, in terms of whether it is considered strategic or not. If it serves more than just the plan area it is likely to be more strategic in nature.</p>
171 North Yorkshire Waste Action Group (NYWAG)	1031	Q124		Should not be any strategic facilities covering the whole of the North Yorkshire area. Correct strategy is to use export and commercial facilities coupled with several sites using modular approach for which some technologies are well suited.
585 Green Hammerton Parish Council	0525	Q124		There should not be any strategic facilities covering the whole of the North Yorkshire area.
231	2154	Q124		'Strategic scale' cannot be easily defined. Neither a 'strategic scale' nor the primacy of the major road network should be included in the plan.
157	0144	Q124		The misguided approach of a single facility covering the whole area should be abandoned in favour of a modular based strategy coupled with exports of waste where appropriate.
157	0145	Q125		The appropriate distance would depend on local geography and population density. The suggested 5km is a starting point.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
213	1941	Q125		The critical distance is that which enables recovery of CHP. 5km is reasonable, assuming the appropriate pipework does not cause adverse impacts on habitats, landscape and the environment.
2180 Peel Environmental Limited	0287	Q125		The approach in Option 3 is not supported. There is no evidence to support the introduction of a 5km criterion, it appears to be an arbitrary figure and it is not clear what the Council is seeking to achieve by it. The suitability of the road network is surely just as important as the proximity of the development to the primary road network.  Each site should be considered on its merits and the transport implications of a particular location should be placed in the overall planning balance for any given location.
94 Craven District Council	2334	Q125		A distance of 2km or below is preferred as this takes account of the rural nature of roads within the area.
171 North Yorkshire Waste Action Group (NYWAG)	1032	Q125		The appropriate distance may need to vary depending on local geography and population density, so the suggested 5km can only be a guideline.
766 Marton-cum-Grafton Parish Council	0564	Q125		The critical distance is that which enables recovery of CHP. The shorter the distance the better. No more than 3km is reasonable, assuming appropriate pipe laying schemes can be achieved without adverse landscape and environmental impact and assuming that the energy efficiency of schemes is not compromised by distance.

**Policy No:** [id52](#)

157	0124			Sand and gravel should only be extracted where adequate means of restoration have been identified. Some landfilling is needed for the plan to allow for this.
157	0125			A single county wide facility (AWRP) is not appropriate and it breaches the 'proximity principle'. Facilities should be appropriately scaled to meet local needs (excluding those of York) and designed to be unobtrusive.
157	0146			Site selection should take full account of the 'proximity principle', it should seek to minimise transport distances by road and make greater use of waterborne transport.  Site selection should not be carried out in isolation. It should take account of cooperation with adjacent authorities and other export opportunities.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2965	0647			<p>The policy should firmly adopt a long-term approach that works towards a zero-waste economy. Support for waste facilities should be conditional on its ability to play a part in delivering this.</p> <p>The Plan should contain a more fully formed plan B to take account of the non-delivery of AWRP.</p>
1097	Rufforth and Knapton Parish Council	1338		More emphasis should be placed on dealing with waste close to source. Major new developments, commercial or domestic should include waste management facilities of a suitable scale.
2180	Peel Environmental Limited	0288	6.92	<p>Agrees with the direction and approach the Joint Plan Authorities are advocating regarding the location of future waste management facilities.</p> <p>However paragraph 6.92 references the consultation draft of the updated national waste planning policy (July 2013). The paragraph highlights the suggestion that it would be appropriate to consider co-locating new EfW alongside sewage treatment works. It should be stressed that this is a draft concept which needs more careful consideration both in national policy and emerging local policy.</p> <p>The concept of co-locating new EfW facilities near high intensity energy users and major new mixed used developments where opportunities exist for private energy supplies is supported.</p>
2841	Scarborough, Whitby and Ryedale Green Party	0234	Q126	Preference for Option 2
2180	Peel Environmental Limited	0263	Q126	Option 1 is supported as this would provide a flexible approach that allows each proposal to be judged on its own merits in the context of local circumstances.
119	Natural England	0927	Q126	Preference for Option 2.
1541		2271	Q126	Waste sites should be local to waste arisings to keep transport costs down. Zero waste should be the aim, reducing, re-using and recycling as well as communal and home composting.
112	Highways Agency	0440	Q126	Prefer Option 2 and its local approach to the siting of waste activities, it will reduce the need for transporting waste over longer distances and so lessen the impact on the SRN. Particularly support the requirement of Option 2 to ensure consideration is given to a site's impact on the capacity of transport infrastructure and any cumulative impact from previous waste disposal facilities.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
911 Tockwith & Wilstrop Parish Council	0088	Q126		Preference for Option 1. Identifying criteria in National Waste Policy is preferred.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1773	Q126		Preference for Option 2
215	1885	Q126		AWRP incinerator would be against the proximity principle, would increase traffic levels and visually impact on the countryside.
120 English Heritage	0315	Q126		Favour Option 2. More robust approach than simply relying on general guidance provided by national planning policy. It would ensure that the strategy for identifying sites for waste management facilities is tailored to reflect the character of the Joint Plan area and the particular issues and challenges it faces.
213	1908	Q126		Option 2 is preferred. The identification exercise must be genuine and not arranged to reach a predetermined conclusion as was the case with AWRP.
231	2155	Q126		Support Option 2, colocation, end use of energy, brownfield-first and reuse of existing facilities are all important considerations. Should also consider non-road transport and proximity to arising's here as well.
2760 White Quarry Farm	0822	Q126		Preference for Option 2. Support the principle of setting local principles and the priority given to providing additional landfill capacity through the infilling of quarry voids with inert CD&E waste, especially as part of a wider reclamation program.
295 Northumbrian Water Ltd	0891	Q126		Preference for Option 1.  Less prescriptive and allows greater flexibility for the Council to bring forward sites to meet waste management needs across a range of facilities, having regard to national policy and locational criteria.
585 Green Hammerton Parish Council	0528	Q126		Preference for Option 1, as this provides flexibility. The national policy will evolve and it is important that NYCC is able to evolve. Much of the detail in Option 2 is common sense and will happen anyway.
2197 CPRE (Harrogate)	1122	Q126		Preference for Option 1
115 Minerals Products Association	1497	Q126		Support Option 2 because of its preference for the restoration of quarries with inert waste prior to consideration of other 'land reclamation' schemes.
116 Ryedale District Council	1257	Q126		Preference for Option 1.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1577 Lafarge Tarmac	0978	Q126		Preference for Option 2.  Due to preference for siting CD&E waste reuse and recycling facilities at active mineral workings, and restoration of quarries with inert waste.
94 Craven District Council	2335	Q126		Locally specific principles are considered to be appropriate.
3013	2046	Q126		Preference for Option 2
171 North Yorkshire Waste Action Group (NYWAG)	1033	Q126		Use proximity principle and minimise transport distances, make greater use of rail. Should analyse future demand for and benefit of RDF and likely regional capacity both to the north and south. Failure to do so means ignoring its sustainability credentials and opportunities to gain flexibility at a relatively modest cost.
766 Marton-cum-Grafton Parish Council	0565	Q126		Preference for Option 2.
171 North Yorkshire Waste Action Group (NYWAG)	1012	Q126		The proposed AWRP facility is inappropriate and is in breach of the proximity principle.
121 Environment Agency	1289	Q126		Prefer Option 2, however we would request that the following points are included within this option; - In accordance with the Environment Agency's Groundwater Protection 3 policy we would object to any proposals to landfill within a source protection zone 1 designation; - Any infilling of quarry voids with waste for landfill purposes should only be permitted when it can be demonstrated that any potential impacts to the water environment have been fully assessed and any potential negative impacts can be adequately mitigated against in an effective and sustainable manner, which results in no negative impact upon the water environment. - In order to achieve high levels of energy efficiency new energy from waste facilities will be expected to use combined heat and power (CHP). In order to achieve this, proposals for energy from waste facilities should be sited fewer than 15km from densely populated urban areas or large heat users. Proposals which do not meet these locational criteria will not be acceptable unless an end-user for heat can be found. (This point expands upon the second bullet point already included within option 2)
135 FCC Environment	0690	Q126		Preference for Option 2
585 Green Hammerton Parish Council	0529	Q127		Viewing waste as a resource will identify sites near work force availability and waste arisings.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2938	2364	Q127		The policy should express a strong preference for waste facilities which help bring about zero waste economy.
128 Yorkshire Wildlife Trust	0766	Q127		The actual and potential value of land used for waste facilities for biodiversity needs to be considered at an early stage. Brownfield land can be very important for biodiversity.
<b>Policy No:</b>	<b>id53</b>			
157	0147			The overall objective should be to minimise the risk. A single facility could go wrong. Adopt a modular approach through cooperation with WPAs.
2180 Peel Environmental Limited	0264			Supports the approach set out in Option 1. However the following should be noted: Agree the Plan should afford protection to 'strategic' waste management sites, it should not be limited to those for the management of LACW. When preparing a development control policy seeking to safeguard other waste facilities it should set a clearly defined buffer zone to prohibit encroachment from incompatible development. The policy should also include allocations for non-strategic waste facilities. The wording could consider setting a buffer zone depending upon the type and scale of development proposed and to bring this in line with other legislation and guidance (i.e. 250m around composting facilities, inline with EA permitting guidance)
1097 Rufforth and Knapton Parish Council	1339			Any Plan must include the completion and reinstatement of a facility such as Harewood Whin. There should be no open ended arrangement nor should there be dates for closure and reinstatement to which there is no intention of adhering. Expansion and Operation cannot go on ad infinitum and this must be reflected in the planning permission.
1541	2272	Q128		Preference for Option 2.  The Plan should not provide special safeguarding for these sites.
171 North Yorkshire Waste Action Group (NYWAG)	1034	Q128		The smaller the number of facilities the greater the risk. A single facility going wrong results in the whole system failing. A modular approach featuring facilities on several sites is less likely to result in system failure.
94 Craven District Council	2336	Q128		Prefer Option 1 as provides greater certainty.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0316	Q128		Favour approach based upon an amended Option 1. If the appropriateness of a strategically significant site has already been tested at Examination in Public or through the planning process then, in order to ensure that these sites are not sterilised by, or lost to, other forms of development, they should be identified and safeguarded in the Joint Local Plan. The safeguarding of these sites would help reduce the pressure for development of less suitable sites elsewhere in the County. Where waste management facilities are operating on sites which have not been specifically granted consent by the waste planning authority, than applications which would result in the loss of such a facility would be approved if the current or potential future use of the site as a waste management facility would be likely to result in harm to the environment or to the amenities of local communities.
585 Green Hammerton Parish Council	0530	Q128		Preference for Option 2 and national policy.  Disagrees with the recommendations for Option 1 which identifies Allerton Park as an existing strategically important site. Allerton Park is a former quarry, now landfill site, being restored to green field status. There are many such quarries in North Yorkshire and therefore it should not be considered a strategically important site.
135 FCC Environment	0691	Q128		Preference for Option 1
116 Ryedale District Council	1189	Q128		Preference for Option 2
115 Minerals Products Association	1498	Q128		Favour Option 2, all waste facilities that can be safeguarded should be.
2197 CPRE (Harrogate)	1123	Q128		Preference for Option 1
766 Marton-cum-Grafton Parish Council	0566	Q128		Do not support either option. This is because the strategic protection of a 'limited number of strategically significant sites for specific safeguarding' flies in the face of the entire tenet of the MWJP with its emphasis on appropriately scaled facilities, located close to where the waste is produced.
3013	2047	Q128		Preference for Option 1
766 Marton-cum-Grafton Parish Council	0567	Q129		Preference for Option 2. Large scale waste facilities with only road transport should not be supported. AWRP would be contrary to this policy.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

2236	Amey Cespa Ltd (Allerton Waste Recovery Park)	1268	Q129	As suggested in para 6.99, consideration must be given to waste safeguarding areas to prevent inappropriate development being constructed adjacent or close to key strategic waste management facilities, such as AWRP. An allocation should be accompanied with a safeguarding buffer zone, for example AWRP could be afforded a 300 metre standoff zone.
213		1909	Q129	Neither Option is supported because the strategic protection of a "limited number of strategically significant sites for specific safeguarding" appears to be designed to support AWRP.
231		2156	Q130	Only the continued functioning of existing sites should be safeguarded.
115	Minerals Products Association	1536	Q130	No
94	Craven District Council	2337	Q130	Strategic waste sites
969	Wykeham Parish Council	1404	Q130	Supports the retention and development of HWRCs, as any reduction in the level of provision would lead to fly tipping, placing the burden of responsibility upon, landowners, District Councils and the Police.

**Section:                      020: Non-Road Transport & Infrastructure**

**Chapter:                      7**

**Policy No:**

2823		2110		The use of underground conveyor (Sirius minerals potash site) is an excellent idea to avoid intrusion on the countryside.
734	Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1461	7.05	Why was Selby District not considered more seriously for the LACW EfW site, due to its strong rail and water transport links?

**Policy No:                      id54**

2965		0642		Carbon impacts of transport modes should be taken into account.
3001		1854	Q131	Preference for Option 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2145 Petroleum Safety Services Ltd	0794	Q131		Option 1 is preferred
231	2157	Q131		Option 2. Carbon impacts should be considered here and elsewhere in the Plan.
3013	2048	Q131		Preference for Option 2.
116 Ryedale District Council	1190	Q131		Where possible the use of alternative sustainable modes of transport should be encouraged. The requirement for a carbon assessment is considered appropriate. Therefore Option 2 is supported.
2253	2095	Q131		Support Option 2.  The carbon implications of any proposal should be considered.
1577 Lafarge Tarmac	0979	Q131		Preference for Option 1.  Considers Option 2 unworkable. Reiterates the MPA response which suggests that the insistence on Carbon Reports with every mineral proposal to be unreasonable.
2779 Pickering Civic Society	0049	Q131		Preference for Option 2
2180 Peel Environmental Limited	0265	Q131		Supports the approach set out in Option 1 and agree that, in line with national policy, the Plan should actively encourage the use of / development of infrastructure for alternative forms of transporting material, but only where it is viable and cost effective to do so.  Establishing sites with non-road transport infrastructure is very difficult (such as establishing slots on the network and suitable loading/ unloading times) and flexibility needs to be added into the wording of the policy to reflect this.  Disagrees with Options which currently appears to seek developers to actively justify in carbon terms the benefits of alternative forms of sustainable transport. Developers should not have to justify alternative sustainable transport options.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1499	Q131		Favour Option 1. Option 2 is unworkable. Insisting on carbon reports with every mineral proposal is unreasonable. The operational constraints on development and use of rail, water or pipeline facilities is well known and limited, so it is easy to identify where there is likely to be an alternative to road transport. Industry already carries out exercises to evaluate the benefits of moving mineral by conveyor as opposed to lorry on cost and environmental grounds, so there is no benefit in introducing carbon assessments into this methodology. Only in cases where it is evident that there is an alternative should any additional information be sought on them. Alternative transport modes should be developed where possible.
1541	2273	Q131		Preference for Option 2.  Carbon impacts of transport should be taken into account. One major site for incineration would be a mistake.
2968 York Green Party	2299	Q131		Preference for Options 1 and 2.  Carbon impacts of transport modes should be taken into account.
213	1910	Q131		Option 2. Sites with rail and canal access should be prioritised. The proximity principle should be decisive and multiple sites encouraged. Transport (by road) should be minimised.
1355	2187	Q131		Support the options given.
1033 CTC North Yorkshire	2258	Q131		Preference for Option 2
112 Highways Agency	0441	Q131		Support both options as seek a shift towards increased use of rail and water transport.
2994 Inland Waterways Association- West Riding Branch	1708	Q131		Support both options as they encourage companies to actively consider water transport rather than defaulting to road transport.
94 Craven District Council	2338	Q131		Support Options 1 and 2.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1774	Q131		Support Option 2



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2197 CPRE (Harrogate)	1125	Q131		Options 1 and 2 have benefits Safeguarding railheads at quarries is better than relying on road transport alone. Water transport is still used in some locations and should be preserved. The shift towards increased use of rail and water transport being inactive is disappointing as the facilities are in place. Double handling and speed is always going to be an obstacle. Road transport appears to be the main form of transport. Sites therefore need to be located in areas where roads can accommodate large HGVs.
2841 Scarborough, Whitby and Ryedale Green Party	0235	Q131		Yes
74 Selby District Council	1328	Q132		Support the use of existing rail and water networks in transportation of minerals and waste. Support Carbon Assessment, where it would add value. But economic, social and environmental assessments should also be made.
1167 Hambleton Sustainable Development and Planning Policy	1229	Q132		Carbon impacts of transport should be taken into account. Prefer sites located close to rail access, and then sites which reduce reliance on road transport.
3001	1855	Q132		Any new infrastructure using existing railheads should include the possibility for passenger transport where appropriate to relieve congestion on overburdened roads. Possibilities to improve rail infrastructure: Wensleydale Railway, requires minor investment to connect to the East Coast Line at Northallerton; reinstate the western end of the railway to Hawes and Garsdale Head to join with the Settle Carlisle Line; build new sidings on the Scarborough-York and Harrogate-York lines.
2966 Green Party	1559	Q132		Take into account carbon impacts of transport modes.
2937	1655	Q132		Carbon impacts of transport modes should be taken into account.
<b>Policy No:</b>		<b>id55</b>		
3013	2049	Q133		Preference for Option 2
2197 CPRE (Harrogate)	1126	Q133		Preference for Option 1
3014	1984	Q133		Prefer Option 1
112 Highways Agency	0442	Q133		Prefer Option 1 as provides strongest protection to all existing and future rail and wharf infrastructure. Particularly support infrastructure which could be utilised in the future to support new facilities.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
94 Craven District Council	2339	Q133		Option 3 takes account of what is realistic and does not result in unnecessary safeguarding.
115 Minerals Products Association	1500	Q133		Favour Option 1 as it is the closest to national policy which emphasises the safeguarding of potential sites as well as those existing. There are difficulties in safeguarding sites with no prospective current commercial interest against more lucrative land uses, the issue is one of degree. If there is a large number of sites then the selection of the best should be chosen for safeguarding in consultation with landowners and industry. Where prospective sites are scarce and supply is not likely to increase, only decrease, then would suggest a strategic approach of safeguarding all remaining sites could be justified.
1033 CTC North Yorkshire	2259	Q133		Preference for Option 1
2180 Peel Environmental Limited	0266	Q133		Supports Option 1.  Rail and wharf infrastructure can be expensive and hard to establish, therefore, where mineral extraction or waste activities cease, and there is no prospect of further minerals or waste related development, consideration should be given to the use of general rail freight distribution before being released for general use.
294 Canal & River Trust	0095	Q133		Option 1 would provide the most flexibility compared to both Options 2 and 3 in terms of future movements of minerals by waterways and use of existing wharfs. This would have a positive effect on ensuring that all possibilities for sustainable transport are safeguarded.  The movement of waterborne freight along inland waterways is supported.
2994 Inland Waterways Association- West Riding Branch	1709	Q133		Support Option 1.  Offers most flexibility. Lack of infrastructure is an issue when encouraging new water traffic. Wharfs can be used for other traffic in addition to minerals and once one is lost it is often difficult to replace.
2310 Commercial Boat Operators Association	0070	Q133		Option 1 is preferred to safeguard wharves. Any other option means the supply and number of available wharves is eroded over time, reducing the chance or effectiveness of using water transport. Sections 7.3 to 7.15 are generally supported.
2779 Pickering Civic Society	0050	Q133		Preference for Option 1

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2841 Scarborough, Whitby and Ryedale Green Party	0236	Q133		Preference for Option 1
231	2158	Q133		Option 3, it is a reasonable compromise.
128 Yorkshire Wildlife Trust	0767	Q133		Preference for Option 3.
1577 Lafarge Tarmac	0980	Q133		Preference for Option 1.  Best reflects national policy which emphasises the safeguarding of potential and existing sites.
116 Ryedale District Council	1258	Q133		Preference for Option 3.
3001	1856	Q133		Preference for Option 1
3001	1857	Q134		All options for future rail/waterways development should be preserved.

**Section: 021: Minerals Ancillary Infrastructure**

**Chapter: 7**

**Policy No: id56**

204	0023			The application at Whitewall for the asphalt plant, or something similar, must be approved. There has been a gap in the market identified and the use of this quarry will save road miles.
2145 Petroleum Safety Services Ltd	0795	Q136		Option 1 is preferred
1157 W Clifford Watts & Co Ltd	0623	Q136		Prefer Option 1 as would support locating ancillary minerals infrastructure at existing mineral extraction sites. However ancillary minerals infrastructure does not necessarily need to 'produce a value added' product based mainly on the mineral extracted at the site as suggested in Option 1. Existing minerals extraction sites provide an excellent location and infrastructure for most ancillary minerals facilities irrespective of whether they are based mainly on minerals extracted from the site at which they are located.
2841 Scarborough, Whitby and Ryedale Green Party	0237	Q136		Preference for Options 2 and 4

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0162	Q136		Option 2 strikes a balance between the sustainable location of processing facilities close to the source of their main raw material input whilst affording a high degree of protection to the National Park and the AONBs.
1135 Lightwater Quarries Ltd	0946	Q136		Support Option 1 as co-location of other operations at mineral sites is a logical and sustainable extension to the production output from such sites. Such sites should be afforded a full tier of policy protection to encourage developers to invest in sites where found
112 Highways Agency	0443	Q136		Prefer Option 1 as contains provisions to ensure the process or development would not significantly increase the overall amount of road transport to and from the site.
135 FCC Environment	0692	Q136		Preference for Option 1
115 Minerals Products Association	1501	Q136		Support Options 1 and 3, decisions in National Parks and AONBs on ancillary development should be based on a site by site assessment of impacts. May be possible to locate ancillary plant on mineral workings in sensitive areas without compromising the objectives of designation and would be wrong to say no to this as a matter of policy.
116 Ryedale District Council	1191	Q136		Preference for Option 1.
3013	2050	Q136		Preference for Option 2
2197 CPRE (Harrogate)	1127	Q136		Preference for Options 1 and 3
1577 Lafarge Tarmac	0981	Q136		Preference for Options 1 and 3.
				Proposals in National Parks and AONBs should be based on a site assessment. For instance it may be possible to locate ancillary infrastructure on mineral workings in sensitive areas without compromising the objectives of designations and it would be inappropriate to rule this out as a matter of policy.
94 Craven District Council	2340	Q136		Prefer Option 1 plus Option 4, as would protect designations within the National Park and provides greater flexibility outside the National Park.
3001	1858	Q136		Preference for Option 4
1033 CTC North Yorkshire	2260	Q136		Preference for Option 2 and 4.
119 Natural England	0928	Q136		Preference for Option 2 and Option 4.
113 Howardian Hills AONB	1608	Q136		Preference for Option 2.

**Policy No:**                      **id57**

135	FCC Environment	0693	Q138	Preference for Option 1
94	Craven District Council	2341	Q138	No preference between Options 3 and 4
116	Ryedale District Council	1259	Q138	Preference for Option 1
115	Minerals Products Association	1502	Q138	Favour Option 2, as it is not necessary to safeguard facilities on time limited mineral operations. Although Option 3 seems attractive it depends on judgements on likely threats which may be underestimated. Option 4 appears attractive but care would have to be taken in determining what alternative sites would be available, it would be required for developers of minerals infrastructure sites to provide an alternative and not merely suggest ones available unless the operator confirms there is not further need for it.
1577	Lafarge Tarmac	0982	Q138	Preference for Option 2.  It is not necessary to safeguard facilities on time limited mineral operations which will come to a programmed end.
2197	CPRE (Harrogate)	1128	Q138	Preference for Option 3
3013		2051	Q138	Preference for Option 3.
115	Minerals Products Association	1503	Q139	The MPAs should be aware that it is the last mineral use that should be safeguarded and not just an upstanding currently operational plant. The Plan should protect against unscrupulous landowners bringing a mineral use to an end and then claiming after a period of time that such mineral use is no longer protected.

**Section:**                      **022: Sustainable Development**

**Chapter:**                      **6**

**Policy No:**                      **id58**

113	Howardian Hills AONB	1609	Q141	Support Option 2 plus Option 3. The reference to major development test may be confusing.
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**Chapter:                      8**

**Policy No:**

1140	Sibelco	1702	8.05	The European Parliament is clear on the fact 'Natura 2000 areas do not a priori prohibit mineral extraction', this needs to be reflected in the Options
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3013		2052	Q141	Preference for Option 3
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**Policy No:                      id58**

119	Natural England	0929		Preference for Option 3.
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2921	The Strickland Estate	1395		<p>NPPF introduces 'presumption in favour of sustainable development', it is important that Local Plans consider the economic benefits that occur from minerals extraction. The MWJP must acknowledge the duty to consider the economic benefits that occur from mineral extraction.</p> <p>The NPPF acknowledges that potash is 'a nationally important mineral' and so necessary to meet society's needs.</p>
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2145	Petroleum Safety Services Ltd	0796	Q141	Option 2 is preferred.
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2841	Scarborough, Whitby and Ryedale Green Party	0238	Q141	Preference for Option 3
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1112	RSPB North	1743	Q141	<p>Support Option 3, the SA identifies positive effects for the landscape and environment of the National Park and AONBs. This is the best of the options for safeguarding biodiversity in line with the NPPF. Would also help secure wider environment and climate change adaptation benefits in line with national and local policy.</p> <p>Specifically need to retain the wording within Option 3 'within North York Moors National Park and the AONBs the starting point for any decisions will be ensuring that development is consistent with delivering sustainable development within the context of their statutory purposes' This is important as will help ensure that the plan policy is clear and in line with national legislation as well as national and local policies for the North York Moors.</p>
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Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2992 Friends of the Earth	1632	Q141		The Authorities need to recover their nerve and express their objection more explicitly and with greater resolve. AONBs deserve special protection but the majority of the population lives outside these areas. The Authorities should be much more assertive in their concern to protect the well-being of those communities and the countryside around them. These options are not credible. Do not support any of the options put forward.
1140 Sibelco	1703	Q141		The options do not properly reflect European Guidance.
116 Ryedale District Council	1192	Q141		Preference for Option 1.
128 Yorkshire Wildlife Trust	0768	Q141		Supports Option 3. Would need to ensure that this Option also protected SSSI's and other areas of high value for biodiversity outside national parks and AONBs.
295 Northumbrian Water Ltd	0893	Q141		Preference for Option 1.  Consistent with NPPF and supported at various local plan enquiries as being a sound approach to delivering sustainable development.
2982 Friends of the Earth	0666	Q141		The options are too long and hard to understand. The Authorities should be more assertive in its concern to protect the well-being of all communities and countryside in the Plan area.  No preference for any of the options. There is a contradiction between the NPPF directives and even the weakest definition of sustainable development. The options presented do not resolve those contradictions although Option 3 goes closest as it actually accepts that a presumption in favour of sustainable development may not be appropriate in some areas.  Note that the NPPF states that 'local plans should set out criteria to ensure that operations do not have unacceptable adverse impacts on matters such as the natural and historic environment or local amenities or human health'. This is a strong statement but the only way to 'ensure that operations do not have adverse impacts' is to have an extremely high bar to all forms of minerals development in the plan area.
2197 CPRE (Harrogate)	1129	Q141		Preference for Option 3
115 Minerals Products Association	1504	Q141		Favour either Option 1 or Option 2
112 Highways Agency	0444	Q141		No preference but supportive of the presumption in favour of sustainable minerals and waste development as supported by NPPF.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
362 Harrogate Friends of the Earth	1374	Q141		State emphatically from the outset that only a small minority of proposals are likely to meet agreed criteria for sustainable development and the authorities will work positively on those initiatives only.
121 Environment Agency	1291	Q141		Prefer Option 2, support the approach of working with stakeholders when assessing the viability of potential waste sites, this would allow the EA to work with applicants to ensure the scheme meets required environmental standards and allows the highlighting of any permitting issues which may influence the developments design.
3001	1859	Q141		Preference for Option 3
135 FCC Environment	0694	Q141		Preference for Option 1
1577 Lafarge Tarmac	0983	Q141		Either Option 1 or 2
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0163	Q141		Option 2 preferred. Whilst according with national policy promoting sustainable development this option would allow developers, consultees, communities and other stakeholders to engage early in the development process in order to promote mutually acceptable and balanced development in the Plan area.
362 Harrogate Friends of the Earth	1373	Q141		The Authorities need to recover their nerve and express their objection more explicitly and with greater resolve. AONBs deserve special protection but the majority of the population lives outside these areas. The Authorities should be much more assertive in their concern to protect the well-being of those communities and the countryside around them. These options are not credible. Do not support any of the options put forward.
2180 Peel Environmental Limited	0267	Q141		Prefers Option 1.
231	2159	Q141		Option 2. Would welcome a policy statement which recognises that minerals and waste developments affect conditions outside the Plan area, mainly through energy consumption, impacts on habitats and biodiversity and emissions. Need to take responsibility for national and global impacts.
2937	1926	Q142		The policy statement should recognise and take responsibility for the wider impacts of waste and minerals developments. Carbon emissions and other pollutants will have global effects and many aspects of activity will have regional, national and international effects.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3001	1860	Q142		Need to understand the meaning of sustainable development i.e. better lives for us does not mean worse lives for future generations by being careful with resources and not using them purely in pursuit of profit. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
2992 Friends of the Earth	1633	Q142		State emphatically from the outset that only a small minority of proposals are likely to meet agreed criteria for sustainable development and the authorities will work positively on those initiatives only.
2982 Friends of the Earth	0667	Q142		Should state from the outset that only a small minority of proposals are likely to meet the agreed criteria for sustainable development and the Authorities will work positively on these initiatives only.
1167 Hambleton Sustainable Development and Planning Policy	1231	Q142		Take responsibility for the wider impacts of waste and mineral developments, i.e. carbon emissions, pollutants, global effects. Estimate emissions of the proposal and potential impact this will have on climate change and subsequent impacts, e.g. deaths, lives negatively impacted.
2965	0643	Q142		The policy statement should recognise and take responsibility for the wider impacts of waste and mineral developments. Carbon emissions and other pollutants will have global effects, and many aspects of activity will have regional, national and international effects.
2968 York Green Party	2301	Q142		The policy statement on sustainability should recognise and take responsibility for the wider impacts of waste and minerals development. Carbon emissions and other pollutants will have global effects, and many aspects of activity will have regional, national and international effects which are governed by EU and UK legislation. Include a target for a progressive reduction in carbon emissions from minerals extraction and waste disposal.
1541	2274	Q142		The policy statement on sustainability should recognise and take responsibility for the wider impacts of waste and minerals development. Carbon emissions and other pollutants will have global effects, and many aspects of activity will have regional, national and international effects.

**Section: 023: Development Mangement Criteria**

**Chapter: 5**

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

**Policy No:**                      id66

2950 Blue Lagoon Diving & Leisure  
Ltd

0814

Most of the options specified state that environmental controls are/will be in place to protect the water course and the relevant agencies/departments will be in place to enforce this. Clear ownership is not in place at the moment, nor is responsibility robust enough to dictate who should be enforcing what. The run-off water from Womersley Tip has contaminated neighbouring businesses water courses but no action has been taken. More robust systems are needed to allow enforcement where required. There is a section on managing waste water in the document but no mention of dealing with run off water from tip sites, this needs to be included and also added to the monitoring regime.

**Chapter:**                      7

**Policy No:**                      id60

213

1911

Q146

Preference for Option 1.

**Chapter:**                      8

**Policy No:**

2180 Peel Environmental Limited

0269

Supports Option 2.

It should be noted that even if a site does have potential rail connection this does not necessarily mean connection would be viable due to factors such as capacity on the network or access to suitable infrastructure where materials are delivered to/from.

There is some merit in Option 3 of providing a standard criteria for those developments that are not significant generators of traffic, but could have an impact upon the highway network/safety. The use of a transport assessment for more significant developments is supported. The requirement for/ use of Green Travel Plans is only likely to be suitable for large scale developments.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
119 Natural England	0933	8.64		Supports the inclusion of the Managing Landscape Change's key ecological, geological, historic and landscape questions within the joint plan. These will assist applicants, decision makers and third parties to identify a proposals critical issues.
252 York Potash	1056	8.64		<p>The list of questions represents a basic level of information that all responsible mineral developers should be aware of at an early stage in developing their proposals.</p> <p>Each Local Authority should have local validation lists which could/should incorporate confirmation of these items. Simple reference can be made to the Multi-Agency Geographic Information for the Countryside (MAGIC) website as a starting point which will assist developers for non-urban projects.</p>
121 Environment Agency	1303	8.82		<p>In this paragraph the design of waste sites is raised as an issue to ensure that they have minimal impact upon the surrounding area. The EA request that it is highlighted that some aspects of the design will be determined by the permit application, and therefore this should be considered at the planning stage. For example, stack heights often need to be finalised at the planning stage in order for local authorities to determine visual impacts, however they may need to be altered at the permitting stage to satisfy air dispersion requirements. The wording provided below should be incorporated into this section:</p> <p>'At the planning application stage it should be noted that certain elements of design of waste sites may be influenced by permitting requirements. We therefore encourage tandem tracking of both planning permission and the environmental permit application, so that issues such as stack heights, for example, can be determined without the need for amendments to the planning application in the future.'</p>
2197 CPRE (Harrogate)	1138	Q167		Support the use of the good practice advice contained in the Managing Landscape Change project report

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
115 Minerals Products Association	1516	Q167		<p>Not having fully read the Managing Landscape Change Project, unable to give a detailed response at this time, but may do so later after further consultation with members. Have some initial questions about the report</p> <ol style="list-style-type: none"> <li>1. Question 4 asks 'what would seem to be the preferred location for the proposed mineral development within the wider area'. What happens if the answer to that question is not the site under consideration?</li> <li>2. How does an objective consideration of the preferred location within an area relate to an extension to an existing mineral operation over which there is little locational control?</li> <li>3. The Report strongly implies that extensive preapplication discussions will be mandatory and there will be extensive new requirements for supplying information in an 'integrated' way. Are any other categories of developer being required to supply such a wide range of information?</li> <li>4. The Report expects mineral operators to take action in areas outside of the application site to join up isolated habitats or carry out remedial landscape activities. What happens if an interest in the land surrounding the site cannot be secured?</li> <li>5. The Report seems to take a view of cumulative development which is contrary to past government definitions by viewing past restored mineral sites as a contributor to such cumulative effects. Where has this new definition come from?</li> <li>6. The Report seems to indicate that long term management of sites will be mandatory irrespective of whether the intended land use can be achieved within the statutory aftercare times. This would seem to go against the purpose of aftercare and its statutory basis.</li> </ol>
121 Environment Agency	1300	Q167		<p>Have no objections to the research questions mentioned in paragraph 8.64, however would be concerned if the validation requirements for each of the authorities is amended. If it is intended to amend the validation requirements, the EA would wish to see more detailed information on the proposed amendments.</p>
1577 Lafarge Tarmac	0994	Q167		<p>Refers to the MPA response. Supports the desire to use best practice advice but this needs to be balanced against the information required to be included in planning applications for minerals developments, e.g. Environmental Statements.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0172	Q167		The environmental research questions identified in the Managing Landscape Change project represent the current good (or normal) practice in the development of minerals applications. Since almost all such applications relate to EIA development these questions and considerations would normally emerge as part of the screening and scoping process. Notwithstanding this it is appropriate that the Joint Plan should take account of the advice contained in the Managing Landscape Change project as part of the preparation of planning applications.
120 English Heritage	0334	Q167		Endorse the use of good practice contained in Managing Landscape Change project to inform the preparation of planning applications. Evaluation of mineral and waste developments need to be based upon a robust assessment of the likely impacts they might have on the environment. The Managing Landscape Change study should assist this process
2210	1814	Q167		Yes, the joint plan should support use of good practice advice.
1112 RSPB North	1751	Q167		Supports the use of good practice advice contained in recommendations of the Managing Landscape Change project because the project helps to <ul style="list-style-type: none"> <li>- ensure environmental considerations can be considered on an equal basis with social and economic considerations.</li> <li>- inform the assessment of environmental constraints and potential sites</li> <li>- inform the identification of appropriate development management policies relating to mineral extraction and the environment, including policies and approaches to mitigate the impacts of mineral working.</li> <li>- guide implementation of environmental policy including post-quarry restoration strategies.</li> <li>- enhance the understanding of the environment of areas of surface minerals resource potential amongst the minerals industry and the public.</li> </ul>
116 Ryedale District Council	1201	Q167		Supports the inclusion of the good practice advice for the preparation of planning applications contained within the Managing Landscape Change Project.
3013 <b>Policy No:</b> <b>id59</b>	2105	Q167		Support the use of the MLC project report
135 FCC Environment	0695	Q143		Preference for Option 1
1577 Lafarge Tarmac	0984	Q143		Preference for Options 1 and 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3013	2053	Q143		Preference for Option 2
116 Ryedale District Council	1193	Q143		Preference for Option 1 and 2.
2197 CPRE (Harrogate)	1130	Q143		Preference for Option 1
2145 Petroleum Safety Services Ltd	0797	Q143		Option 2 is preferred.
2253	2096	Q143		Preference for Option 2.  Early community engagement is important.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0164	Q143		Option 2 is preferred. Hopefully this option would encourage community involvement whilst reducing the number of uninformed objections.
3001	1861	Q143		Preference for Option 2
2982 Friends of the Earth	0668	Q143		Favour Option 2 but replace the word 'encourage' with 'require' and this should be a condition of the planning process. There should be additional requirements for developers to invest in local renewable energy initiatives Despite the use of the word 'includes' Option 1 should state a fuller list of unacceptable effects such as increased flood risk.
1112 RSPB North	1741	Q143		Support Option 2 as would provide additional greater positive effects by supporting the involvement of local communities.
74 Selby District Council	1329	Q143		Support Options 1 and 2.
713 Kirkby Fleetham with Fencote Parish Council	1415	Q143		Option 2 only sensible option, applicants should be required to engage with local communities prior to submission of an application.
2841 Scarborough, Whitby and Ryedale Green Party	0239	Q143		Preference for Options 1 and 2
2753 Friends of the Earth - Yorkshire & Humber and the North East	1775	Q143		Support Options 1 and 2

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1292	Q143		<p>Pleased that both options ensure that the protection of local amenity will be a priority and that the cumulative impacts of locating waste developments in close proximity to each other will be assessed. The issue of cumulative impacts could impact upon waste sites via planning and EA Environmental Permitting Regulations, as any new waste site in close proximity to an existing site may be required to utilise more stringent environmental mitigation measures to ensure its cumulative impact does not exceed acceptable environmental levels on issues such as air pollution. The plan should highlight this.</p> <p>Also, the text for Id59 states that the effects on the 'local' amenity will need to be assessed. Suggest that this is broadened to 'local and surrounding' amenity, as some of the potential impacts listed may actually have a greater impact upon areas outside of the immediate locality of the facility, for example air pollution may have no impact upon the adjacent land due to the height of dispersal stacks, but it may impact areas outside the local area.</p> <p>Offer more support to option 2 which includes early liaison with local communities, as we feel this has the potential to reduce any future complaints from communities regarding waste activities, as they will have a more informed understanding of what activities may be undertaken at the site.</p>
2992 Friends of the Earth	1634	Q143		<p>Despite the use of the word 'includes' Option 1 should state a fuller list of unacceptable effects.</p> <p>Prefers Option 2 if the use of the word 'encourage' is replaced by 'required' and that this should be a condition of the planning process. There should be a requirement for developers to invest in local renewable energy initiatives.</p>
2180 Peel Environmental Limited	0268	Q143		<p>Supports Option 1.</p> <p>It is considered that the overall wording of Option 2 would effectively duplicate other policies and requirements already placed upon developers.</p>
362 Harrogate Friends of the Earth	1375	Q143		<p>Despite the use of the word 'includes' Option 1 should state a fuller list of unacceptable effects.</p> <p>Prefers Option 2 if the use of the word 'encourage' is replaced by 'required' and that this should be a condition of the planning process. There should be a requirement for developers to invest in local renewable energy initiatives.</p>
94 Craven District Council	2342	Q143		<p>No preference given to either option as both appear reasonable.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
112 Highways Agency	0445	Q143		No preference. Transport and traffic impacts should also be considered as part of the criteria for demonstrating unacceptable effects of a proposal, including cumulative traffic impact alongside the Plan's other development proposals and those within other relevant local plans.
115 Minerals Products Association	1505	Q143		Support either Option 1 or Option 2, the approach is best practice for engaging with communities and reducing/minimising the environmental burden of mineral working.
250 Dart Energy (Europe) Ltd	0847	Q143		Concerns about the wording of option 1. It may not be possible to demonstrate that unacceptable effects will not arise prior to mitigation, this approach is in line with the NPPF. Also need to consider the benefits of development, including the need for minerals, employment, supporting low carbon development when deciding if development is acceptable. These should be included in the final policy.  Amend to read "... demonstrated that following mitigation, no unacceptable effects (including cumulative effects) on local amenity will arise, also having regard to the benefits of the proposal."
362 Harrogate Friends of the Earth	1376	Q144		The Proposals in the MWJP are in addition to a number of other large scale proposals (housing developments, AWRP and Flood defence schemes). The cumulative impacts of benefits of all proposals must be assessed together as a complete picture.
3001	1862	Q144		Even if companies have meaningful discussions with local communities, this should be accompanied by an assessment of the potential impacts upon the environment and climate etc.
2992 Friends of the Earth	1635	Q144		The Proposals in the MWJP are in addition to a number of other large scale proposals (housing developments, AWRP and Flood defence schemes). The cumulative impacts and benefits of all proposals must be assessed together as a complete picture.
546 Farnham Parish Meeting	0479	Q144		Encourage ways of protecting local communities from traffic and noise, as well as pollution from any works within or close by these areas.
2982 Friends of the Earth	1342	Q144		Proposals are in hand for large scale housing developments, AWRP and on-going flood defence schemes. The minerals and waste developments would be in addition to these. The whole picture of development should be evaluated in order to be able to adequately assess cumulative risks and benefits. Engaging with local communities on a piecemeal basis is inadequate. The Authorities are allowed to consult on the full range of proposals taken together and should state that here.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
713 Kirkby Fleetham with Fencote Parish Council	1416	Q145		Within the local amenity policy any developer should be encouraged, through extra planning means, to help with financial support for the local community.
2992 Friends of the Earth	1636	Q145		Yes. In addition policies should take account of the cumulative effects of mineral extraction on wider matters such as transport systems, the extraction of more than one mineral, and its transportation and the health of those living nearby.
115 Minerals Products Association	1535	Q145		No
1112 RSPB North	1742	Q145		As well as preventing adverse effects the options should specifically seek to improve local amenity in the long term, e.g. through the increased provision of formal and informal access.
2982 Friends of the Earth	1343	Q145		The list of possible adverse effects should be longer. The policies should take into account the cumulative effects of minerals extraction on wider matters such as the transport system, the extraction of more than one type of mineral and its transportation and the health of those living nearby and along transportation routes.
969 Wykeham Parish Council	1402	Q145		Acknowledge that minerals can only be worked where they are found. Does not wish to see any workable deposits sterilised providing: structures are designed to the highest possible standards, particularly within the National Park; protect natural environment both above and below ground; high standard of restoration is implemented as soon as possible following working; significant contribution is made to local community affected by working via CIL, other Planning Obligations or a Trust Fund, allowing road improvement noise attenuation and community and environmental schemes.
2180 Peel Environmental Limited	0406	Q145		Consideration should be given to including a high standard of design as an overarching matter and give consideration to the inclusion of lighting to the list of criteria.
362 Harrogate Friends of the Earth	1377	Q145		Yes. In addition policies should take account of the cumulative effects of mineral extraction on wider matters such as transport systems, the extraction of more than one mineral, and its transportation and the health of those living nearby.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0165	Q145		Possibly a reference is required to the need to avoid duplicating statutory controls which are the responsibility of other agencies.
3001	1863	Q145		The promise of local funds should not override environmental and climate change issues. The Government should not be allowed to override community decisions due to lack of an energy policy. LPAs should encourage renewable energy schemes.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

**Policy No:**                      id60

1355		2188	Q146	Preference for Option 1
362	Harrogate Friends of the Earth	1378	Q146	Do not agree with any of the options as none offer 'sustainable development'. None of the options seem to allow for development proposals to be turned down on the basis that there is negative impacts on transportation, sometimes allowing the 'least worst' proposal is not good enough.
2982	Friends of the Earth	1344	Q146	Do not agree with any of the options as none of them offer sustainable development that will protect the interests of future generations. None of the options seem to allow for development proposals to be turned down on the basis that there is sometimes a negative impact on transportation, allowing the 'least worst' proposal is not really good enough.
120	English Heritage	0317	Q146	Favour Option 1. The plan should be seeking to prioritise minerals and waste developments which can be accessed by means of non-road transport. Where this is not practicable then proposals should accord with the principles set out in Option 3.
2197	CPRE (Harrogate)	1131	Q146	Preference for Option 3
115	Minerals Products Association	1506	Q146	Option 2 is closest, with the exception of a requirement to demonstrate location to markets. The adoption of a southwards and northwards distribution area for aggregates already takes this into account, so no need to justify it again when a planning application is made. For other minerals closeness to market will be constrained by geology but the cost of transport will always favour the nearest suitable location. One solution could be to require the substance of Option 2 for waste developments but take a more realistic approach to minerals development. The possibilities for modal shift are limited so if Option 1 chosen it would not lead to any significant results. Option 3 is also generally acceptable with the exception of a transport assessment demonstrating modal shift opportunities which are considered unnecessary. Green travel plans are also largely irrelevant to minerals development in often isolated rural locations.
1541		2275	Q146	Preference for Option 1 and 3.  Carbon impacts of transport should be taken into account and road transport, especially of waste, should be minimised.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
231	2160	Q146		Preference for Option 1 plus 3.
116 Ryedale District Council	1194	Q146		Options 1 and 3. Additional criteria should be included to mitigate transport impacts.
135 FCC Environment	0696	Q146		Preference for Option 2
2994 Inland Waterways Association- West Riding Branch	1710	Q146		Support Option 1.  Encourages companies to actively consider water transport rather than defaulting to road transport.
1112 RSPB North	1744	Q146		Support Option 3, The SA indicates this will result in additional positive effects for the local environment, climate change and communities.
713 Kirkby Fleetham with Fencote Parish Council	1417	Q146		Options 1 and 2 are not exclusive, preference should be given to non-road transportation, where this is not practicable Option 2 comes into play. It is self-evident that option 3 should apply. Traffic must be kept out of settlements.
2841 Scarborough, Whitby and Ryedale Green Party	0240	Q146		Preference for Options 1 and 3
766 Marton-cum-Grafton Parish Council	0568	Q146		Preference for Option 1
2753 Friends of the Earth - Yorkshire & Humber and the North East	1776	Q146		Preference for Option 3  Particularly in relation to water intensive activities related to unconventional hydrocarbons.
3013	2054	Q146		Preference for Option 3
2992 Friends of the Earth	1637	Q146		Do not agree with any of the options as none offer 'sustainable development'. None of the options seem to allow for development proposals to be turned down on the basis that there is negative impacts on transportation, sometimes allowing the 'least worst' proposal is not good enough.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0166	Q146		Option 2 is preferred. As far as the transport of minerals is concerned this represents the more practicable option since, within the Plan area, mineral resources are, by their very nature, mostly located away from rail or water transport networks. Where both resources and markets can be served by rail or water transport, without adding unacceptable additional costs, the use of these alternatives should be encouraged. The criteria set out in Option 3 represent current best practice as already applied by responsible operators.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1111 The Coal Authority	0879	Q146		<p>It is considered that a single approach cannot be developed across all minerals and waste proposals.</p> <p>Option 1 would affect flexibility due to the limited range of non-road transport infrastructure available in the Plan area. Option 2 could apply to non-energy minerals where proximity to the market may be an appropriate consideration.</p>
2145 Petroleum Safety Services Ltd	0798	Q146		<p>Option 3 is preferred, however the text should make reference to all other equipment and materials required in connection with the development.</p>
94 Craven District Council	2343	Q146		<p>Options 2 and 3 together considered appropriate. This recognises that views out of National Parks are important to their scenic beauty.</p>
112 Highways Agency	0446	Q146		<p>Prefer Option 1 combined with Option 3 as considered to provide the strongest policy direction for prioritising more sustainable non road transport of minerals and waste. The criteria set out in Option 3 would ensure that where proposals would give rise to movements on the road network, including the SRN, that appropriate consideration is given to potential impact on the network, the ability of the network to support extra capacity and where adverse impacts arise mitigation would be delivered.</p> <p>Would welcome the inclusion of the requirement of a transport assessment to be provided in support of the proposals. Any capacity enhancements and infrastructure required to facilitate the delivery of the Plan's development should be identified during the preparation of the Plan to provide the best opportunity to consider the infrastructure needs and negates the need to consider proposals for infrastructure improvements at the planning application stage.</p>
1577 Lafarge Tarmac	0985	Q146		<p>Preference for Option 2 with the exception of the requirement to demonstrate location to markets. The southwards and northwards distribution area for aggregates already takes this into account. For other minerals, closeness to market will be constrained by geology but the cost of transport will favour the nearest suitable geological location.</p> <p>Location of markets could be appropriate for waste developments but a more realistic approach should be provided for minerals developments.</p> <p>Option 3 also supported with the exception of requirements for a transport assessment demonstrating modal shift opportunities and Green Travel Plans which are unnecessary.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
252 York Potash	1049	Q146		Support a combination of Option 1 and Option 3.  It is considered that Option 2 is not workable in respect of the York Potash Proposals due to lack of choice for surface infrastructure locational and existing transport infrastructure.
250 Dart Energy (Europe) Ltd	0848	Q147		This section relates solely to vehicular movements. There is no discussion relating to gas or transportation of gas via pipelines. This should have consideration.
362 Harrogate Friends of the Earth	1379	Q147		There is very limited canal system in the Plan area. Although we would support the increased use of rail transport, this again is very limited and extending routes is unlikely to be feasible. It is therefore extremely difficult to see what viable alternative there is to road. Existing road networks area already over crowded, public bus services are being reduced which will result in more people taking cars, AWRP will increase HGVs. Allowing additional minerals and waste development will compound this growth in traffic. North Yorkshire roads cannot absorb large increases in traffic.
2966 Green Party	1560	Q147		Take into account carbon impacts of transport modes.
252 York Potash	1050	Q147		York Potash intends to move production minerals via subterranean conveyor system. Installation of conveyors below ground is very capital intensive and will only be appropriate for higher value products extracted over a considerable period, the policy should recognise the sustainability credentials of using this method of transport in relevant circumstances, in similar ways to pipelines and canals.
231	2194	Q147		One additional criteria would be the carbon impact of transport. If vehicles powered by carbon-neutral electricity are used then road transport can have a lesser impact than rail. Green travel plans are rarely effective.
1167 Hambleton Sustainable Development and Planning Policy	1230	Q147		Carbon impacts of transport should be taken into account. Prefer sites located close to rail access, and then sites which reduce reliance on road transport.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2992 Friends of the Earth	1638	Q147		There is very limited canal system in the Plan area. Although we would support the increased use of rail transport, this again is very limited and extending routes is unlikely to be feasible. It is therefore extremely difficult to see what viable alternative there is to road. Existing road networks area already overcrowded, public bus services are being reduced which will resulting more people taking cars, AWRP will increase HGVs. Allowing additional minerals and waste development will compound this growth in traffic. North Yorkshire roads cannot absorb large increases in traffic.
2968 York Green Party	2300	Q147		Carbon impacts of transport modes should be taken into account.
2982 Friends of the Earth	1345	Q147		Limited canal system so this is unlikely to be suitable for the transportation of minerals and waste. Encourage more use of rail transport, but limited coverage of railways in the Plan area and extending these is unlikely to be feasible, so difficult to see any viable alternatives to road transport. The existing road structure will not be able to support a large increase in traffic and other types of development will impact on the road use. These is increased economic activity and tourism which also increase road usage. The plan area cannot absorb large increases in traffic so minerals and waste development is unsustainable.
713 Kirkby Fleetham with Fencote Parish Council	1418	Q148		A key consideration for any development is movement of traffic through settlements.
1112 RSPB North	1745	Q148		Criteria for Option 3 should include an assessment of any potential adverse effects on international and national nature conservation designations. Where there is shown to be an adverse impact on these designations, either the development on its own or in combination with other development, then the proposal should not be permitted.
2992 Friends of the Earth	1639	Q148		There needs to be better control/policing of the movements of HGVs on the roads. Too often large vehicles use unsustainable roads to avoid traffic jams or cut their mileage marginally. There are air quality issues that have not been dealt with and pollution continues to rise.
2937	1929	Q148		Carbon impacts of transport modes should be taken into account.
362 Harrogate Friends of the Earth	1380	Q148		There needs to be better control/policing of the movements of HGVs on the roads. Too often large vehicles use unsustainable roads to avoid traffic jams or cut their mileage marginally. There are air quality issues that have not been dealt with and pollution continues to rise.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

115 Minerals Products Association                      1507                      Q148                      We do not favour this approach in its entirety

94 Craven District Council                      2344                      Q148                      This option covers all necessary criteria.

2965                      0646                      Q148                      Carbon impacts of transport modes should be taken into account.

2982 Friends of the Earth                      1346                      Q148                      Needs to be better control/policing of the movements of HGVs on the regions roads. Already serious air quality issues (AQMA's) in the Plan area that have not been dealt with and pollution continues to rise. The road infrastructure is already at capacity.

**Policy No:**                      id67

1101 Yorkshire Geological Society                      0179                      It is interesting to see the use of the Managing Landscape Change Study within the Plan as it sets out good practice advice on minerals site design, operation and reclamation. Mineral working often provides opportunities for geological study and the retention of such features in restoration schemes is important as well as their long term care and management. The recognition of the value of geodiversity in reclamation design is a welcome feature, especially in circumstances where there may be insufficient inert material for restoration, geological conservation opportunities can provide sustainable solutions provided these are included within the ROMP process.

1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)                      1573                      The NPPF makes reference to 'restoration' of mineral working sites. This word implies that a site would be returned to its previous state. The consultation document confuses the concept of restoration with reclamation and reuse, which are not referred to in the NPPF. On that basis the MWJP should provide for a presumption in favour of 'restoration' before other options are considered to be acceptable. We are concerned that the positive effects that may accrue from reclaiming a site (e.g. biodiversity, re-use of materials) are not attached with undue weight in considering the principle of whether to restore the site to its previous use, appearance and level.

74 Selby District Council                      1332                      Q168                      Supports Options 1 and 2.

Stronger positive effects for biodiversity, agricultural land and soils, climate change adaption, the historic environment, landscape, and opportunities for recreation.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
252 York Potash	1057	Q168		<p>Supports an amalgamation of Option 1 and 2.</p> <p>The policy should take account of the statutory basis of reclamation of mineral sites to agriculture, forestry and amenity without the need to apply for subsequent planning permission. Aiming for high standards and improvement over the pre-development situation, particularly in respects of ecosystems is fully supported.</p> <p>Items that are, or should be, considered through the EIA process should be removed from the emerging policy.</p> <p>Reference to flooding in option 2 only related to minimising flooding in downstream locations. This should be both upstream and downstream to be found sound.</p> <p>Where enhancements of the enjoyment of heritage assets, increasing access opportunities, improvements to habitats and enhancing landscape are suggested these items should be subject to CIL. Presenting an excessive level of standards is contrary to the fundamental ethos of the NPPF (paragraph 173).</p>
128 Yorkshire Wildlife Trust	0773	Q168		<p>Support Option 2. The creation of BAP habitats and the improvement in connectivity of habitats are very important targets for the MWJP and should be included in the policy. There are a number of areas which could be prioritised in providing connected habitats. The Yorkshire and Humberside Biodiversity forum report 2009 shows how mineral site restoration can contribute to BAP creation.</p>
2841 Scarborough, Whitby and Ryedale Green Party	0246	Q168		<p>Preference for Option 2</p>
135 FCC Environment	0700	Q168		<p>Preference for Option 1</p>
1112 RSPB North	1752	Q168		<p>A combination of Options 1 and 2 would provide the best outcome, as support the more targeted approach outlined in Option 2. This response should be considered in the context of the response to questions 169 and 170.</p>
1577 Lafarge Tarmac	0995	Q168		<p>No clear preference for either option but they appear to reflect the Managing Landscape Change Report.</p>
116 Ryedale District Council	1202	Q168		<p>Supports Option 2.</p>
115 Minerals Products Association	1517	Q168		<p>No preference. The options do not reflect the Managing Landscape Change Report.</p>
3013	2061	Q168		<p>Preference for Option 2</p>



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
713 Kirkby Fleetham with Fencote Parish Council	1426	Q168		Both options should be combined.
2145 Petroleum Safety Services Ltd	0805	Q168		The options are not applicable to the current way oil and gas sites are reclaimed. The most common approach is that land is leased and upon reclamation is handed back to the landowner in a state equal to its former use. General criteria detailed in id67 are not applicable given that the developer does not own the land.
2197 CPRE (Harrogate)	1139	Q168		Preference for Options 1 and 2 Fully support the sustainable reclamation of sites, phased restoration is a preferred option.
120 English Heritage	0335	Q168		Favour Option 2 as it is likely to offer the greatest range of benefits.
250 Dart Energy (Europe) Ltd	0855	Q168		Supports the inclusion of both options.  Both options are appropriate for the plan. However, although the criteria in Option 2 provides clear focus for developers when designing their schemes, these should be expressed as a desire rather than an absolute.
121 Environment Agency	1302	Q168		Support Option 2 as this provides the best mechanism to secure long term ecological enhancements through reclamation schemes and will provide more policy backing for meeting the plan's objectives
121 Environment Agency	1301	Q169		One of the main concerns we have regarding quarry restoration is the risk that infilling quarry voids poses to the water environment. We would look for only inert materials to be used as quarry infill, but the ideal is if quarries are left unfilled. Therefore, Option 2 should also include a point on the protection of the water environment. We would like to highlight a potential issue for the reclamation of some minerals and waste sites, this is related to existing Environmental Permits for these sites. Waste sites, and some minerals sites, are likely to be permitted, and therefore it must be flagged that existing permits are adhered to/surrendered prior to the sites taking on a differing use. Waste sites may have to undertake monitoring after operations cease, and this has the potential to impact upon any proposed reclamation use. The EA therefore feel that a sentence should be added to this section stating the following: "Any permitted site should ensure that the requirements of its permit are met/abided by prior to the site being reused/reclaimed. It should also be noted that permitted sites may have long term monitoring requirements which could impact upon any intended future use."

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1174	2085	Q169		Concerned about unsuitability of wetland restorations. The NCA30: Southern Magnesian Limestone Interim Integrated Objectives document did not reflect the significance of the prehistoric landscape and showed Nosterfield as a blueprint for quarry restorations, which it should not have done and so should not be used as evidence in the development of the Joint Plan.
1112 RSPB North	1753	Q169		RSPB's response to the First Consultation in 2013 provides additional supporting information on this issue.
115 Minerals Products Association	1532	Q169		No
74 Selby District Council	1333	Q169		Encourage the need for sustainable alternative uses on appropriate sites sitting alongside the criteria developed for environmental restoration schemes.
1033 CTC North Yorkshire	2257	Q170		Would like assurances that where restoration is planned that every effort will be made to provide new route networks for non-motorised users suitable for either new local journeys or longer trails.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1754	Q170		<p>Strongly supports 'delivering enhancements for biodiversity and improvements to habitat networks, based on contributing towards established objectives' Mineral site restoration can make a major contribution to halting and reversing declines in biodiversity, this should be an overarching priority.</p> <p>Acknowledge the need for 'maximising the protection and enhancement of soils' in areas of best and most versatile land, but this should not lead to an automatic presumption in favour of restoration to agriculture in these areas. Surrey Minerals Plan provides appropriate wording for this</p> <p>'The MPA will not always expect agriculture to be the main after-use on BMV land, but will expect it to be restored to a condition and quality such that if required the land and soil would be in a state capable of supporting agriculture.'</p> <p>If soil protection is an aim then restoring and managing a site for nature conservation is often the most sustainable option from an environmental perspective.</p> <p>Support objective for 'providing additional flood storage capacity to help minimise flooding in down stream locations...particularly in proximity to the rivers Swale and Ure.' Where appropriate this should include provision for re-aligning flood defences to enable the rivers to be reconnected with their flood plains. Provision of flood storage capacity should be considered in the context of biodiversity-led restoration strategy, integrating the creation of wetland habitat into any flood storage proposals.</p> <p>Support Option 2's pragmatic approach to minerals development in airfield safeguarding zones. Well designed restoration schemes should enable the creation of wetland habitat which has a much lower risk of bird strike than large areas of open water.</p> <p>Support provision of increased opportunities for access and recreation. These can provide health benefits and enable people to access the natural environment in their local vicinity, these would need to be developed in a way which did not impact on the biodiversity potential of the site.</p>
713 Kirkby Fleetham with Fencote Parish Council	1427	Q170		<p>Reclamation requirements and objectives will vary from location to location, it is essential that local community wishes are given a high priority, so priorities will be very site specific.</p>
<b>Policy No:</b>		<b>id68</b>		
128 Yorkshire Wildlife Trust	0774	Q171		Supports Option 1 and 2.
116 Ryedale District Council	1203	Q171		Preference for Option 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2145 Petroleum Safety Services Ltd	0806	Q171		Not directly relevant to oil and gas exploration and appraisal given their temporary nature, more relevant for production phase. Reference to permeable surfacing not relevant to oil and gas as such sites are sealed with incorporated drainage system.
3013	2062	Q171		Preference for Option 1
94 Craven District Council	2350	Q171		Options 1 and 2 together are preferred.
74 Selby District Council	1334	Q171		Supports the promotion of resource efficiency.
250 Dart Energy (Europe) Ltd	0856	Q171		Support option 1. Both options should be implemented in the Plan.  In option 1 clear guidance should be provided on what a "climate change assessment" should include. However it is considered that for some forms of mineral development, such as CBM which is classified as low carbon, that a climate change assessment would not be appropriate.
231	2163	Q171		Preference for Option 2.
2197 CPRE (Harrogate)	1141	Q171		Preference for Options 1 and 2
1577 Lafarge Tarmac	0996	Q171		No clear preference for either option but would question what additional benefit a Climate Change Assessment would bring above the constituent parts of other policy criteria, leading to potential duplication.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1778	Q171		Support Options 1 and 2.  In particular 'reduction or minimisation of GHGs' and a requirement for proposals to be accompanied by a 'climate change assessment'.
252 York Potash	1058	Q171		Option 1 is supported. In assessing the carbon footprint the position of evidence boundaries will vary considerably. This policy is difficult to translate for operational development. For instance, how far upstream in the delivery chain (plant and equipment) is the carbon contribution measured and how far downstream in the product utility is the boundary set? These parameters will determine the acceptability of the policy and its workability.  In relation to climate change the NPPF appears to be ensuring that the development is resilient to climate change rather than requiring an assessment of the impact 'on' climate change.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2841 Scarborough, Whitby and Ryedale Green Party	0247	Q171		Preference for Options 1 and 2
115 Minerals Products Association	1518	Q171		No preference for either option. The proposed requirement of a Climate Change Assessment is impractical as its component parts will have already been considered in the individual requirements of the other policy criteria, or will have been considered in other disciplines, (especially the impact on the water environment and ecology) An assessment as suggested will duplicate what is contained elsewhere in an application.
115 Minerals Products Association	1530	Q172		No
766 Marton-cum-Grafton Parish Council	0574	Q172		Preference should only be given for EFW where CHP is an integral element of the scheme with agreed off take at the time of development.
213	1914	Q172		Sustainability should adhere to the Bruntland Criteria. This necessitates flexibility in design to allow future generations to meet their own needs.
115 Minerals Products Association	1531	Q173		No
1167 Hambleton Sustainable Development and Planning Policy	1234	Q173		Minimise carbon emissions, rainwater run-off and noise impacts of mineral extraction sites. Ensure sites are surrounded by significant tree planting as mitigation for these impacts.
2938	2362	Q173		Suggested improvement to the plan includes setting carbon emission reductions for waste processing/disposal and minerals extraction operations. The delivery of this policy will have a much wider impact than just in particular localities of Yorkshire. The way we treat waste and extract minerals contributes to the national and global state of the environment.
231	2214	Q173		BREEAM 'very good' should be the minimum required for any commercial-scale development of buildings, anything of a significant size should be excellent.
1167 Hambleton Sustainable Development and Planning Policy	1219	Q173		The Plan should include a target for a progressive reduction in carbon emissions from minerals extraction and waste disposal. Any development should prepare a carbon emissions reduction plan at the outset to ensure only the most efficient methods are used moving forward.
115 Minerals Products Association	1519	Q174		A threshold of 1,000 m2 will be appropriate.

**Policy No:**            id69

113	Howardian Hills AONB	1617	Q175	Preference for Option 1.
766	Marton-cum-Grafton Parish Council	0575	Q175	Preference for Option 1.
94	Craven District Council	2351	Q175	Option 2 preferred as allows flexibility.
3013		2063	Q175	Preference for Option 1
115	Minerals Products Association	1520	Q175	Favour flexibility and reliance on national policy so prefer Option 2
2145	Petroleum Safety Services Ltd	0807	Q175	Option 1 preferred.
2753	Friends of the Earth - Yorkshire & Humber and the North East	1779	Q175	Preference for Option 1.  Particularly the avoidance or mitigation of unacceptable adverse (including cumulative) effects upon land stability, air quality, soil resources and public safety.
119	Natural England	0934	Q175	Supports the inclusion of additional criteria which address impacts on tranquillity, dark skies, air quality, BMV Land, rights of way and recreation in option 1.
74	Selby District Council	1335	Q175	Support Option 1.  Operate satisfactorily in conjunction with other development management policies and national policy and would both protect and, where practicable, enhance local communities and the environment.
2840	Stubbs, Raine & Dennison ***consulted under 2240***	0173	Q175	Option 2 preferred. It is considered that guidance accompanying the NPPF together with existing and emerging local policies would provide sufficient controls without the need to introduce additional local requirements.
1111	The Coal Authority	0885	Q175	Prefer Option 1 but would support either option, with any policy including consideration of land stability as suggested.
213		1915	Q175	Preference for Option 1.
2841	Scarborough, Whitby and Ryedale Green Party	0248	Q175	Preference for Option 1

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

128	Yorkshire Wildlife Trust	0775	Q175	Supports Option 1.
2197	CPRE (Harrogate)	1142	Q175	Preference for Option 1
2253		2098	Q175	Preference for Option 1.  The criteria presented are very important, especially the inclusion of 'dark night skies' which is a particular quality of North Yorkshire.
1577	Lafarge Tarmac	0997	Q175	Preference for Option 2.  Flexibility and reliance on national policy.
135	FCC Environment	0701	Q175	Preference for Option 2
115	Minerals Products Association	1590	Q176	No
250	Dart Energy (Europe) Ltd	0857	Q177	The criteria in Option 1 overlaps with a number areas already discussed. The policy should either specifically exclude those previously discussed or include them all. There is potential for inconsistencies between policies as it stands.
115	Minerals Products Association	1591	Q177	No

**Policy No:**                      **id72**

1111	The Coal Authority	0888	Q185	In addition to national planning policy more definitive advice on coal mining risk assessments has been issued in the new National Planning Practice Guide. The Plan should contain some policy criteria on land instability arising from mining legacy in relation to mineral and waste development. There is a strong correlation between sites proposed for waste development and previously developed mining sites so it is a valid consideration to have local policy on this issue. It is also necessary of non-coal mineral extraction that takes place over historic coal workings to take due account of ground stability considerations.
3013		2066	Q185	Preference for Option 1
2197	CPRE (Harrogate)	1145	Q185	Preference for Options 2 and 3
2841	Scarborough, Whitby and Ryedale Green Party	0250	Q185	Preference for Option 1

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
74 Selby District Council	1336	Q186		The SDC LP and forthcoming Sites and Policies Plan will provide the development steer for the Selby District. The Core Strategy is open minded to development that requires a mine location.

**Section: 024: Protection of Important Assets**

**Chapter: 8**

**Policy No:**

113 Howardian Hills AONB	1611	8.26		The full title of the 1949 Act is 'The National Parks and Access to the Countryside Act.
113 Howardian Hills AONB	1610	8.31		The 'Major Development Test' is a confusing term to use as only used in the NYMNPA. Assumes the wording is taken from the National Park circular as AONBs do not work to the same definition. There has been a lot of correspondence between AONB committees and the Government on the issue of how major development is defined, simply because whether a proposal is considered major or not has a fundamental bearing on how it should be determined
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1462	8.39		The valued landscape in vicinity of AWRP has not been 'protected or enhanced'
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1463	8.45		There is no industrial precedent in the area of AWRP, other than the quarry which was completely hidden.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1298	8.51		<p>The chapter recognises that certain types of development require the use of water resources. Need to note that any private abstractions of surface or groundwater over 20m<sup>3</sup>/day are likely to require an abstraction licence from the EA. Developers should consult the relevant catchment Abstraction Management Strategy document to check whether water is likely to be available for abstraction in their area.</p> <p>Chapter 8 also acknowledges that minerals and waste developments can have an impact on the quality of the water environment. Would however like to see consideration of the aims and objectives of the Water Framework Directive referenced in this chapter, as this is now the key piece of EU legislation governing protection of the water environment. Under the WFD, developers should take all measures necessary to ensure that no deterioration of local surface water bodies is caused by a development, and that every effort is made to provide appropriate mitigation measures to achieve this. Further local information is available in the Humber River Basin Management Plan.</p>

**Policy No:** id61

115 Minerals Products Association	1508	Q149		<p>Favour Option 1 since the inclusion of descriptions of special qualities of designated areas is already implied by the national tests and in this respect the policy of NPPF should be paramount.</p> <p>Do not favour Option 2 or Option 3 and consider that a policy on views into and out of the designated areas could be used against industry by its opponents. For example both Sutton Bank and Kirkby Malzeard Moor can be seen in almost every part of the Vale of Mowbray and Vale of York and this probably affects the majority of aggregate sites promoted for the plan. If visibility of these designated areas from great distances is going to be taken into account in development management decisions then this raises concern. If the policy is to be workable it should be accompanied by clear guidelines to its interpretation that shows how much weight is to be given to long distance views.</p>
1111 The Coal Authority	0880	Q149		<p>Preference for Option 1.</p> <p>It is not considered necessary for the Joint Plan to seek to go beyond national policy. Minerals extraction can occur at a variety of scales and need not be incompatible with National Park or AONB status.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0318	Q149		<p>Support a strategy based upon Options 2 and 3. It is important that the Joint Plan ensures that the special qualities of these protected landscapes are not harmed through inappropriate mineral or waste development.</p> <p>Option 2 would enable the Plan to set out a policy framework specifically tailored to address the individual characteristics of these landscapes and set out the detailed factors that would need to be taken into account for any such proposals in these areas. Given the landscape character of these areas and, in particular, the views that they provide over large swathes of countryside lying outside their boundaries, it is essential that any minerals and waste developments outside the National Park and AONBs take full account of the effect that may have on the setting of these landscapes. This would also need to apply to the areas within the Joint Plan area which contribute to the setting of the of the Yorkshire Dales National Park.</p>
128 Yorkshire Wildlife Trust	0769	Q149		Supports Option 2 and 3.
2145 Petroleum Safety Services Ltd	0799	Q149		Option 1 is preferred.
713 Kirkby Fleetham with Fencote Parish Council	1419	Q149		Prefer Options 2 and 3
1577 Lafarge Tarmac	0986	Q149		<p>Preference for Option 1.</p> <p>The inclusion of descriptions of special qualities for designated areas is implied by NPPF, which should be paramount.</p> <p>Concerned regarding Option 3, i.e. views into and out of designated areas. If adopted this needs to have clear guidelines on interpretation and the weight to be attached to it.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
252 York Potash	1051	Q149		<p>None of these options are supported.</p> <p>Option 1 would simply affirm the requirements set out in the NPPF.</p> <p>Option 2 relies on a subjective and esoteric interpretation of the special quantities of the National Park. It is impossible for instance to measure tranquillity, the change in tranquillity and the significance of such change.</p> <p>Option 3, if this were taken forward the 'setting' of the two National Parks would need to be set out in a spatial context.</p> <p>Whichever option, or combination of options, that is taken forward at the next stage should retain and reinforce the approach set out in Core Policy E of the Core Strategy and Development Policies (2008). This would provide an appropriate and balanced approach for considering such proposals, which is consistent with national policy.</p>
1157 W Clifford Watts & Co Ltd	0624	Q149		Prefer Option 1 as would most closely reflect advice given in the NPPF in terms of assessing development in National Parks.
3013	2055	Q149		Preference for Option 3
1140 Sibelco	1704	Q149		It is impossible to support the options proposed as not aware of any definition of 'Major Development Test'. Without specific information on the proposed test criteria such proposals are unsustainable. Subsequent text in the plan recognises that a large part of the plan area is designated and as such the options would appear to preclude minerals development.
113 Howardian Hills AONB	1614	Q149		<p>Support Option 2 plus Option 3 subject to the following comments</p> <ul style="list-style-type: none"> <li>- the wording 'Major Development Test only commonly used in the National Park</li> <li>- Excluding Option 3 should not be allowed, as impacts of development within the setting can be as or even more significant than the impacts of development within the designated boundary itself.</li> </ul> <p>The wording of a policy in relation to the National Park(s) and AONBs should relate to development both within the boundary and within the setting.</p>
116 Ryedale District Council	1195	Q149		The use of a policy approach which uses the Major Development Test together with 'special qualities' is supported, providing that the policy does not seek to amend or expand the principles of the Major Development Test away from national policy. Options 2 and 3 are supported.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

250	Dart Energy (Europe) Ltd	0849	Q149	Option 3 is not acceptable as this appears to extend the boundaries of the National Park and AONBs. The integrity of these boundaries should be maintained and respected. NPPF Paragraph 115 clearly states "in" not "in and around" there is no national level support for what appears to be an attempt to extend the effective boundaries of the National Parks and AONBs.
1355		2189	Q149	Preference for Option 1
94	Craven District Council	2345	Q149	Option 2 and 3 seem appropriate. Recognises that views out of National Parks are important to their scenic beauty.
2197	CPRE (Harrogate)	1132	Q149	Preference for Option 3
119	Natural England	1036	Q149	Supports Option 2 and Option 3.
2841	Scarborough, Whitby and Ryedale Green Party	0241	Q149	Preference for Option 2
3003		2126	Q150	One of the key principles of the creation of the National Park was to 'seek to foster the economic and social wellbeing of the local community'. This consultation seems to be significantly bias towards the other National Parks aims regarding environmental issues. The economic development of the local communities within the Park is an essential ingredient to their social wellbeing and an attempt to stifle any development will hinder this fragile wellbeing.
120	English Heritage	0319	Q150	The policy which considers the impact of minerals and waste developments upon the setting of landscapes should also include reference to the Forest of Bowland AONB on the western edge of the Plan area.

**Policy No:**                      id62

128	Yorkshire Wildlife Trust	0770		Mineral extraction sites restored for biodiversity can have much greater value for wildlife than arable farmland. The Trust would not object to mineral extraction in the green belt if restoration plans provide certainty that the site would be restored to bio diverse habitats and management would be in perpetuity or very long term.
250	Dart Energy (Europe) Ltd	0850	Q151	The acknowledgement in Option 1, that 'The NPPF defines minerals extraction as not inappropriate in the green belt' is welcomed, and should be retained in future policies.
2809		0061	Q151	Option 1 is the most appropriate option if there is to be mineral extraction in the green belt.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
362 Harrogate Friends of the Earth	1381	Q151		None.
135 FCC Environment	0697	Q151		Preference for Option 1
2197 CPRE (Harrogate)	1133	Q151		Preference for Option 3
2982 Friends of the Earth	1347	Q151		None of the Options
213	1912	Q151		Preference for Option 1.
2180 Peel Environmental Limited	0270	Q151		Option 2 is supported as this provides some flexibility towards the location of waste facilities in the Green Belt.  Option 1 relies upon the approach set out in draft national waste planning policy. It is not considered appropriate at this stage to use this approach until it is published in final format.  The Plan must recognise that certain types of waste management facility (composting and AD) are in fact more suited to rural locations and so it may be necessary for these to come forward within the Green Belt.
120 English Heritage	0320	Q151		Favour Option 1, which follows national Green Belt Policy under the provision of the NPPF. - Minerals extraction is not inappropriate development provided it does not conflict with the purposes of including land in the Green Belt. In the case of York Green Belt the principal consideration would be whether or not development would be likely to harm those elements which contribute to the special character or setting of the historic City. - Waste developments are inappropriate development. - Given the character of the Joint Plan area (especially in York, the need to ensure that its special historic character and setting are not harmed). There is no reason why the approach set out in the NPPF should be relaxed. If a waste development is proposed at an existing waste management facility in the Green Belt (as in Option 3) it would fail under the last bullet point of the NPPF, Paragraph 89.
1355	2190	Q151		Preference for Option 1
1577 Lafarge Tarmac	0987	Q151		Preference for Option 1.  Supports mineral development in the Greenbelt.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
766 Marton-cum-Grafton Parish Council	0569	Q151		Preference for Option 1 for both minerals and waste.
116 Ryedale District Council	1196	Q151		Preference for Option 1 and 3.
713 Kirkby Fleetham with Fencote Parish Council	1420	Q151		Option 1 for minerals and Option 3 for waste
115 Minerals Products Association	1509	Q151		Favour Option 1
2145 Petroleum Safety Services Ltd	0800	Q151		Option 1 is preferred.
1111 The Coal Authority	0881	Q151		The NPPF provides sufficient guidance on minerals development in the green belt and there is no requirement for any additional local policy
3013	2056	Q151		Preference for Option 1
2982 Friends of the Earth	1348	Q152		<p>Many residents in the Plan area live in towns where Green Belt areas are crucial to their quality of life, flood defences, preservation of character of towns/villages. Hard to see how minerals and waste development can be sustainably added to this, especially with an increase in transport.</p> <p>All new minerals and waste development in the Green Belt to constitute 'inappropriate development' that may be harmful to the Green Belt and, as such, only be approved in very special circumstances. Disagree with the NPPF that certain forms of mineral extraction may not be inappropriate whereas elements of many renewable energy projects may be.</p>
2992 Friends of the Earth	1640	Q152		<p>The majority of North Yorkshire's people live in towns where green belt areas are crucial to their quality of life, flood defences, preservation of character of towns/villages. It is difficult to envisage how minerals/waste activities can be 'sustainably' added into the mix, especially where an increase in heavy traffic is involved.</p> <p>All mineral and waste development in the green belt constitutes 'inappropriate development' and should only be approved in very special circumstances. We disagree with the NPPF that certain forms of mineral extraction many not be inappropriate whereas elements of many renewable energy projects many be inappropriate.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
362 Harrogate Friends of the Earth	1382	Q152		The majority of North Yorkshire's People live in towns where green belt areas are crucial to their quality of life, flood defences, preservation of character of towns/ villages. It is difficult to envisage how minerals/waste activities can be 'sustainably' added into the mix, especially where an increase in heavy traffic is involved. All mineral and waste development in the green belt constitutes 'inappropriate development' and should only be approved in very special circumstances. We disagree with the NPPF that certain forms of mineral extraction many not be inappropriate whereas elements of many renewable energy projects many be inappropriate.
1577 Lafarge Tarmac	0988	Q153		Rely upon national policy and no further local policy is considered justified.
74 Selby District Council	1330	Q153		Advocates a policy specifically dealing with minerals and waste developments in the Green Belt. Base upon emerging national policy but also reflect local circumstances. Could support development in the Green Belt if the development requires such a location.
2992 Friends of the Earth	1641	Q153		The Authorities should articulate a formidable set of criteria to protect the integrity of its Green Belt areas.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1570	Q153		The NPPF presumption is that 'inappropriate development' in the green belt will be refused planning permission. This negative presumption needs to be placed at the heart of any policy relating to green belt rather than the positive presumption presented in the 3 options in the consultation document. Whilst mineral extraction can be defined as 'not inappropriate' in the green belt, it is not the case that these developments are automatically acceptable. Any policy on green belt should include a consideration of openness as well as the purpose of the green belt. The policy should make it clear that 'mineral extraction' may be 'not inappropriate', recycling processing or storage may be inappropriate. All waste development would be inappropriate and applications would need to demonstrate the Very Special Circumstances to out weigh the harm resulting from the proposal.
115 Minerals Products Association	1510	Q153		The plan should rely on national policy and no further development of local policy is justified.
2982 Friends of the Earth	1349	Q153		There should be a strong set of criteria to protect the integrity of the green belt areas.
362 Harrogate Friends of the Earth	1383	Q153		The Authorities should articulate a formidable set of criteria to protect the integrity of its Green Belt areas.
362 Harrogate Friends of the Earth	1384	Q154		The criteria set out nationally should represent a bare minimum and that additional local criteria should be added.

**Policy No:**              id63

1174		2078	Q155	No preference.
2197	CPRE (Harrogate)	1134	Q155	Preference for Option 1
2840	Stubbs, Raine & Dennison ***consulted under 2240***	0167	Q155	Prefer Option 2 as it would provide the necessary flexibility for applicants to bring forward proposals without the obligation to consider additional local criteria over and above existing national constraints.
94	Craven District Council	2346	Q155	Option 2 is appropriate as this would not result in a duplication of policy.
135	FCC Environment	0698	Q155	Preference for Option 2
119	Natural England	0930	Q155	Supports Option 1
2779	Pickering Civic Society	0051	Q155	Preference for Option1
115	Minerals Products Association	1511	Q155	There is not a lot of difference between the two options. Favour flexibility and reliance on national policy so favour Option 2. Local Plans including landscape policies is a red herring as an applicant would have to take into account all development plan policies whatever option was chosen and would expect these to progressively reflect the NPPF as existing local plans are replaced/reviewed and brought up to date.
1577	Lafarge Tarmac	0989	Q155	Preference for Option 2.  Support flexibility and reliance on national policy, although little difference between the two options. The reference to Local Plan Landscape policies is seemingly misleading as it would be expected that all landscape policies reflect the NPPF.
2145	Petroleum Safety Services Ltd	0801	Q155	Option 1 but include reference to short term landscape impact.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0321	Q155		<p>Support Option 1.</p> <ul style="list-style-type: none"> <li>- it is important that the Plan ensures that the qualities of its landscapes are not harmed through inappropriate mineral or waste developments.</li> <li>- Option 1 would enable a policy framework tailored to address the individual characteristics of landscapes and set out the detailed factors that would need to be taken into account for any proposals in these areas.</li> <li>- In the NPPF there is an expectation that, with a compliant plan in place, there will be no need for those using it to have to look again at the NPPF in making decisions on development proposals. If the Plan were to contain no policy for landscapes in the Joint Plan area then reference would have to be made back to the NPPF.</li> </ul>
2809	0062	Q155		<p>Agree with Option 1 as policy should be developed locally rather than imposed from central government.</p>
252 York Potash	1052	Q155		<p>The whole of the landscape has been influenced by human activity at some time at differing scales. Mineral activities are temporary and can only take place where the minerals occur.</p> <p>The Managing Landscape Change report predates the NPPF and must be reviewed in the context of the 'golden thread' of the presumption in favour of sustainable development.</p> <p>Its key recommendations identify that a long-term vision "included the need to consider mineral development as part of a continuum of landscape change, not only within the timescale of an individual development Plan or planning application, but over much longer period of time, in order to recognise and fit in with other environmental, climatic and land use changes that are likely to occur".</p> <p>If no changes are deemed to be acceptable then no development will occur.</p> <p>The Major Development Test already requires the assessment of major developments to include consideration of any detrimental impact on the landscape and the extent to which that could be moderated.</p> <p>Whichever option is taken forward clearly needs to have sufficient regard for the Major Development Test and other policies in the NPPF.</p>
1111 The Coal Authority	0882	Q155		<p>Local landscape designations should not be utilised to try and resist appropriate and necessary mineral extraction.</p> <p>Option 2 should be pursued as national planning policy in the NPPF sets out sufficient policy framework.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
213	1913	Q155		Preference for Option 1. Development of waste treatment facilities should not be permitted where landscape impacts cannot be mitigated.
250 Dart Energy (Europe) Ltd	0851	Q155		Support Option 1. It is not considered necessary to include a specific policy in relation to landscape, when sufficient protection is provided for non-statutory designations in the NPPF. Inclusion of such a policy may lead to inconsistencies with national policy
116 Ryedale District Council	1197	Q155		Local Plan policies relating to landscape are locally specific and detailed. It is considered that the approach in the MWJP should use these in conjunction with national policy. The MWJP should recognise that some settlements are split by the National Park boundary and there are landscape sensitivities associated with those parts of the settlement adjacent to but not within the National Park.
766 Marton-cum-Grafton Parish Council	0573	Q155		Preference for Option 1. Where landscape impacts cannot be mitigated development should not be permitted. AWRP was concluded to have adverse impacts on landscape.
1355	2191	Q155		Preference for Option 1
3013	2057	Q155		Preference for Option 1
713 Kirkby Fleetham with Fencote Parish Council	1421	Q155		Option 1 preferred as permits local policies to be developed and applied.
1174	2079	Q156		The MLC acknowledges the fact that landscape evolve over time and quarrying proposals which may impact on the landscape need to take a view of the wider landscape of the area and long term afteruse of the site. The only sustainable option is to protect what makes the landscape special now, an open agricultural and historic landscape. There is no long term funding for restoration. Concerned about potential loss of the lands agricultural and landscape value. Needs to reference the North Yorkshire and York Landscape Characterisation Project.
713 Kirkby Fleetham with Fencote Parish Council	1422	Q156		One topic of landscape which should be considered is the physical element. Where aggregate working occurs key features are removed. It is essential that due consideration is given to the preservation of important examples of these features.
<b>Policy No:</b>		<b>id64</b>		
2938	2366			Destruction of wildlife habitats cannot be reversed with biodiversity offsetting and should not be endorsed in the policy as a valid justification for doing so. Planting a few trees in a different spot can never make up for the loss of ancient woodland.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1167 Hambleton Sustainable Development and Planning Policy	1233			Opposes the principle of 'biodiversity offsetting' as a justification for destroying existing habitats. Most habitats cannot be substituted due to ecological, historical and social value e.g. ancient woodland, SSSIs. Some designations are irreplaceable and thus should not be classed as available for mineral development.
2841 Scarborough, Whitby and Ryedale Green Party	0242	Q157		Preference for Options 2 and 3
250 Dart Energy (Europe) Ltd	0852	Q157		Option 1 is supported. It is not necessary to include a specific policy in relation to biodiversity and geodiversity, when adequate guidance is already provided by the NPPF.
113 Howardian Hills AONB	1615	Q157		Preference for Option 2 plus Option 3
713 Kirkby Fleetham with Fencote Parish Council	1423	Q157		Options 2 and 3 provide the best protection. Losses should be offset locally.
2992 Friends of the Earth	1642	Q157		Elements from Option 1,2,and 3 may be acceptable if combined. The Criteria set out in the NPPF should provide the bare minimum with additional local criteria added. Option 2 would seem to support proposals which demonstrate that unacceptable impacts on biodiversity and geodiversity would not arise having regard to certain local aspects. Option 3 would ensure that there are no overall losses to biodiversity in the local area although it is difficult to see how, in practice, you can simply 'offset' biodiversity to a different location as each area has its own unique local conditions.
2982 Friends of the Earth	1350	Q157		Elements from Options 1,2 and 3 may prove acceptable if combined. The criteria in the NPPF should represent a bare minimum and additional local criteria should be added. Option 2 appear to support proposals which demonstrate that unacceptable impacts on biodiversity and geodiversity would not arise having regard to certain local aspects. Option 3 would ensure there are no overall losses to biodiversity in the local area although it is difficult to see how, in practice, biodiversity can be offset to a different location.
118 East Riding of Yorkshire Council	1691	Q157		Prefer Option 2, a specific policy is required in the local plan, Option 3 also has some merit.
94 Craven District Council	2347	Q157		Option 1 preferred as would help ensure policy is not duplicated.
1111 The Coal Authority	0883	Q157		Local policy should not be utilised to try and resist appropriate and necessary mineral extraction. Option 1 should be pursued as national planning policy in the NPPF sets out a sufficient policy framework.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
231	2161	Q157		Preference for Option 2 plus 3.The NPPF does not provide sufficient protection for biodiversity. The creation of new biodiverse habitats as part of developments should be encouraged. Sceptical about the value of biodiversity offsetting. It should not be possible to use creation of new habitats as a justification for destroying established ones.
2145 Petroleum Safety Services Ltd	0802	Q157		Preference for Option 2.
1577 Lafarge Tarmac	0990	Q157		Preference for Option 1.  Provides most flexibility although seemingly little difference between Options 1 and 2. Options 3 and 4 should be discounted because it is premature to include biodiversity offsetting, as it is unclear how this would operate.
119 Natural England	0931	Q157		Prefers Option 2 and 3.
362 Harrogate Friends of the Earth	1385	Q157		Elements from Option 1,2,and 3 may be acceptable if combined. The Criteria set out in the NPPF should provide the bare minimum with additional local criteria added. Option 2 would seem to support proposals which demonstrate that unacceptable impacts on biodiversity and geodiversity would not arise having regard to certain local aspects. Option 3 would ensure that there are no overall losses to biodiversity in the local area although it is difficult to see how, in practice, you can simply 'offset' biodiversity to a different location as each area has its own unique local conditions.
2197 CPRE (Harrogate)	1135	Q157		Preference for Option 3 and 4
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0168	Q157		Option 2 is preferred. Almost all operators accept the need to conserve and enhance biodiversity and geodiversity and most work with the Wildlife Trusts and other local conservation bodies to achieve this. This voluntary approach is backed up by the EIA Regulations which apply to almost all mineral related applications and which result in a high degree of protection of both sites and species.
116 Ryedale District Council	1198	Q157		Preference for Option 2 and 3.
128 Yorkshire Wildlife Trust	0771	Q157		Supports Options 2 and 3. It is important to have an appropriate local plan for restoration rather than relying on national policy. Mineral site restoration need to be linked to biodiversity opportunity mapping so that site restoration can contribute most effectively to linking up habitats. Some suggested habitats have been put forward with this response.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3013	2058	Q157		Preference for Option 2
1112 RSPB North	1746	Q157		<p>Support Option 2, this will apply the biodiversity related requirements of the NPPF through the delivery of local biodiversity targets and objectives. Especially support the mineral related objectives of the North Yorkshire and York LNP Draft Strategy and these should be reflected in the Plan. Option 2 also provides a level of protection of habitats and species outside of designated sites, reflecting their importance as key components of ecological networks.</p> <p>Concerns about Options 3 and 4 in their current form. International and national statutory protected sites for conservation (SPAs, SACs, RAMSAR, SSSIs) should be excluded from biodiversity offsetting schemes as development which would damage these sites should not normally be permitted. The Plan should also make it clear that long term management and monitoring would be required for any offsetting schemes to ensure the delivery of anticipated biodiversity benefits.</p> <p>Option 4 least preferred Option as allowing biodiversity offsetting schemes to be undertaken outside the Plan area could easily result in net losses to biodiversity in the area.</p>
252 York Potash	1053	Q157		Option 1 is supported. Where residual impacts occur following the implementation of mitigation measures the balance as to whether the proposal is acceptable, with other enhancements, is the decision that has to be made by planning authorities in accordance with relevant planning policies including, where appropriate, the Major Development Test set out in the NPPF.
1174	2080	Q157		No preference. Agriculture creates biodiversity. Biodiversity gain is used as an excuse to destroy open agricultural land leaving lakes surrounded by inappropriate screening.
1541	2276	Q157		<p>Preference for Options 2 and 3.</p> <p>However, the Plan must reject the principle of 'biodiversity offsetting' as any justification for destroying existing habitats.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1297	Q157		<p>Option 2 is the most positive, in that consideration is given to non-statutory designated sites and species. The Option is not ideal as although enhancements are mooted, a method of securing these through permissions is not. Must consider how applicants will be required to contribute towards meeting BAP objectives, and what level of contribution is acceptable. Some minerals works are large scale, it is essential to ensure significant contributions are made towards meeting BAP objectives and ecological enhancement commensurate with the size of the works.</p> <p>Furthermore, whilst biodiversity offsetting should not be employed as a way to usurp the mitigation hierarchy as set out in the NPPF (para118), it may provide a vehicle to deliver ecological mitigation during the operational phase of minerals and waste projects. This should not be considered mitigation for whole project impacts, merely as one tool to expedite the ecological enhancements required by national and local policy. Where developments may lead to temporary habitat loss, provision of compensatory habitat as part of a restoration scheme many years into the future is not appropriate. It would be better to secure some local off-site enhancements during the construction and operational phases through mechanisms such as local biodiversity offsetting, which could be tied directly to BAP priorities.</p>
115 Minerals Products Association	1512	Q157		<p>Little difference between Option 1 and Option 2, but initially favour Option 1 as is most flexible. It is too early to favour biodiversity offsetting since we do not know how it would operate yet so options 3 and 4 should be discounted at this time.</p>
2992 Friends of the Earth	1643	Q158		<p>The Authorities should do everything they can to protect local biodiversity. Where there would be an overall loss in biodiversity from a particular development, then it should not be permitted. The Plan should make it clear that this is the case.</p>
2937	1927	Q158		<p>The plan should not support the principle of biodiversity offsetting as a justification for destroying existing habitats.</p>
362 Harrogate Friends of the Earth	1386	Q158		<p>The Authorities should do everything they can to protect local biodiversity. Where there would be an overall loss in biodiversity from a particular development, then it should not be permitted. The Plan should make it clear that this is the case.</p>
2982 Friends of the Earth	1351	Q158		<p>The Plan should protect local biodiversity, minerals extraction will adversely impact biodiversity. Where there would be overall biodiversity losses from a particular development then that development should not be permitted.</p>
2965	0644	Q158		<p>The Plan should not support the principle of biodiversity offsetting as a justification for destroying existing habitats.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1112 RSPB North	1747	Q158		Minerals industry has the potential to help halt and reverse biodiversity loss. E.g. mineral site restoration has the potential to deliver habitat creation targets, but to do this there needs to be a step change in the approach to mineral site restoration shifting the emphasis from piecemeal conservation action towards a more integrated landscape approach.
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0169	Q159		It is considered that mandatory biodiversity offsetting to compensate for losses is very seldom either necessary or practicable and in our experience gains in biodiversity or geodiversity can almost always be designed into the proposals.
362 Harrogate Friends of the Earth	1387	Q159		The Authorities should do everything they can to protect local biodiversity. Where there would be an overall loss in biodiversity from a particular development, then it should not be permitted. The Plan should make it clear that this is the case.
1174	2081	Q159		Where minerals underlie agricultural land the policy must be to restore land to its pre-existing land form for food production and biodiversity gains.
1112 RSPB North	1748	Q159		Encourage the Plan to promote a biodiversity -led restoration strategy which should address the following points. <ul style="list-style-type: none"> <li>- treat biodiversity as the primary consideration in the restoration of mineral sites</li> <li>- give preference to allocating and/or permitting mineral development in areas where it will have the greatest potential to maximise biodiversity.</li> <li>- create priority habitat at a landscape scale, either on individual sites or on clusters of sites in close proximity.</li> <li>- avoid habitat packing (i.e. cramming lots of different habitats or afteruses into a site.)</li> <li>- deliver targets and objectives of relevant Biodiversity Action Plans and Local Nature Partnerships</li> <li>- integrate habitat creation on restored mineral sites into the existing ecological network in the surrounding area</li> <li>- set ambitious, but deliverable, targets for the area of priority habitat that will be created on allocated sites (assuming sites are allocated in later stages of the Plan.)</li> </ul>
2992 Friends of the Earth	1644	Q159		The Authorities should do everything they can to protect local biodiversity. Where there would be an overall loss in biodiversity from a particular development, then it should not be permitted. The Plan should make it clear that this is the case.
2966 Green Party	1561	Q159		Oppose the principle of biodiversity offsetting as justification for destroying existing habitats.

**Policy No:**                      id65

2197	CPRE (Harrogate)	1136	Q160	Preference for Option 1, 2 or 3
94	Craven District Council	2348	Q160	Option 1 preferred as does not duplicate policy.
2145	Petroleum Safety Services Ltd	0803	Q160	Preference for Option 1.
250	Dart Energy (Europe) Ltd	0853	Q160	Support option 1. It is not necessary to include a specific policy in relation to the historic environment, when adequate guidance is already provided by the NPPF and in all specific policies.
115	Minerals Products Association	1513	Q160	Little difference between Option 1 and 2, but initially favour option 1 as most flexible. Option 2 is covered under the 'public benefits' mentioned in NPPF and Option 1. Whilst it remains uncertain what mineral extraction proposals will be advanced in the City of York area, if Option 3 is adopted the plan should explain how developments in rural areas can affect the setting of the historic core of a large city.
116	Ryedale District Council	1199	Q160	Support a policy approach whereby heritage assets will be conserved in line with the NPPF but with the additional encouragement of proposals delivering enhancements to the Setting and / or Securing improved access to the asset and understanding of the assets for the longer term. It is considered appropriate that the option regarding setting be expanded to include the historic setting of those historic settlements within the Plan area. The issue of setting should not be specific to the City of York alone. Supports option 2 and 3.
2787		0006	Q160	Preference for Option 2.  Because it focuses on the local impact.
2786		0002	Q160	Option 2.  Because it strengthens with local concerns any stance against negative impacts of development
113	Howardian Hills AONB	1616	Q160	Preference for Option 2.
3013		2059	Q160	Preference for Option 2



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1174	2082	Q160		Prefer Option 1, which is to rely on national policy. Option 2 depends too much of different interpretations of what constitutes enhancement of the setting of assets and what constitutes a better understanding. The MLC based its evidence on false premises about Thornborough and so cannot rely on local policy and evidence.
118 East Riding of Yorkshire Council	1692	Q160		Prefer Option 2 and 3
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0170	Q160		Option 1 is preferred. Existing national and existing and emerging local policies presently afford a high degree of protection for heritage assets adding significantly to the predetermination costs. It is therefore considered that no more stringent criteria are required and that expenditure associated with the identification and the protection of heritage assets already add significantly to the cost of mineral development.
2841 Scarborough, Whitby and Ryedale Green Party	0243	Q160		Preference for Options 2 and 3
1577 Lafarge Tarmac	0991	Q160		Preference for Option 1.  Provides flexibility although seemingly little difference between Options 1 and 2. In terms of Option 3 the Plan should clarify how mineral developments can affect the setting of the historic core of a large city.
713 Kirkby Fleetham with Fencote Parish Council	1424	Q160		Prefer Options 2 and 3
1111 The Coal Authority	0884	Q160		Local policy should not be utilised to try and resist appropriate and necessary mineral extraction. Option 1 should be pursued as national planning policy in the NPPF sets out a sufficient policy framework.

120 English Heritage

0322

Q160

Support an approach which combines Option 2 and Option 3

- The NPPF Paragraph 126 requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. Given the extent and importance of the heritage assets in the Joint Plan area the Plan should include a robust framework for the management of this resource in line with the requirements of the NPPF
- In the NPPF there is an expectation that, with a compliant plan in place, there will be no need for those using it to have to look again at the NPPF. If the Plan did not contain a policy for the historic environment ( as Option 1 proposes) then, in determining many proposals affecting the areas historic environment reference will still need to be made to the NPPF.
- It is not considered appropriate for the Joint Plan to simply rely on the historic environment policies in the various Local Plans across this part of North Yorkshire. There is no guarantee that all of the Local Planning Authorities will have adopted Local Plans by the time the Joint Plan is adopted it is important that the Joint Plan sets out its own framework to ensure that the historic environment is appropriately conserved in line with the requirements of the NPPF.
- Given the international importance of York and the primary purpose of its green belt it is also essential that the Joint Plan includes a framework which is specifically designed to protect those elements which contribute to the special historic character and setting of the City.
- In order to comply with the requirements of the NPPF the Joint Plan will need to set out a policy framework for the historic environment which will
  - 1) provide certainty about how applications on planning proposals affecting the Joint Plan area's heritage assets will be determined
  - 2) how the presumption in favour of sustainable development insofar as it affects the historic environment will be applied locally
  - 3) provide clear policies on what will or will not be permitted or provide a clear indication of how a decision maker should react to a proposal likely to affect a heritage asset.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
252 York Potash	1054	Q160		<p>A combination of Option 1 and Option 3 is supported on the basis that the 'setting' of the City of York can be clearly defined and justified. An arbitrary judgement on the setting of other heritage assets is an esoteric subjective opinion that cannot be defined. It will not be possible to define 'enhancements' in any meaningful way that will reduce uncertainty and minimise risk of challenge.</p> <p>For option 2 to be successful it would have to define how to 'enhance' a setting and if this is necessary it would have to be done on an individual proposal basis. This is another example of the Plan 'gold-plating' of the NPPF which dilutes it and presents a barrier to development.</p>
1174	2083	Q161		Rely on national policy backed by up to date robust evidence taken for all relevant sources. Do not use predictive landscape modelling as recommended by the MLC study.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1571	Q161		The MWJP should include a robust policy with regards the need to protect and enhance the historic environment. The policy should make it clear that this protection applies not only to the built environment but also historic landscape. It should make it clear that all heritage assets are protected, including listed buildings and conservation areas, Historic Battlefields, Historic Parks and Gardens and the Special Landscape Areas defined by all Local Authorities.
713 Kirkby Fleetham with Fencote Parish Council	1425	Q162		The archaeology of the whole Plan area should be preserved, not just in York.
1174	2117	Q162		Take a holistic approach

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0333	Q162		<p>- The NPPF provides little guidance on the approach which should be taken to applications affecting non-designated archaeological remains. To deal with this the Joint Plan needs to set out an approach which the Councils will adopt when considering such proposals.</p> <p>- Two areas may require specific guidance as they both contain a large number of nationally important archaeological sites most of which are undesignated</p> <p>1) Archaeological landscapes of the Vale of Pickering are of international importance. The area exhibits evidence of continuing human habitation and early prehistoric periods, through the Roman period up to the present day. Of particular concern is how extraction might affect the hydrology of this area and the preservation of any waterlogged archaeological remains.</p> <p>2) Archaeological landscapes of the Yorkshire Wolds are of national significance. The landscape has an exceptional concentration of archaeological features from different ages.</p> <p>- There are some extensive designated heritage assets where views from and into the areas are so important the Joint Plan might consider providing specific policy guidance. These include</p> <p>1) Fountains Abbey/Studley Royal World Heritage site. In Order that Outstanding Universal Value of this area is protected in line with national policy, the Plan should set out the approach which will be taken to development proposals within the boundaries of the site, its buffer zone and its wider setting.</p> <p>2) In the case of most Registered Battlefields there is often little evidence of the battle itself. The battle is appreciated through interpretation of the remaining elements of the landscape and, in some instances, through archaeological finds, although it is often more about a sense of place than physical remains. More detailed policy may be needed to take account of Registered battlefields when determining proposals.</p>
115 Minerals Products Association	1533	Q162		No
1174	2084	Q163		Yes, the prehistoric landscape of the A1 corridor as shown in the EH document Prehistoric Monuments of the A1 corridor.
74 Selby District Council	1331	Q163		All statutory and non-statutory protected sites should be given due regard through a sequential approach and considered on its own merits. Although it is an important factor, York should not be absolved from its responsibilities because it is a historic city.
115 Minerals Products Association	1534	Q163		No

**Policy No:**              id66

250	Dart Energy (Europe) Ltd	0854	Q164	Mineral development has the potential to affect and be effected by, the water environment. The inclusion of a specific policy is appropriate, provided that the wording of the policy is both specific to minerals developments and consistent with policies within the NPPF and other development Plans in the area.
2779	Pickering Civic Society	0052	Q164	Preference for Option 2
2991	Envireau Water	1554	Q164	Preference for Option 1.
2180	Peel Environmental Limited	0271	Q164	Supports Option 2.  This provides more clarity than just relying upon paragraphs 94 and 109 of the NPPF.
362	Harrogate Friends of the Earth	1388	Q164	Neither option as drafted are supported. The NPPF should represent a bare minimum and that additional local criteria should be added. Option 1 should clearly define 'unacceptable'. Option 2 appears to provide a basis for a more robust resistance to developments that will put water quality and volumes at risk and should be included in addition to the minimum criteria of the NPPF. The criteria should take account of particular issues that may be applicable locally such as projected flood risk for the next decades, which water tables are at risks etc.
2197	CPRE (Harrogate)	1137	Q164	Preference for Option 2
1112	RSPB North	1749	Q164	Support Option 2 as it emphasises the potential long term benefits that minerals development, in particular, can provide for the water environment, e.g. by providing increased flood alleviation and by naturalising river channels and re-connecting them with the floodplain, whilst ensuring that adverse impacts on ground or surface waters are avoided.  Large areas within the Plan area are available for shale gas extraction. Concerned about the impact fracking may have on the groundwater and environment. This type of development should be excluded from statutory designated sites due to the large demand it places on water environment and uncertainties regarding potential adverse impacts.
94	Craven District Council	2349	Q164	Option 1 preferred

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2753 Friends of the Earth - Yorkshire & Humber and the North East	1777	Q164		Preference for Option 2.  Clearly acknowledge the precautionary principle which is the basis for the Water Framework Directive. Sensitive areas, including aquifers and protection zones should be included in the Minerals Spatial Map.
231	2162	Q164		Preference for Option 2. Need to better protect surface and groundwater.
2992 Friends of the Earth	1645	Q164		Neither option as drafted are supported. The NPPF should represent a bare minimum and additional local criteria should be added. Option 1 should clearly define 'unacceptable'. Option 2 appears to provide a basis for a more robust resistance to developments that will put water quality and volumes at risk and should be included in addition to the minimum criteria of the NPPF. The criteria should take account of particular issues that may be applicable locally such as projected flood risks for the next decades, which water tables are at risk etc.
2841 Scarborough, Whitby and Ryedale Green Party	0244	Q164		Preference for Option 2
2840 Stubbs, Raine & Dennison ***consulted under 2240***	0171	Q164		Option 1 preferred. With certain limited exceptions protection of the water environment is the responsibility of the Environment Agency and various internal drainage boards. These are statutory consultees in the planning process, it is therefore considered that, beyond the general strategic approach set out in the NPPF, the Minerals and Waste Joint Plan should avoid any possibility of duplication of regulatory controls.
116 Ryedale District Council	1200	Q164		Preference for Option 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
121 Environment Agency	1299	Q164		<p>Strongly support Option 2.</p> <p>A specific policy regarding the Water Environment would give greater weight to water protection, flood risk mitigation, and water resources. As highlighted in the plan, waste and mineral sites have the potential to impact greatly on the water environment, and we therefore feel a specific policy on the issue would allow a greater degree of control on the issue. The Water Framework Directive has set targets for water bodies to achieve 'good' status by 2015, and by having a specific/detailed 'Water Environment' policy you would have greater potential to help achieve this status for water bodies within the plan area, rather than relying on broad arching national policy. Also, funding for flood defences/alleviation schemes has recently changed and there is now a greater emphasis on developer contributions helping to deliver flooding infrastructure. By having a specific Water Environment policy it would create potential for flood alleviation to be provided as part of site reclamation.</p> <p>We suggest one alteration in wording to Option 2 shown the text below), in order to emphasise the importance of groundwater quality and flow:</p> <p>' impacts on water quality (surface or groundwater) and water supply and flows (surface or groundwater), including effects on Nitrate Vulnerable Zones and Groundwater'</p> <p>As mentioned above, we feel strongly that the Water Framework Directive (WFD) should be referenced in this policy (possibly within the supporting text), as there may be opportunities for waste &amp; mineral sites to help contribute towards improving water quality to achieve WFD targets. Some potential text relating to the WFD is provided below, and may provide a useful starting point when formulating appropriate wording for your plan. This paragraph highlights that the Water Framework Directive (WFD) is relevant to planning:</p> <p>'A significant policy area concerning water quality is the Water Framework Directive (2000) which was transposed into UK law through the Water Environment (WFD) (E&amp;W) Regulations 2003. This commits EU member states to achieving 'good' chemical and ecological status for all inland and coastal waters and will be implemented through river basin management plans. As part of this, Local Planning Authorities must have regard to the impact of any development proposal on the improvement targets set out in the RBMP. Developments must not cause deterioration of the WFD status of any water body, or prevent any water body from reaching good ecological status, except where it can be shown that there is an overriding public interest which would outweigh</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
				WFD requirements. This is only likely to occur in exceptional circumstances.'
135 FCC Environment	0699	Q164		Preference for Option 1
119 Natural England	0932	Q164		Option 2.
118 East Riding of Yorkshire Council	1693	Q164		Prefer Option 2
3013	2060	Q164		Preference for Option 2
2776 Frack Free North Yorkshire	0633	Q164		Option 2. With the addition that no unconventional gas extraction should take place in North Yorkshire. In particular where gas will pass through aquifers. Transportation of hazardous waste and gas extraction activities should not be permitted in close proximity to fresh water sources (streams, aquifers, rivers etc.).
2982 Friends of the Earth	1352	Q164		Do not support either Option, there are parts of each option which may be acceptable. In Option 1, provided the word 'unacceptable' is defined, would agree that permitted operations should not have unacceptable adverse impacts on water, and new and existing development should not contribute to, or be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution. Criteria set out in the NPPF should be the minimum and additional local criteria should be added. Option 2 provides more robust resistance to developments that put water quality at risk, so these criteria should be added to the NPPF ones. It is of limited use to describe criteria that will only be 'considered' , the criteria should be absolute and guaranteed.
3005	1875	Q164		Tipping of colliery spoil should not be allowed on sites which are above major/principle aquifers. Water pollution has arisen at a local large body of water which is adjacent to a tip site which is currently experiencing high levels of red run off on the tip site itself. The colliery tip site is potentially contributing to unacceptable levels of water pollution. Neither of the Options in id66 are robust enough to ensure that the proper safeguards are put in place to protect water quality. It must be clear who has responsibility for dealing with any hazardous situations that may arise through a communities concern regarding water quality.
115 Minerals Products Association	1514	Q164		Favour Option 1 as most flexible, the addition of the potential for the development to contribute to the provision of flood alleviation or other climate change mitigation benefits related to the water environment is an attractive element of Option 2, as industry has an important part to play in this.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2145 Petroleum Safety Services Ltd	0804	Q164		Preference for Option 1.
1577 Lafarge Tarmac	0992	Q164		Preference for Option 1.  Provides most flexibility. However, Option 2 is also supported as it provides for the provision of flood alleviation and other climate change mitigation benefits related to the water environment which is an area the mineral industry believes it has an important role to play.
252 York Potash	1055	Q164		Supports Option 2. In the determination of the appropriateness of any given set of proposals the question of pollutants should be addressed by the pollution control authorities (EA) as a consultee and must not be adopted by the Planning Authorities as a role to be fulfilled. Option 1 does not provide any spatial context of the Plan area. Option 2 does reflect more accurately the view of the NPPF and could specify SPZs that should be avoided. The sequential and exemption tests relating to flooding are retained in the NPPG and so there is little benefit in restating them in the policy.  The third bullet point of option 2 is desirable and should be sought as a form of planning gain but it should not be a criterion which is necessary to gain support of the policy and should be deleted from the option.
2253	2097	Q164		Preference for Option 2.
128 Yorkshire Wildlife Trust	0772	Q164		Supports Option 2. Extraction sites can both benefit and have a negative impact on the water environment it is vital to ensure that maximum beneficial effect. Mineral workings will be present in perpetuity so long term adverse effects have to be prevented.
1022 Constructive Individuals	0185	Q164		Preference for Option 2
2952	0630	Q164		Need to protect the water environment from any possible contamination from shale gas extraction. If Option 2 provides that then that is what we should adopt.
362 Harrogate Friends of the Earth	1389	Q165		The Plan should make it more apparent that development proposals will be turned down where they do not meet the relevant criteria and that some activities, such as shale gas extraction, may never meet the criteria as they simply place too much strain on the water system.
1577 Lafarge Tarmac	0993	Q165		Preference for Option 1 with the addition of the last bullet point under Option 2.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1572	Q165		The MWJP need to adequately reflect the importance of these assets to the local economy, rather than the current focus upon environmental effects of pollution events. Within the Plan area there is a wide range of industries and businesses that rely upon access to clean water resources.
2992 Friends of the Earth	1646	Q165		The Plan should make it more apparent that development proposals will be turned down where they do not meet the relevant criteria and that some activities, such as shale gas extraction, may never meet the criteria as they simply place too much strain on the water system.
2968 York Green Party	2303	Q165		Groundwater should be regarded as a key resource that needs to be safeguarded as are other geological resources of economic and human benefit. Policies should be framed to consider this, not just as a legislative environmental requirement but also from the precautionary principle of securing future uncontaminated supplies.
115 Minerals Products Association	1515	Q165		Option 1 with the addition of the last bullet point of Option 2 is a preferable alternative to either of the two options presented.
2982 Friends of the Earth	1353	Q165		The Plan should make it clearer which development proposals will be turned down where they do not meet the relevant criteria, and also that some activities, such as shale gas extraction, may never meet the criteria as they simply place too much strain on the water system.
297 National Farmers Union	0096	Q166		Concern has been raised about the impact that development will have upon local water supply and availability (when not on the grid network). Should the ability to abstract water (ground or watercourse) be affected, this can have a significant impact upon the business.
2253	2104	Q166		Shale gas extraction uses huge quantities of water, presents risks of contamination to ground and surface water which all need special consideration. The BGS Paper (Stewart 2012) highlights the need for caution regarding fracking and water contamination. The precautionary principle should apply (EU Water Framework Directive) and the use of EIA.
2841 Scarborough, Whitby and Ryedale Green Party	0245	Q166		Neither of the options seem to provide sufficient protection for drinking water supplies which are crucial in large areas which rely entirely on groundwater. There needs to be something stronger. Have to be careful of proposals dealing with hazardous materials in area where there is potential for flooding which could carry these materials onto farm land and ruin it.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

1112	RSPB North	1750	Q166	Support criteria referred to in Option 2, although the last bullet point should refer to climate change adaptation as well as climate change mitigation. The criteria should also refer to the Water Framework Directive objectives and targets, including those for the Humber River Basin District, including naturalising river channels and re-connecting rivers with their floodplains and ground water protection zones. In relation to biodiversity minerals development needs to be carried out at a landscape-scale in order to deliver strategic restoration benefits such as flood alleviation.
2992	Friends of the Earth	1647	Q166	Include local criteria in addition to the minimum criteria of the NPPF. The criteria should take account of particular issues that may be applicable locally such as projected flood risks for the next decades, which water tables are at risks etc.
362	Harrogate Friends of the Earth	1390	Q166	Include local criteria in addition to the minimum criteria of the NPPF. The criteria should take account of particular issues that may be applicable locally such as projected flood risks for the next decades, which water tables are at risks etc.
2950	Blue Lagoon Diving & Leisure Ltd	0812	Q166	Currently the protection afforded is insufficient. The water at neighbouring businesses has been contaminated by the tip at Womersley.

**Section:                      025: Development in Mineral Safeguarding Areas and Mineral Consultation Areas**

**Chapter:                      8**

**Policy No:**

97	Richmondshire District Council	2403	8.98	The word 'negligible' may need some definition as may be challenged on it.
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**Policy No:                      id70**

135	FCC Environment	0702	Q178	Preference for Option 1 and 2
3013		2064	Q178	Preference for Option 3
116	Ryedale District Council	1204	Q178	Supports option 1,2 and 3.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
97 Richmondshire District Council	2404	Q178		<p>Option 1 bullet 3 and 4: these seem to apply to the land south of Colburn, because it is small, isolated from other mineral areas, adjacent to existing built areas and now partially covered by major developments.</p> <p>Option 2 bullet 12: This may cause confusion for emerging development plans. The Land south of Colburn is clearly identified in the strategic direction of growth for Catterick Garrison and has been subject to Duty to Cooperate consultations over the past two years. Although not allocated for development and unlikely to be allocated for development in the next two years, the intention to develop is clear and a material consideration under the NPPF. Should this bullet be amended to include published development plans and their key diagrams? It looks a little odd in a list of minor type exclusions and may be better placed in the Option 1 list, perhaps defined as Option 1 bullet 3.</p> <p>Option 3 bullet 9: The phrase 'Ecclesiastical properties' may not be sufficient for the Equality Act since it only relates to Christian properties. It is most likely a minor point for the wilds of North Yorkshire, but a more inclusive description would be better.</p>
120 English Heritage	0336	Q178		Support combination of Option 1 and Option 2 to ensure that minerals identified in the Mineral Safeguarding area (including building stone) area not sterilised.
2197 CPRE (Harrogate)	1143	Q178		Preference for Options 1,2,3 and 4
1577 Lafarge Tarmac	0998	Q178		All Options supported as they follow the BGS Good Practice Guidance.
1111 The Coal Authority	0886	Q178		<p>Do not support Option 4 as this would not allow prospective developers or decision makers sufficient clarity as to whether the issue of mineral sterilisation would need to be considered in any prospective scheme.</p> <p>The other options set out a proportionate approach towards achieving the avoidance of unnecessary mineral sterilisation without being overly burdensome on LPAs to implement.</p>
115 Minerals Products Association	1521	Q178		Options 1 and 2 closely follow good practice advice from BGS strongly support them
115 Minerals Products Association	1522	Q179		No
115 Minerals Products Association	1523	Q180		No

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

115 Minerals Products Association                      1524                      Q181                      No

**Policy No:**                      id71

97 Richmondshire District Council                      2405                      Richmondshire are in the middle of a land availability assessment, this provides a routine method for agreeing exempt sites as part of the assessment, by overlaying the mineral safeguarding map with the proposed sites. The safeguarding map may be in draft form at the moment, but could be used to pilot this process.

2840 Stubbs, Raine & Dennison  
\*\*\*consulted under 2240\*\*\*                      0174                      Q183                      It is considered essential that lower tier councils should take full account of the need to safeguard mineral recourses to ensure they are not sterilised by non-mineral development.

135 FCC Environment                      0703                      Q183                      Preference for Option 1

1355                      2192                      Q183                      Preference for Option 1

115 Minerals Products Association                      1525                      Q183                      Strongly agree with this option

116 Ryedale District Council                      1271                      Q183                      Support option 1.

1577 Lafarge Tarmac                      0999                      Q183                      Strongly Supports Option 1

94 Craven District Council                      2352                      Q183                      Agree with suggested option

1111 The Coal Authority                      0887                      Q183                      Supports proposed policy approach in the two tier parts of the Plan area

2197 CPRE (Harrogate)                      1144                      Q183                      Preference for Option 1

1140 Sibelco                      1705                      Q183                      Support Option 1

3013                      2065                      Q183                      Preference for Option 1

115 Minerals Products Association                      1526                      Q184                      There is no reference to mineral infrastructure or ancillary development in this section, should there be. It will be likely that a substantial proportion of the foregoing will not be located in an MSA but will receive its own safeguarding designation in the plan. In that case such areas should also be included as part of the MCAs

**Section:**                      **026: Monitoring**

**Chapter:**                      **9**

**Policy No:**

2859		0408		If fracking is permitted monitoring is vital. Establishment of a comprehensive baseline of air, soil and water conditions and samples should be taken of the chemicals used in the hydraulic mixture. The condition of the local road network, including bridges, should also be recorded. This monitoring should be undertaken by an independent body.
116	Ryedale District Council	1205		It is considered that the broad topic areas listed are appropriate and that a single monitoring report is produced once the MWJP is adopted.
1577	Lafarge Tarmac	1000	Q187	Apply the joint approach to policy monitoring, to ensure consistency.
2197	CPRE (Harrogate)	1146	Q187	Would be beneficial to have separate monitoring reports for each Authority Area. This would help monitor the balance of minerals worked and sold from the different Plan areas.
3013		2067	Q187	Produce one report
1355		2193	Q187	The Joint Plan should produce one Monitoring Report.
115	Minerals Products Association	1527	Q187	It would seem consistent with the joint approach to policy to also apply it in monitoring. The plan should contain a commitment to review every five years.
94	Craven District Council	2353	Q187	A joint monitoring approach makes sense given the plan reaches across a joint area.
128	Yorkshire Wildlife Trust	0776	Q188	Area of BAP habitat either created, or to be created through restoration plans for sites would be a valuable indicator.
3013		2068	Q188	Yes
115	Minerals Products Association	1528	Q188	No

**Section:                    027: Mineral Site Submission**

**Chapter:                    10**

**Policy No:**

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
713 Kirkby Fleetham with Fencote Parish Council	1429	Q190		<p>The hypothetical shortfall of sand and gravel in the Plan area to 2030 is assessed as 11.8mt. The area defined as 'North' is not clear. Looking at Appendix 1 there are 2 distinct clusters which can be considered as North</p> <ul style="list-style-type: none"> <li>- MJP17, 21, 33, 42, 46, 47 have total reserves of 28.45 - 29.32mt</li> <li>- MJP04, 06, 14,16, 38, 39, 22 have total reserve of 18.38-19.56mt</li> </ul> <p>This gives a total reserve of 46.94-48.88 mt some 35-37mt in excess of requirements to 2030. Even if only the northern most cluster goes north there is an excess of reserves over need of 17-18mt. Thus there is a considerable over supply of potential sites and so no need for the development of many of the listed sites.</p> <p>A number of identified sites lie close to areas of existing workings, it would make environmental and economic sense to develop these sites first as much of the necessary infrastructure would already be in place.</p>
1101 Yorkshire Geological Society	0180	Q190		<p>The Society is concerned that it is not possible to assess the geological impact of the proposals because the MPA has not yet mapped Local Geological sites including RIGS boundaries within the county. (relevant to both Minerals and waste)</p>
1102 Hanson UK	2367	Q190		<p>Information on specific allocations were detailed in the June 2013 Call for Sites, there are no further comments at this stage.</p>
112 Highways Agency	0447	Q190	MJP02	<p>Site goes under the M62, therefore the Agency will need to know that there will not be an impact from the mining and on J34 nearby.</p>
120 English Heritage	0338	Q190	MJP03	<p>Have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Scheduled Monuments, Historic Park and Garden and other heritage assets in the area. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</p> <ul style="list-style-type: none"> <li>- There are a series of Scheduled earthworks associated with the Stanwick Oppidum (a late iron age nucleated settlement) approximately 350 metres to the east of this site</li> <li>- The boundary of the Grade II Registered Historic Park and Garden of Forcett Hall lies 420 metres to the east of the site. This landscape includes several Listed Buildings including Grade I Listed Forcett Hall and the Grade II* Listed Dovecote, Stable Block, Icehouse, East Gateway Lodges and Grotto.</li> <li>- 550 metres to the south of this area are two moated sites dating from the 12th to 14th centuries which are Scheduled.</li> <li>- The boundary of the East Layton Conservation Area, which contains a number of Listed Buildings, lies 550 metres to the south of this site.</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
112 Highways Agency	0448	Q190	MJP03	Site will increase turning movements on and off the A66, need to check whether there is an accident issue.
112 Highways Agency	0449	Q190	MJP04	Site is adjacent to A168, therefore traffic impact will need to be considered
120 English Heritage	0339	Q190	MJP04	<ul style="list-style-type: none"> <li>- 530 metres from north-eastern edge of site lies scheduled monument of Maiden Bower and Cock Lodge which is a Norman motte and bailey castle, moated site, windmill mound and associated linear outwork.</li> <li>- 1.1km from the eastern extent of this area is a medieval moated site, fishponds and associated field system which is a Scheduled Monument.</li> <li>- Topcliffe Conservation Area, which contains a number of Listed Buildings including the Grade ii* Listed Church of St Columba, lies 950 metres to the north.</li> <li>- There are a number of Listed Buildings in the villages of Asenby (400 metres to the north) and Dishforth (1km to the south-west)</li> </ul>
2197 CPRE (Harrogate)	1148	Q190	MJP04	Restoration to grassland acceptable, roads serving the site relatively good. Site is away from the villages so loss of amenity less apparent. Does not state how deep the mineral is and if the site is able to meet stringent criteria.
61 National Grid Gas and	0111	Q190	MJP04	The site is crossed by high pressure gas pipeline FM13 Yarforth to Towton. Underground pipelines are protected by permanent agreement with landowners or under public highways under licence. There is a requirement that no permanent structures are built over or under pipelines within zone specified, and that no materials or soil are stacked or stored on top of the pipeline route.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2373	Q190	MJP04	<p>No objections on ecological grounds but opportunities for restoration of BAP priority habitats should be sought, particularly in view of the proximity of the nationally important historical botanical site at Leckby Carr, just to the east of the site. Leckby Carr was a raised bog which was lost to agricultural improvements and forestry in the C19th and C20th.</p> <p>Impacts on the landscape setting of the River Swale corridor would be of significant concern in this area. Clumps of woodland which frame the narrow, flat corridor are important since they enclose the riverside and channel views. The area can be viewed from crossing points over the river and these viewpoints and associated woodlands should be protected. Many footpaths cross the site and since there are few footpaths providing access to the river corridor these paths are important in providing access for recreation to the riverside and should be protected from encroachment from quarrying activities. Development that would result in increased traffic movements, which could change the relatively peaceful character of the landscape would not be supported. Baldersby park is an important feature in the area and the setting of the park includes the River Swale corridor. There is limited capacity for change and the landscape is highly sensitive to development.</p>
2197 CPRE (Harrogate)	1149	Q190	MJP05	<p>Been put forward before but was discounted. Roads unsuitable for HGV traffic, will impact on nearby school and businesses. Will add to the cumulative impact of traffic from the nearby business park.</p>
120 English Heritage	0340	Q190	MJP05	<ul style="list-style-type: none"> <li>- The boundary of Farnham Conservation Area which contains a number of Listed Buildings including a Grade I Listed Church of St Oswald lies 1.5km from the eastern edge.</li> <li>- The boundary of Scriven Conservation Area, which contains a number of Listed Buildings including Grade II* Listed Home Farmhouse, lies 1.9km from south eastern edge.</li> <li>- The northern edge of Knaresborough Conservation area lies 2.6 km from southern boundary of this site.</li> <li>- there is a Grade II* Listed Building (Scotton Old Hall) 400 metres from the south-western edge of the site.</li> <li>- There are numerous Listed Buildings in the settlements surrounding this site the nearest being 325 metres from the southern edge of this area.</li> </ul>
1100 Aggregate Industries	0485	Q190	MJP05	<p>Supports proposed working of Sand and Gravel at the site.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2374	Q190	MJP05	<p>No objections on ecological grounds but opportunities for restoration of BAP priority habitats should be sought, following a comprehensive survey, particularly in view of the proximity of Farnham Mires SSSI. The SSSI appears to be a remnant of a much more extensive area of mires which almost stretched as far east as this site at the time of the first edition OS maps in mid C19th, linking into Brearton Moor.</p> <p>In terms of landscape impact the trees help integrate the settlement with the landscape and are important features in the area plus parkland trees within grounds of Nidd Hall. Nidd Hall and its associated parkland is important to the landscape character of the area and should be protected and the area also provides a setting for Ripley Park, which is a registered historic park and garden. There is limited capacity for change and the landscape is very sensitive to development.</p> <p>In terms of heritage and design impact there could be a loss of tranquillity to Quaker burial ground.</p>
120 English Heritage	0341	Q190	MJP06	<ul style="list-style-type: none"> <li>· This site lies in an area of known archaeological importance containing remains from the Mesolithic, Bronze Age, Roman and Medieval periods.</li> <li>· There are three Scheduled round barrows 770 metres from the southern boundary of the site</li> <li>- The southernmost part of this site is situated just over 1km from the northern most Scheduled Henge at Thornborough.</li> <li>· There is a Scheduled moated site at Upsland Farm, 1.7 km to the south-east of this area</li> <li>· The westernmost edge of this site lies approximately 1.5 km from the boundary of Well Conservation Area which includes a number of Listed Buildings including the Grade I Listed Hall and Church of St Michael.</li> <li>· The easternmost edge of this site lies approximately 2.3 km from the boundary of Kirklington Conservation Area which includes a number of Listed Buildings including the Grade I Listed Church of St Michael and Grade II* Listed Hall.</li> <li>· There are a number of Grade II Listed Buildings at Nosterfield (the nearest being less than 1 km from the southern boundary of the site).</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0342	Q190	MJP07	<ul style="list-style-type: none"> <li>· This site lies in an area of known archaeological importance containing remains from the Mesolithic, Bronze Age, Roman and Medieval periods.</li> <li>· There are three Scheduled round barrows 1.1 km from the southernmost extent of this area</li> <li>· The southernmost part of this site is situated just over 1km from the northernmost Scheduled Henge at Thornborough.</li> <li>· There is a Scheduled moated site at Upsland Farm, 2.5 km to the south-east of this area</li> <li>· The westernmost edge of this site lies approximately 400 metres from the boundary of Well Conservation Area which includes a number of Listed Buildings including the Grade I Listed Hall and Church of St Michael.</li> <li>· The easternmost edge of this site lies approximately 3 km from the boundary of Kirklington Conservation Area which includes a number of Listed Buildings including the Grade I Listed Church of St Michael and Grade II* Listed Hall.</li> <li>· There are a number of Grade II Listed Buildings at Nosterfield (the nearest being less than 700 metres from the southern boundary of the site).</li> </ul>
116 Ryedale District Council	1207	Q190	MJP08	Acceptable in principle subject to Development Management issues being satisfactorily addressed.
120 English Heritage	0343	Q190	MJP08	<ul style="list-style-type: none"> <li>· This site is situated 750 metres to the south of a Scheduled Monument (Medieval settlement earthworks on and around Town Green)</li> <li>· Two Grade II Listed Buildings (Settrington Grange Farmhouse and the farm buildings to the north) lie within 360 metres of the eastern boundary of this site.</li> <li>· The boundary of Settrington Conservation Area, which has numerous Listed Buildings including the Grade II* Listed Church of All Saints and the Riding School lies 750 metres from the eastern edge of this site.</li> </ul>
120 English Heritage	0381	Q190	MJP09	· Selby Lock, Lock House and bridge 375 metres to the west of this site are Grade II Listed structures

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2375	Q190	MJP10	<p>No objection on ecological grounds in the context of the recently reviewed restoration scheme, provided that the SINC at Five Ponds Wood and veteran and mature trees and hedgerows along field boundaries are retained and protected and any extension is integrated into wider restoration scheme which maximises biodiversity opportunities e.g. for restoration of magnesian limestone grassland, in accordance with the Harrogate District Biodiversity Action Plan.</p> <p>Concerns have previously been expressed regarding visual impact on the AONB, SINC, loss of field boundaries, ecological impacts, landscape setting of listed buildings and impact on historic patterns and landscape features.</p>
2210	1815	Q190	MJP10	Site has been identified as containing prehistoric settlement remains of high importance, currently protected by grass land reversion in High Level Stewardship Scheme.
2197 CPRE (Harrogate)	1150	Q190	MJP10	Extension to existing quarry, has good road network. The site will include the use of arable land but has merits as infrastructure in place.
120 English Heritage	0344	Q190	MJP10	<p>The Grade II* Listed Stainley Hall lies 530 metres from the eastern boundary of this area</p> <ul style="list-style-type: none"> <li>· Friars Hurst, a Grade II Listed Building lies just 270 metres from the northern edge of this site.</li> <li>· There is a group of four Grade II Listed Buildings around Old Sleningford Hall, the nearest being 650 metres from the western edge of this site.</li> <li>· There is a group of Grade II Listed Buildings at Sleningford Park the nearest being 520 metres to the north of the site.</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2376	Q190	MJP11	<p>No ecological objections in principle. There may be an opportunity to re-create rare magnesian limestone grassland and explore geodiversity. Current restoration plans at the existing Gebdykes Quarry should be reviewed as these include no thorough ecological survey of this very old quarry and no coherent ecological objectives. Any expansion package ought to look to re-incorporate biodiversity objectives into the restoration of the existing ecologically mature site, in addition to looking to enhancements in association with the proposed new workings.</p> <p>In terms of landscape impact the site is dominated by the course of the River Ure and there are good views across the river corridor. The existing quarrying already detracts from the landscape and in addition there are several prominent large scale farm buildings. Every opportunity should be taken and a programme of restoration should be developed to create and manage wildlife habitats and the promotion of appropriate woodland planting along the river corridor and planting of hedgerow trees. The area is sensitive to further change and further extension to the quarry could have a negative impact on the setting of the river corridor and the approaches to Masham from the north and on landscape character and views.</p>
120 English Heritage	0345	Q190	MJP11	<ul style="list-style-type: none"> <li>· There is a Grade II Listed dovecote 640 metres from the eastern edge of this site.</li> <li>· Northern edge of Masham Conservation Area is 1.6 km to the south of this site</li> <li>· The south-eastern edge of this site lies 2.5 km from the boundary of Well Conservation Area which includes a number of Listed Buildings including the Grade I Listed Hall and Church of St Michael.</li> <li>· Thornton Watlass Conservation Area, which includes a number of Listed Buildings, is 2.2 km from the northern edge of this site</li> <li>· The boundary of the Grade II Registered Historic Park and Garden of Thorpe Perrow lies 2.3 km from this site's eastern edge. This landscape includes several Listed Buildings including the Grade I Listed Snape Castle, and the Grade II* Listed Thorpe Perrow Hall.</li> <li>· Grade II Listed Low Mains Farmhouse lies just over 1 km from the western edge of this site</li> <li>· Grade II Listed Low Burton Hall lies 1.2 km from southern boundary.</li> </ul>
116 Ryedale District Council	1208	Q190	MJP12	<p>Acceptable in principle. However, there will be transport issues associated with additional traffic movements to/from the quarry through Norton/Malton. This could have negative impact on the designated air quality management zone in Malton. Concerned about the potential negative economic impacts on the local community, including the horse racing industry.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2854 Norton Action Group	0277	Q190	MJP12	Whitewall quarry is not suitable for further extraction of limestone beyond the existing planning permit. The new proposal will increase the level of extraction which will result in a substantial increase in the volume of heavy goods vehicles passing through Malton and Norton. Extraction is currently expected to cease in 2023 and restoration to then take place.
3019	1805	Q190	MJP12	Object to the site. The size of the quarry and number of business operations based there has increased substantially over the past few years. Number of HGV movements have also increased with most travelling through Malton and Norton. Increased impact of dust, noise Air Quality Management zone and on local businesses. Concerned about the potential impact blasting may have on the aquifer possibly causing water pollution. The more operations allowed in the quarry the higher the risk and impact. Objected to planning application for asphalt plant at site.
2824	0102	Q190	MJP12	Whitewall Quarry is not a suitable site for further extraction of limestone beyond the existing planning permission. The proposal to increase extraction at this site would lead to an increase in HGVs passing through Malton and Norton by 58%.  The proposal disregards the planning permission which requires the quarry to build sufficient bund and tree planting.
120 English Heritage	0346	Q190	MJP12	· There are a number of Scheduled Monuments 1.2 km to the east of this site (The Three Dykes and a round barrow at West Wold Farm). · There are two Grade II Listed Buildings (Whitewall House and Whitewall Cottages and the attached stable building) at Whitewall Stables 790 metres to the north of this site. · The boundary of Langton Conservation Area, which includes several Listed Buildings, lies 1.6 km to the south of this site.
2854 Norton Action Group	0278	Q190	MJP13	Whitewall quarry is not suitable for a materials recycling facility. The site has no ready access to the County's trunk roads so the increased amount of HGVs will have to pass through Malton and Norton or along tertiary roads when passing south. The existing traffic from the site is already causing problems in the towns.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0384	Q190	MJP13	<ul style="list-style-type: none"> <li>· There are a number of Scheduled Monuments 1.2 km to the south-east of this site (The Three Dykes and a round barrow at West Wold Farm).</li> <li>· There are two Grade II Listed Buildings (Whitewall House and Whitewall Cottages and the attached stable building) at Whitewall Stables 470 metres to the north of this site.</li> <li>· The boundary of Langton Conservation Area, which includes several Listed Buildings, lies 2.3 km to the south of this site.</li> </ul>
116 Ryedale District Council	1210	Q190	MJP13	The principle of the proposal is acceptable but there are concerned that there will be transport issues associated with additional traffic movements to/and from the quarry through Norton/Malton. This could have a negative impact on the designated air quality management zone in Malton. Further concerns regarding potential negative impacts on the local community, including horse racing industry.
2197 CPRE (Harrogate)	1152	Q190	MJP14	Extension to existing quarry, restoration to wet woodland more sustainable than another lake.
120 English Heritage	0347	Q190	MJP14	<ul style="list-style-type: none"> <li>· These two sites lie in an area of known archaeological importance containing remains from the Mesolithic, Bronze Age, Roman and Medieval periods.</li> <li>The northernmost site Manor Farm West</li> <li>· This area lies just 170 metres from the edge of East Tanfield deserted medieval village which is a Scheduled Monument.</li> <li>· It is situated only 750 metres from the southernmost Scheduled henge at Thornborough</li> <li>· Its northern edge is 700 metres from a Scheduled round barrow</li> <li>· Manor Farmhouse, a Grade II Listed Building, lies just 180 metres from its eastern edge. We have concerns about the impact which mineral extraction from the northernmost site might have upon elements which contribute to the significance of the Scheduled Monuments and other heritage assets in the area. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</li> <li>The southernmost site Pennycroft/Thorneyfields</li> <li>· This area lies directly opposite the boundary of the Grade II Registered Historic Park and Garden at Norton Conyers. This landscape includes several Listed Buildings including the Grade II* Listed Norton Conyers House and its stable block.</li> <li>· Its northern corner is 1.2 km from the site of a Scheduled Roman Villa</li> <li>· Its southern corner lies 1.6 km from the Scheduled Henge at Nunwick</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2377	Q190	MJP14	<p>Object to this proposal on ecological grounds as the creation of a large, deep water body immediately adjacent to the High Batts and the River Ure (both part of Ripon Parks SSSI) may have adverse impacts on the riparian SSSI and its floodplain, including wet woodland and features that have been identified as qualifying in this section of the river as 'active shingle river' - a key element of the UK BAP priority rivers habitat. These potential adverse impacts have not been fully addressed in the Environmental Statement which has been submitted with the planning application to date.</p> <p>The site floods regularly, consideration has not been given to the requirement under the current proposals to constrain the river within a narrow channel, to isolate it from the adjacent deep lake, not just during the course of the working life of the quarry but post-restoration in perpetuity. The proposals would require the hydromorphological processes which underline the natural dynamic of an active shingle river, a UK BAP priority habitat. The river would be prevented from naturally shifting across the flood plain over time.</p> <p>The only sensible restoration scheme at this very sensitive site would be to enhance the rivers floodplain features for nature conservation. This would depend on a landform being created at critical shallow levels in relation to the river. This is not the restoration philosophy which is currently proposed and may not be feasible following very deep extraction.</p> <p>The site has very high ecological sensitivity and there is great uncertainty that adverse impacts on the SSSI could be adequately mitigated for. In light of this uncertainty this site should not be allocated unless further assessment demonstrates the feasibility of a suitable restoration scheme which would not risk damaging the geohydromorphology of the river and SSSI.</p>
61 National Grid Gas and	0112	Q190	MJP14	<p>The site is crossed by high pressure gas pipeline FM07 Sutton Howgrave to Pannal. Underground pipelines are protected by permanent agreement with landowners or under public highways under licence. There is a requirement that no permanent structures are built over or under pipelines within zone specified, and that no materials or soil are not stacked or stored on top of the pipeline route.</p>
120 English Heritage	0348	Q190	MJP15	<p>There is a group of four Grade II Listed Buildings at Redshaw Hall 720 metres to the east of this site</p>



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2197 CPRE (Harrogate)	1153	Q190	MJP15	Support the mothballed site being in the Plan, good road network and not near any properties or built up areas.
330 Harrogate Borough Council	2378	Q190	MJP15	Strongly object to the allocation of this site due to the open character of the landscape, which is not capable of accepting any new development. Potential impacts on Natura 2000 site and the AONB are high level constraints.
119 Natural England	0922	Q190	MJP15	The Site is within the Nidderdale AONB and adjacent to the South Pennine Moors SPA and SAC. As less ecologically sensitive sources of silica sand exist outside the AONB the inclusion of this site is not supported.
330 Harrogate Borough Council	2379	Q190	MJP16	<p>No objection on ecological grounds.</p> <p>Proposed restoration plan in an improvement on the original site restoration. The current restoration proposals set the proposed the proposed extension with a wider landscape ecology setting which includes the floodplain of the River Ure and the adjacent Marfield Fen SSSI as well as Marfield Gravel Pit SINC and aims to create strong links between habitats at the previously restored SINC, the current quarry and proposed new extension.</p> <p>The long-term vision of a landscape-scale suite of high quality wetlands set within the river Ure Valley offers the potential, not only for enrichment of biodiversity but also as an important additional visitor attraction for Masham as a gateway to the dales and moors. If social and environmental gains are to be maximised, consideration should be given to entrusting the long-term (post-quarrying) future of the integrated site to a proven nature conservation body.</p>
120 English Heritage	0349	Q190	MJP16	<ul style="list-style-type: none"> <li>· The northern edge of Masham Conservation Area, which includes numerous Listed Buildings including the Grade II* Church of St Mary, lies 720 metres from the south-eastern corner of this area</li> <li>· The eastern edge of Fearby Conservation Area, which includes a number of Listed Buildings, lies 1.1 km from the western corner of this site</li> <li>· The site lies 1.3 km from the northern edge of the Grade II* Registered Historic Park and Garden at Swinton Castle. The principal building in this landscape, Swinton Castle, is Grade II* Listed.</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2930	1882	Q190	MJP17	Object to site as would adversely impact on the setting of Hornby Castle, a Grade 1 Listed Building notably in views from the east and south east from Leeming Lane. It would adversely impact on the setting of the historic parkland and landscaped approach from the east laid out by Capability Brown. Noise and dust from the quarry would adversely impact upon the farming of the land west of the Hackforth-Catterick road.
120 English Heritage	0350	Q190	MJP17	- The Bainesse Roman roadside settlement and Anglian Cemetery at Catterick (a Scheduled Monument) lies less than 650 metres to the north of this site. · There are some Scheduled World War II fighter pens and associated defences 440 metres from the north-eastern corner of this area · There is a Scheduled round barrow 1.4 km to the west of this area · Given the proximity of this site to these monuments and to the A1 (where recent archaeological work in connection with its upgrading has identified a potential Mesolithic site at Killerby on the eastern side of the road), there is a high likelihood of important archaeological remains in this area some of which may, potentially, be of national importance. · The Grade II Listed Rudd Hall would be less than 300 metres from the western boundary of this area · The Grade II Listed Ghyll Hall would be less than 100 metres from the proposed boundary of this area
112 Highways Agency	0450	Q190	MJP17	Site adjacent to A1(M). Part of the site may be on then line of the improvement or the Non-Motorised User route in this location as part of the upgrade.
119 Natural England	0923	Q190	MJP21	This site is adjacent to and appears to include the River Swale SINC.
297 National Farmers Union	0097	Q190	MJP21	Concerned about the impact upon water supply (South Lowfield Stell, Fiddale beck and North Lowfield Stell).
713 Kirkby Fleetham with Fencote Parish Council	1430	Q190	MJP21	Subject to a planning application to which have submitted objections. Also object to submitted site, there is an over supply of sand and gravel. Have supplied previous documentation in relation to previous stages of the Core Strategy.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0351	Q190	MJP21	<ul style="list-style-type: none"> <li>· The site lies within 140 metres of a number of World War II Fighter Pens and associated defences (to the north-west) which are Scheduled Monuments.</li> <li>· 530 metres to the north of this site is the Scheduled Castle Hills Medieval Motte and Bailey Castle</li> <li>· The northern extent of the site lies 1.4 km to the south of the Scheduled Bainesse Roman Roadside Settlement.</li> <li>· It lies 1.4 km to the north of the Scheduled motte and bailey castle and medieval settlement earthworks within Hall Garth.</li> <li>· Given the proximity of this site to these monuments and to the A1, there is a high likelihood of important archaeological remains in this area some of which may, potentially, be of national importance.</li> <li>· There are numerous Listed Buildings around this area including two Grade II* Listed Buildings (Kirkby Fleetham Hall and the Church of St Mary) both of which lie less than 800 metres from the eastern edge of this area. The Grade I Listed Kiplin Hall lies less than 800 metres from the north-eastern edge of this site.</li> <li>· The development of this site would be within 55 metres of the Grade II Listed Killerby Hall.</li> <li>· Kirkby Fleetham Conservation Area lies just over 1 km to the south of this site.</li> </ul>
713 Kirkby Fleetham with Fencote Parish Council	1433	Q190	MJP21	Objects to the site. Representation includes copy of previously submitted comments (Minerals Core Strategy) which highlights objection to site on the following grounds: Environmental and Amenity Issues; Economic issues, Transport and access
112 Highways Agency	0451	Q190	MJP21	Site adjacent to A1(M). Part of the site may be on the line of the local road network being provided as part of the upgrade.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1270 Kirkby Fleetham Environmental Action Group	1555	Q190	MJP21	<p>Objects to the site.</p> <p>The need for additional provision is understood, however it is considered that this can be achieved through the grant of approval for extensions to existing quarries, without the for the development of new one.</p> <p>There are a number of Scheduled Monuments and known historic assets. There is likelihood that there will be more archaeological remains in the area. There are two grade II* listed buildings in the area (Kirkby Fleetham Hall, Church of St Mary) Additional Grade II (at Killerby Hall). There is considerable concern about the effects upon river related matters. The site is located in a flood Plain. There are otters, water voles and crayfish which would be affected. There are large expanses of injurious weed Ragwort and invasive Himalayan Balsam. Concerns about the impact of the site on watercourses which are used as drinking places for livestock. Concerned about the Impact on residential amenity and Habitats and landscape</p>
120 English Heritage	0352	Q190	MJP22	There are two Grade II* Listed Buildings (The Red House and the Church of St Paul) 670 metres to the west of this site
135 FCC Environment	0899	Q190	MJP23	Revision to the site following operational discussions.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1574	Q190	MJP23	<p>The site is in the greenbelt and locally important Landscape Area and has the potential to have effects on underlying water resources.</p> <p>The Potential extension to an existing mining operation will cause harm to the openness of the Green Belt and Purpose including land within this designation. The proposal would also likely harm the character and visual amenity of the area, and the amenity of nearby residents. The quality of water within the aquifer underlying the site will also be put at substantial risk by such development.</p>
61 National Grid Gas and	0116	Q190	MJP23	The site is crossed by XC overhead line, Monk Fryston to Poppleton. Potential operators of the site should be aware of the National Grid policy to seek to retain existing overhead lines in-situ. The site is also situated in close proximity to high pressure gas pipeline FM07. Underground pipelines are protected by permanent agreement with landowners or under public highways under licence. There is a requirement that no permanent structures are built over or under pipelines within zone specified, and that no materials or soil are stacked or stored on top of the pipeline route.
112 Highways Agency	0452	Q190	MJP23	Site adjacent to A64, therefore may be a traffic impact.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0353	Q190	MJP23	<ul style="list-style-type: none"> <li>· This site lies 1.6 km from the northern edge of the Registered Battlefield at Towton.</li> <li>· There are several Listed Building around Hazlewood Castle (1.6 km to the south-west of this area) including the Grade I Listed Hazlewood Castle and the Roman Catholic Chapel of St Leonard</li> <li>· The section of Roman Road 2.3 km to the west is a Scheduled Monument.</li> </ul>
120 English Heritage	0382	Q190	MJP24	<ul style="list-style-type: none"> <li>· The boundary of Womersley Conservation Area (which contains a number of Listed Buildings including the Grade I Listed Church of St Martin and the Grade II* Listed Womersley Park, coach house and stables) lies 2.3 km to the south-east of this site</li> <li>· This site lies 2.6 km from the northern edge of the Scheduled Monument of Womersley medieval settlement remains and Victorian ice house</li> </ul>
120 English Heritage	0385	Q190	MJP26	<ul style="list-style-type: none"> <li>· There is a group of Grade II Listed Buildings at Campsmount Home Farm 1.8 km to the east of this site</li> <li>· The boundary of Campsall Conservation Area (which contains a number of Listed Buildings including the Grade I Listed Church of St Mary Magdalene and The Old Rectory) lies 2.2 km to the east of this site</li> <li>· There are a couple of Scheduled Monuments (a multivallate enclosure and a manorial complex) 2 km from the eastern boundary of this area</li> <li>· The boundary of Kirk Smeaton Conservation Area (which contains a number of Listed Buildings including the Grade II* Listed Church of St Peter) lies 1.5 km to the north of this site</li> </ul>
120 English Heritage	0386	Q190	MJP27	<ul style="list-style-type: none"> <li>· The Old Stable Court, a Grade II* Listed Building, lies 1.8 km from the southern edge of this site.</li> <li>· The boundary of Womersley Conservation Area (which contains a number of Listed Buildings including the Grade I Listed Church of St Martin and the Grade II* Womersley Park, coach house and stables) lies 2.3 km to the south-east of this site.</li> <li>· This southern boundary of this site lies 2.6 km from the northern edge of the Scheduled Monument of Womersley medieval settlement remains and Victorian ice house</li> </ul>
120 English Heritage	0354	Q190	MJP28	There is a Scheduled Monument (a multivallate enclosure) 2.6 km to the north-east of this area
135 FCC Environment	0898	Q190	MJP28	Revision to the site following operational discussions.
119 Natural England	0924	Q190	MJP29	This site is approximately 110m from Brockadale SSSI and SINCC. As part of the Selection process ensure that interest features are not harmed.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0355	Q190	MJP29	· The boundary of Wentbridge Conservation Area lies 700 metres to the west of this site · Wentbridge Viaduct (470 metres to the west of this site) is a Grade II Listed Building
120 English Heritage	0356	Q190	MJP30	There is a high likelihood of important archaeological remains in this area some of which may, potentially, be of national importance. The Vale of Pickering area exhibits evidence of continuing human habitation and activity from the early prehistoric periods through the Roman period, and up to the present day. The buried prehistoric landscapes and the unique, continuous "ladder" settlements are an extraordinary survival of human activity on a landscape scale, preserved beneath thick sand-blown deposits across the Vale.
116 Ryedale District Council	1206	Q190	MJP30	Acceptable in principle subject to Development Management Issues being addressed. The Spring on the site provides a private water supply to properties at East and West Knapton. The Council would object to the site on the basis of water supply if the security of the supply is jeopardised.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1575	Q190	MJP31	The site is located within the green belt and Locally Important Landscape Area, and adjoins a locally important Nature Conservation Area. The development would cause harm to the openness of the greenbelt and is likely to harm the character and visual amenity of the area and amenity of nearby residents
61 National Grid Gas and	0113	Q190	MJP31	The site is crossed by high pressure gas pipeline FM07 Sutton Howgrave to Pannal. Underground pipelines are protected by permanent agreement with landowners or under public highways under licence. There is a requirement that no permanent structures are built over or under pipelines within zone specified, and that no materials or soil are not stacked or stored on top of the pipeline route.
120 English Heritage	0357	Q190	MJP31	· This site lies less than 500 metres from the northern boundary of the Registered Battlefield at Towton. · There are several Listed Building around Hazlewood Castle (2.4 km to the south-west of this area) including the Grade I Listed Hazlewood Castle and the Roman Catholic Chapel of St Leonard We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Registered Battlefield at Towton. This is a designated heritage asset which the NPPF has identified as being of the highest significance and where national policy guidance makes it clear that substantial harm or loss should be exceptional.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2380	Q190	MJP32	<p>There is an ecological objection to this proposed allocation, pending the clarification of potential impacts on ancient woodland. The part of Barnsneb Wood directly impacted appears to be included in the NCC's provisions Inventory of Ancient Woodland so there would be a presumption against development on a AW site (NPPF para 118). The trees of the hedgerow to the east of the northern field are shown in the first edition OS map and are likely to be veteran. These and the woodland would require to be buffered from development. Further disruption to trees and hedgerows would be likely to be caused by the provision of access to the site.</p> <p>In terms of landscape impact the area has good woodland cover and attractive views, the area includes Registered Ancient Semi-Natural woodland at Barnsneb Wood. The woodland is important to the historic landscape character of the area and should be protected. The overall aim is to encourage the management of woodland to improve biodiversity and woodland structure and development which is likely to result in negative impacts on these woodlands should be avoided. The area also provides the eastern setting to Ripley Park, which is a Registered Historic Park and Garden. There is limited capacity for change and the landscape is highly sensitive to development.</p>
120 English Heritage	0358	Q190	MJP32	<ul style="list-style-type: none"> <li>· This site lies less than 400 metres from the Scheduled Cistercian grange and medieval settlement at High Cayton.</li> <li>· There is a group of Listed Buildings at High Cayton the nearest of which would be within 500 metres from the eastern boundary of the northernmost area.</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Scheduled Monuments and other heritage assets in the area. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional</p>
2197 CPRE (Harrogate)	1155	Q190	MJP32	Close to two disused quarries, should be retained in the Plan
119 Natural England	1008	Q190	MJP33	This site is adjacent too and appears to include the River Swale SINC.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0359	Q190	MJP33	<ul style="list-style-type: none"> <li>· There are three Listed structures at Kirkby Hall lying between the two southern extensions of this area. These include two Grade II* buildings (Church of St Mary and Kirkby Fleetham Hall).</li> <li>· The Grade II Hook Car Farmhouse lies less than 100 metres from the western edge of the site</li> <li>· The Grade II Langton Farmhouse lies 200 metres from the eastern edge of the site</li> <li>· The Grade II North Lowfield Farmhouse lies less than 350 metres from the south-eastern edge of the site</li> <li>· The Grade II Kiplin Farmhouse lies less than 500 metres from the northern edge of the site</li> <li>· Kirkby Fleetham Conservation Area lies less than 800 metres to the south of this area. We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Grade II* Listed Building and other heritage assets in the area. The NPPF makes it clear that Grade II* Listed Buildings are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</li> </ul>
713 Kirkby Fleetham with Fencote Parish Council	1431	Q190	MJP33	<p>This site was put forward as a submitted site in the previous Minerals Core strategy where it was discounted. Object to site due to lack of need, high adverse landscape or visual effects and poor accessibility.</p> <p>Have provided documentation which relates to previous stages of the Core Strategy.</p>
1100 Aggregate Industries	0483	Q190	MJP33	<p>Supports the site, a draft Environmental Statement is available in relation to the proposed working of sand and gravel.</p>
1505	0782	Q190	MJP33	<p>This is not a new site, it was excluded from the previous framework due to lack of need, high adverse impact on the landscape and poor accessibility. Support Kirkby Fleetham with Fencote PC objections and Kirkby Fleetham Environmental Protection Groups observations to this site option.</p>



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1270 Kirkby Fleetham Environmental Action Group	1556	Q190	MJP33	<p>Objects to the site.</p> <p>The need for additional provision is understood, however it is considered that this can be achieved through the grant of approval for extensions to existing quarries, without the for the development of new one.</p> <p>There are a number of Scheduled Monuments and known historic assets. There is likelihood that there will be more archaeological remains in the area. There are two grade II* listed buildings in the area (Kirkby Fleetham Hall, Church of St Mary) Additional Grade II (at Killerby Hall). There is considerable concern about the effects upon river related matters. The site is located in a flood Plain. There are otters, water voles and crayfish which would be affected. There are large expanses of injurious weed Ragwort and invasive Himalayan Balsam. Concerns about the impact of the site on watercourses which are used as drinking places for livestock. Concerned about the Impact on residential amenity and Habitats and landscape</p>
1505	0781	Q190	MJP33, M	<p>It is understood that there is considerable over supply of potential sand and gravel sites in this area up to 2030. The specific sites in question are MJP33 and MJP43. Also in the vicinity is MJP21 which is already subject to an application. We support the comments made by Kirkby Fleetham and Fencote Parish Council. For a local community to be faced with 3 quarry proposals (4 if you include MJP17) within a 5 mile radius could be devastating and detrimental to residents.</p>
119 Natural England	1009	Q190	MJP34	<p>Support the permitting of extraction from under the North York Moors National Park with surface structures located outside the National Park. There are large areas outside the park where surface structures can be located and where, due to the depth of extraction, significant environmental effects are most likely to occur.</p> <p>In accordance with the NPPF encourage the Joint Authorities to develop policies which direct potash extraction and related developments to locations in North Yorkshire which avoid adverse effects on the natural environment (protected sites, protected species, priority habitats and species) and designated landscapes (National Parks and AONBs).</p> <p>Given the quantity of mineral that would be extracted, any decision regarding the location of surface structures must consider the implications of transporting and processing the material upon the local and wider environment.</p>
120 English Heritage	0360	Q190	MJP34	<p>There are a vast number of designated heritage assets in this part of the National Park.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2921 The Strickland Estate	1399	Q190	MJP34	The potash resource identified within the plan area should be secured for future mineral extraction. The York Potash development should be allocated as a preferred site for future extraction.
713 Kirkby Fleetham with Fencote Parish Council	2401	Q190	MJP34	Objects to the site. Representation includes copy of previously submitted comments (Minerals Core Strategy) which highlights objection to site on the following grounds: Environmental and Amenity Issues; Economic issues, Transport and access.
2892 ****Consulted under 2891****	0588	Q190	MJP34	objects to the site on the grounds that it is damaging to the environment and will be a blight on the landscape reducing the quality of life of residents surrounding the quarry.
112 Highways Agency	0453	Q190	MJP34	Very large site, depending on intensity of use it may have an impact on Strategic Road Network.
330 Harrogate Borough Council	2381	Q190	MJP35	<p>No objection on ecological grounds in principle but the River Nidd is ecologically sensitive and a regionally important Green Infrastructure Corridor. Any workings would have to be sensitive to the river corridor and its wildlife and provide opportunities for enhancement (these might integrate with mitigation already in place for A1(M).</p> <p>In terms of landscape impact this is a large scale area with blocks of woodland on a open landscape where the A1 cuts through the area. The gently rolling landform and open nature of the landscape combined with uniform land use in random fields have resulted in a landscape which is sensitive to inappropriate development. The area is important to the setting of Ribston park, there is limited capacity for change and the landscape is sensitive to development.</p> <p>Object to the proposal on the basis of heritage and design impact unless the proposal would not significantly impact on the setting of designated assets and buildings at Ruddings Farm</p>
2197 CPRE (Harrogate)	1156	Q190	MJP35	New quarry on BMVL, road access acceptable, needs thorough site assessment regarding sustainability of land use.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0361	Q190	MJP35	<ul style="list-style-type: none"> <li>· This site lies just over 100 metres from the southern edge of the Grade II Registered Historic Park and Garden of Ribston Hall. This landscape includes several Listed Buildings including and the Grade II* Listed Ribston Hall and stables, and the Chapel of St Andrew.</li> <li>· The Grade II* Listed Walshford Lodge and the walls to Ribston Hall are situated less than 300 metres from the northern corner of this site.</li> <li>· There is a group of Listed Buildings at Walshford 400 metres to the north of this area</li> <li>· The boundary of Hunsingore Conservation Area, which includes a number of Listed Buildings and the site of a Scheduled medieval hall, lies 900 metres from the north-eastern edge of this area.</li> <li>· The Grade I Listed Church of St Michael in Cowthorpe lies less than 700 metres from the north-eastern edge of this area.</li> </ul>
112 Highways Agency	0454	Q190	MJP35	Site goes across A1(M), important to know there will not be an impact in A1(M)
61 National Grid Gas and	0114	Q190	MJP37	The site is crossed by high pressure gas pipeline Yafforth to Towton. Underground pipelines are protected by permanent agreement with landowners or under public highways under licence. There is a requirement that no permanent structures are built over or under pipelines within zone specified, and that no materials or soil are stacked or stored on top of the pipeline route.
120 English Heritage	0362	Q190	MJP37	<ul style="list-style-type: none"> <li>· This site lies just less than 1 km from the northern edge of the Grade II Historic Park and Garden of Allerton Park. This landscape includes the Grade I Listed Mansion, and the Grade II* Listed Church of St Mary and the Temple of Victory</li> <li>· The boundary of the Marton cum Grafton Conservation Area, which includes a number of Listed Buildings, lies 1.5 km to the north of this site.</li> <li>· The boundary of the Little Ouseburn Conservation Area (which includes the Grade I Listed Church of The Holy Trinity and the Grade II* Listed Thompson Mausoleum and Carriage Gates at New Lodge) lies 1.2 km to the south-east of this area.</li> <li>· The boundary of the Great Ouseburn Conservation Area (which includes the Grade II* Listed Church of St Mary) lies 1.2 km to the east of this area.</li> <li>· The boundary of the Whixley Conservation Area (which includes the Grade II* Listed Church of the Ascension) lies 2.3 km to the south of this area.</li> <li>· Given the proximity of this site to the line of the Roman Road, there is a high likelihood of important archaeological remains in this area some of which may, potentially, be of national importance.</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2382	Q190	MJP37	<p>No objection in principle on ecological grounds providing that 'The Dale' and Lylands Wood, which are included in the NCC's provisional Inventory of Ancient Woodland are excluded. Restoration may provide the opportunity to diversify the intensively farmed landscape.</p> <p>The large scale landscape is intensively managed for cereal and root crops. The majority of the hedgerows have been lost leaving the landscape open, there are few individual trees and tree cover is sparse, which makes the landscape sensitive to development. The aim of the area is to resist large scale development, which would bring discord to the landscape pattern. There is limited capacity for change and the landscape is sensitive to development.</p> <p>Object to the development in terms of heritage and design impact as will detrimentally impact on the setting of the workhouse, and will cause the loss of buildings at Moor Farm. The proposal could impact on the setting of listed buildings.</p>
120 English Heritage	0363	Q190	MJP38	<ul style="list-style-type: none"> <li>· This site lies in an area of known archaeological importance containing remains from the Mesolithic, Bronze Age, Roman and Medieval periods.</li> <li>· This eastern edge of this site lies only 300 metres from the southernmost of the Scheduled henges at Thornborough</li> <li>· The Scheduled East Tanfield deserted medieval village lies 370 metres from the south-eastern corner of this site</li> <li>· A Scheduled round barrow lies just over 1 km to the east of this area</li> <li>· The boundary of the West Tanfield Conservation Area (which includes the Grade I Listed Church of St Nicholas and the Marmion Tower) lies less than 770 metres from the western corner of this area.</li> <li>· There is a Grade II Listed Building at Sleningford Mill on the opposite bank of the River Ure less than 135 metres from the southern boundary of this area.</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Scheduled Monuments and other heritage assets in the area. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2383	Q190	MJP39	<p>No objection on ecological grounds in principle but the River Ure is a regionally important Green Infrastructure corridor of outstanding ecological value. Any quarrying of this site, which lies within the floodplain, would have to respect the ecology and hydrology of the river with a significant buffer zone. Restoration would need to avoid provision of cold deep water in favour of restoration to shallow wetlands capable of ecological resilience to flooding.</p> <p>In terms of landscape the area occupies the broad flat corridor of the River Ure and is important to the landscape setting of West Tanfield and approach to the village from the south over Tanfield Bridge. The aim in the area is also to protect key views of the Marmion Tower. Any inappropriate development of an extensive scale would not be supported in this area. The Ripon Rowel Walk also borders the site where it passes along the river corridor and development of this site would be strongly resisted since it would impact on views along the river corridor.</p> <p>Object in terms of heritage impact as would detrimentally affect the setting of the historic buildings of West Tanfield.</p>
120 English Heritage	0364	Q190	MJP39	<ul style="list-style-type: none"> <li>· This site lies in an area of known archaeological importance containing remains from the Mesolithic Bronze Age, Roman and Medieval periods.</li> <li>· The boundary of West Tanfield Conservation Area (which includes the Grade I Listed Church of St Nicholas and the Marmion Tower) lies on the opposite bank of the River Ure</li> <li>· Tanfield Bridge adjacent to the western edge of this site is a Scheduled Monument and Grade II Listed Building.</li> <li>· This site lies only 950 metres from the Scheduled Thornborough Henges.</li> <li>· East Tanfield deserted mediaeval village lies 1.2 km to the south-east of this site</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Scheduled Monuments and other heritage assets in the area. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0365	Q190	MJP40	<ul style="list-style-type: none"> <li>· There is a group of Listed Buildings lying less than 200 metres to the south of this area including the Grade II* Listed Scotton Old Hall</li> <li>· There are a number of Grade II Listed Buildings at Brearton 500 metres to the north of this site.</li> <li>· The boundary of Farnham Conservation Area (which includes the Grade I Listed Church of St Oswald) lies 1.5 km to the east of this site</li> <li>· The boundary of Scriven Conservation Area (which includes the Grade II* Listed Home Farmhouse) lies 1.9 km to the south-east of this site</li> </ul>
330 Harrogate Borough Council	2384	Q190	MJP40	<p>No objections on ecological grounds but opportunities for restoration of BAP priority habitats should be sought, following a comprehensive survey, particularly in view of the proximity of Farnham Mires SSSI. The SSSI appears to be a remnant of a much more extensive area of mires which almost stretched as far east as this site at this site at the time of the first edition OS maps in mid C19th, linking into Brearton Moor.</p> <p>In terms of landscape the trees help to integrate the settlement with the landscape and are important features in the area plus parkland trees within the grounds of Nidd Hall. Nidd Hall and its associated parkland is important to the landscape character of the area and should be protected and the area also provides a setting for Ripley Park, which is a registered park and garden. There is limited capacity for change and the landscape is very sensitive to development.</p> <p>Object to loss of tranquillity to Quaker burial ground in terms of heritage and design impact.</p>
2197 CPRE (Harrogate)	1158	Q190	MJP40	Smaller version of previous submission, poor road network, mineral may be difficult to quarry due to overburden. Site has been discounted in the past.
1100 Aggregate Industries	0484	Q190	MJP40	Supports proposed working of Sand and Gravel at the site.
2197 CPRE (Harrogate)	1159	Q190	MJP41	Close to a farm but not near a village, good access to SNR. Unsure of restoration proposal but suggest a sustainable land use.

Respondent Number/Name                      CommentNo   Paragraph   Sites                      Comment

330 Harrogate Borough Council                      2385                      Q190                      MJP41                      No objections in principle on ecological grounds, but the River Nidd is a regionally important Green Infrastructure Corridor of outstanding ecological value. Any quarrying of this site, which lies in a floodplain would have to respect the ecology and hydrology of the river with a sufficient buffer zone. Restoration would need to avoid provision of cold deep water in favour of restoration to shallow wetlands capable of ecological resilience to flooding. However there may be the opportunity to diversify part of the river corridor which is currently subject to intensive arable farming.

In terms of landscape impact the site lies in the flood plain of the River Nidd where the sloping valley sides are sparsely wooded. The river corridor is already impacted upon by the southern bypass and the area is narrow and could disappear altogether if intensive arable use and development is allowed to encroach on the river corridor. Development would not be supported in this area in order to conserve and enhance the distinctive character of the river corridor.

61 National Grid Gas and                      0117                      Q190                      MJP41                      The site is crossed by PHG overhead line, Knaresborough to Monk Fryston. Potential operators of the site should be aware of the National Grid policy to seek to retain existing overhead lines in-situ.

120 English Heritage                      0366                      Q190                      MJP41                      · This site lies just under 850 metres from the western edge of the Grade II Historic Park and Garden at Ribston Hall. This landscape includes the Grade II\* Listed Ribston Hall, the Chapel of St Andrew, and the stables to the north of the Hall.  
 · This site lies 1.7 km from the eastern edge of the Grade II\* Historic Park and Garden at Plompton Rocks. This landscape includes the Grade II\* Listed Plompton Hall and its stables  
 · The boundary of Plompton Conservation Area (which includes the Grade II\* Listed Plompton Hall and its stables) lies 1.6 km to the south-west of this area.  
 · The boundary of Goldsborough Conservation Area (which includes the Grade II\* Listed Goldsborough Hall) lies 620 metres to the east of this area  
 · The southern edge of Knaresborough Conservation Area lies 970 metres to the north-west of this area

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0367	Q190	MJP42	<ul style="list-style-type: none"> <li>· The eastern edge of this site lies 560 metres from the Scheduled Maiden Bower and Cock Lodge (a Norman motte and bailey castle, moated site, windmill mound and associated linear outwork).</li> <li>· A Scheduled Medieval moated site, fishponds and associated field system is situated 1.1 km to the east of this area.</li> <li>· The boundary of Topcliffe Conservation Area, which contains a number of Listed Buildings including the Grade II* Listed Church of St Columba, lies 950 metres to the north of this area.</li> <li>· There are a number of Listed Buildings in the villages of Asenby (400 metres to the north) and Dishforth (2 km to the south-west).</li> </ul>
2197 CPRE (Harrogate)	1160	Q190	MJP42	Smaller version of previous application, relatively good road access, restoration should be a sustainable land use
112 Highways Agency	0455	Q190	MJP42	Site adjacent to A168, traffic impact will need to be considered
330 Harrogate Borough Council	2386	Q190	MJP42	<p>No objections on ecological grounds but opportunities for restoration of BAP priority habitats should be sought, particularly in view of the proximity of the nationally important historical botanical site at Leckby Carr, just to the east of the site. Leckby Carr was a raised bog lost to agricultural improvements and forestry in the C19th and C20th.</p> <p>Impacts on landscape setting of River Swale corridor would raise significant concerns in this area. Clumps of woodland which frame the narrow flat corridor are important since they enclose the riverside and channel views. The area can be viewed from crossing points over the river and these viewpoints should be protected. Many footpaths cross the site and since there are so few footpaths providing access to the riverside these paths are important in providing access for recreation to the riverside area and should be retained. Development which would result in increased traffic movements, which could change the peaceful character of the landscape, would not be supported. There is limited capacity for change and the area is sensitive to development. Baldersby park is an important feature in the area and the setting of the park includes the River Swale corridor. Development would not be supported in this area in order to conserve and enhance the distinctive character of the river corridor.</p>



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2836 ***consulted under 2385****	0152	Q190	MJP43	Object to the site Land West of Scruton. It would kill the village of Scruton and have a traumatic affect on the residents, especially the elderly ones. Scruton is a quiet peaceful village surrounded by open fields, pathways and beautiful clean countryside and any proposed development would turn it into a dirty, noisy, dusty place to live as it would sit in the direct line of where the dust and dirt generated would be deposited. There are narrow roads that do not have footpaths, but it is currently safe to walk on the roads, if the site went ahead this would become hazardous.
2835	0151	Q190	MJP43	Object to the site Land West of Scruton. This would have a very detrimental affect on health and safety. The amount of dust and dirt generated would make life almost unbearable. Our roads are very narrow, it is difficult in places for two cars, so it would be impossible for wagons. There are almost no paths for people to use so unable to avoid the lorries. Scruton as a well regarded country village would disappear and become a 'dead' area. The countryside would die and wildlife would be non-existent. The peace and quiet would disappear. The prevailing wind is towards the village so the dirt, dust and noise would come inside our homes.
2901	0651	Q190	MJP43	Strongly objects to the site, due to: cumulative impact of numerous developments (e.g. Leeming bar Industrial Estate, A1 Upgrade, Bedale Bypass, Lorry Park); out of character with rural nature of the area; loss of good quality agricultural land; negative impact upon watercourses which run through the site; noise and dust pollution leading to a reduction in the air quality; vibration from workings; proximity to the village; damage to an ancient battleground (Battle of Scruton Moor); damage to wildlife and woodland habitat; inadequate local road network for heavy vehicles; impact upon the designated cycle route on Low Street; impact upon high voltage power lines running through the site.
2904	0652	Q190	MJP43	Objects to the site, due to: proximity to residential buildings; loss of Grade 2 Agricultural Land; effect upon quality of life for local residents; dust pollution; impact upon the landscape and tourism.
2895	0653	Q190	MJP43	Objects to the site, due to: unproven need for the site; impact upon residential properties; detrimental impact upon quality of life for nearby residents; noise and dust pollution; businesses sensitive to dust pollution are important to the local economy (food production units in Leeming Bar); visual impact due to prominence of the site; loss of high quality agricultural land, woodland and wildlife habitats.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment	
2897	0654	Q190	MJP43	Strongly objects to the site, due to: development on greenfield land; proximity to residential buildings; environmental pollution; development out of character with the rural setting; no timeframe for the site provided; noise and potential light pollution; water management issues; instability of the ground in the surrounding area; the area has a high water table which if altered can have impacts upon properties and could lead to subsidence; alterations to local water courses could lead to potential flooding.	
2898	****Consulted under 2897****	0655	Q190	MJP43	Strongly objects to the site, due to: development on greenfield land; proximity to residential properties; air, light and noise pollution; health risks from increased traffic; impact upon local housing prices; damage to wildlife; impact upon landscape; no timescales provided; impacts upon watercourses.
2899	0656	Q190	MJP43	Objects to the site, due to; Leeming Bar has expanded beyond its capacity; no consultation undertaken.	
2900	0657	Q190	MJP43	Objects to the site, due to: dust and noise pollution; impacts upon local road network from heavy vehicles leading to dangerous conditions to walk or cycle.	
2837	0153	Q190	MJP43	Object to the site. There would be an increase in the noise pollution we already experience from RAF Leeming. The A1 is due to be upgraded and this will generate dirt, dust and noise and increased HGVs, this site would add to this. The increase of HGVs on the narrow lanes would cause problems for walkers and horse riders as there are very few footpaths. Concerned about the impact of dust on the health of residents especially those living near the quarry and on the HGV routes. The quarry will discourage visitors and people from using the renovated Scruton Station.	
2896	0650	Q190	MJP43	Strongly object to the site, due to: loss of prime agricultural land, woodlands and watercourses; noise and dust pollution; effect upon the local water table; impact from heavy vehicles upon the local road network; lack of Environmental and Economic assessments of the proposal; restrictions on restoration options.	
2839	0177	Q190	MJP43	Objects to the site. Concerned about the impacts on local businesses, residents, wildlife and tourism and the combined impacts with other developments (the By-pass, expansion of Leeming Bar Industrial estate).	
2893	0587	Q190	MJP43	Concerned about the adverse impacts of the quarrying activities on local life and traffic impacts upon inadequate county roads.	
2935	0585	Q190	MJP43	Objects to site at Roughley Bank.	

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2891	0589	Q190	MJP43	<p>Object to the site of the following grounds: destruction of important environmental land, valued habitats for wildlife and eco system.</p> <p>Potential for the quarry to cause drainage problems and flooding problems. Potential for pollution of the site and local water table.</p> <p>Concerned about traffic impacts.</p> <p>Concerned about the impact on house prices.</p>
2784	0252	Q190	MJP43	<p>Objects to the site due to proximity to residential properties and the impact the site would have on property prices. Concerned about the impact upon health and quality of life. The site comprises prime agricultural land and natural woodland that would be destroyed. The site would impact upon tourism in the area and local business which depend upon the tourism industry.</p> <p>Considers there to be sufficient existing quarries with applications for extensions that can provide adequate mineral without developing a new site.</p> <p>There are properties within the site that are not owned by the land owner submitting the site. Consent has not been given by the property owners.</p>
2890	0590	Q190	MJP43	<p>Object to the site on the following grounds: The site includes areas on agricultural land and woodland and proximity residential areas. The site is being considered against 7 other sand and gravel site submissions which already have safe access and would be more suitable. Concerned about pollution, health problems and traffic impacts.</p>
2962	0597	Q190	MJP43	<p>Strongly objects to the site, due to: proximity to residential properties; out of character with the rural setting; noise and dust pollution leading to potential health risks; impact upon local road network and the increase in hazards; loss of public paths and bridleways; damage to tourism; negative impact upon residential property values.</p>
2963	0609	Q190	MJP43	<p>***if sending by post consulted under 2784)</p> <p>Objects to the site, due to: Proximity to residential properties; noise and dust pollution; impact on local road network from HGVs; negative impact upon paths and bridleways (including a National Cycle Route); impact upon watercourse and woodland; loss of prime agricultural land; damage to the landscape; loss of the ridge west of Low Street currently defending the village from high winds; potential for water areas restoration is limited due to birdstrike risk from RAF Leeming; Viability of the site not proved; no need for this site due to other submitted areas being more suitable.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2912	0608	Q190	MJP43	Strongly objects to the site, due to: loss of prime agricultural land and habitats for wildlife including deer and fish; loss of paths and bridleways; noise and dust pollution; negative impact upon local house prices.
2903	0607	Q190	MJP43	Strongly objects to the site, due to: negative environmental impacts; impact upon the unsuitable local road network and associated hazards; dust and noise pollution and resultant health risks.
2894	0606	Q190	MJP43	Objects to the site, due to: impact upon local road network and potential increased risk of accidents; impacts upon footpaths; environmental and landscape impacts.
2847	0182	Q190	MJP43	There has been an increase in commercial activities in the area over the past few years which has resulted in increased noise, vehicle activity and substantial amounts of dirt and dust. There has been a reduction in the availability of prime agricultural land. The proposed quarry will destroy wildlife habitats, affect water courses, prevent public access to footpaths and bridleways and scar an area of natural beauty. The availability of arable land will be decreased and the volume of lorries will increase and increase noise dust and dirt.
2940	0605	Q190	MJP43	Strongly objects to the site, due to: noise and dust pollution; impact upon unsuitable local road network; proximity to residential properties; size of the site is out of character with the rural nature of the area; effect upon quality of life of local residents; loss of Grade 2 Agricultural Land and ancient woodland.
2958	0638	Q190	MJP43	Strongly objects to the site, due to: proximity to properties; wellbeing of local residents will be at risk; noise pollution from activities at the site and associated traffic with potential health risks.  Assurances by an independent medical authority need to be given that it will not be a risk to health of local residents. Need for this site needs to be provided. An independent environmental assessment needs to be undertaken which will assess wind conditions, water table impact, contaminant and run-off.
2877	0461	Q190	MJP43	Objects to the site. Concerned about property prices and the quality of life for residents of the village.  A further objection was made 28/3/14.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2838	0154	Q190	MJP43	Object to the proposed quarry. The proposal would cause misery for the villagers due to noise, dust and traffic pollution. The roads around the site are not suitable for the large lorries which would have to use the site. The loss of bridleways and footpaths would also detract from the amenities of the area. There are several areas of woodland and water courses that would be destroyed which would affect the wildlife in the area.
2845	0176	Q190	MJP43	Object to the site. The details submitted are rather ambiguous and expresses concern over the outcome.
2941	0604	Q190	MJP43	Objects to the site, due to: damage to the environment including habitats for wildlife and the landscape; potential impact upon the water table and structure of land underneath properties; negative impact upon local property values and quality of life.
2939	0603	Q190	MJP43	Strongly objects to the site, due to: noise and dust pollution; impact upon unsuitable local road network; proximity to residential properties; size of the site is out of character with the rural nature of the area; effect upon quality of life of local residents; loss of Grade 2 Agricultural Land and ancient woodland.
2961	0631	Q190	MJP43	Objects to the site, due to: loss of agricultural land and landscape; unsuitable local road network; noise and dust pollution; negative impact upon local house prices.
2960	0640	Q190	MJP43	Objects to the site, due to; loss of agricultural land, woodland, water courses, habitats for wildlife, the landscape and public footpaths; noise and dust pollution; traffic disruptions and additional hazards.
2829	0118	Q190	MJP43	Appalled by the proposal as it will spoil the countryside. Concerned about the disruption caused by HGVs and machinery on narrow country roads.
2957	0637	Q190	MJP43	Objects to the site, due to: noise and dust pollution and potential health risks; impact of additional traffic on the local road network; cumulative effect of other development; loss of prime agricultural land, woodland, watercourses and natural habitats for wildlife; damage to tourism.
2902	0658	Q190	MJP43	Strongly object to the site, due to: cumulative impact from numerous developments; out of character with the rural setting.
2959	0639	Q190	MJP43	Objects to the site, due to: not in keeping with the rural character; cumulative impact of numerous developments; loss of agricultural land, local paths and bridleways; noise pollution; increase in traffic on an unsuitable local road network; increased risk of flooding; damage to local habitats of wildlife (e.g. deer, cuckoos and woodpeckers); need not established; damage to quality of life for local residents; negative impact on local house prices.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2888	0648	Q190	MJP43	Objects to the site, due to: cumulative impact of numerous developments, including a HGV stop and a large industrial estate.
2889	0649	Q190	MJP43	Objects to the site, due to: noise and dust pollution; impacts from heavy traffic on an unsuitable local road network; loss or downgrading of Grade 2 Agricultural Land; impact upon quality of life for local residents; damage to landscape.
112 Highways Agency	0456	Q190	MJP43	Site adjacent to A1(M), traffic impact on junction 51 will need to be assessed
2215 CPRE (Hambleton Branch)	0181	Q190	MJP43	The respondent has been informed that test drilling has not been carried out on all land submitted. The 100 acres in the centre of the site (around Moor House Farm) has not been drilled. In the areas which have been drilled the tests revealed that 2m of gravel on top of clay. If this is the case it appears to be minor amounts to justify the loss of good agricultural land, ancient hedgerows and woodland.
3017	0816	Q190	MJP43	Objects to the site, due to: impact of transporting the extracted minerals; noise and dust pollution from site and transport; impact upon the water table potentially leading to subsidence and damage to buildings; loss of amenity for local residents; reduction in property values; loss of agricultural land; unclear restoration proposals.
2822	0101	Q190	MJP43	Objects to the site for the following reasons: The sites is on prime agricultural land. The area has a high water table and is prone to flooding. The sand and gravel help drainage of the area, if it were extracted the area would have a greater risk of flooding. There would be a loss of very old woodland and natural habitats. The existing road network is inadequate to cope with large vehicles. Concern about subsidence of local properties. Concern about the impact upon local communities and residential amenity including as a result of pollution brought into the village on the prevailing westerly winds.
2821	0100	Q190	MJP43	Considers there are sufficient sites already in the Bedale and Leyburn area and there is no need for anymore. The site would impact upon wildlife and the beauty of the area. Concerned about the impact upon the local amenity of the area including the local church and pub and the local businesses.
2820	0099	Q190	MJP43	Objects to the inclusion of the site in the MWJP on the following grounds: Loss of woodland and increased noise and dust which will be brought into the village as a result. Proximity and impact on residential properties. Impact and loss of residential amenity.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment	
2819	0098	Q190	MJP43	The proposal would be a tragedy to the beautiful countryside and rural community. The road infrastructure network is not fit for purpose and suitable only for minimal traffic.	
2975	0859	Q190	MJP43	Objects to the site, due to: loss of the natural landscape, habitats for wildlife and flora and fauna; development not in keeping with the rural character; damage to peoples views; impact upon groundwater and land stability; negative impact upon quality of life; loss of good quality agricultural land; noise, dust and traffic pollution; impact upon local road network and paths; road safety concerns; the benefit of extracting the mineral does not justify the negative impacts.	
2817	0090	Q190	MJP43	Object to the progression of the site as it will destroy the area.	
2977	0860	Q190	MJP43	Strongly objects to the site, due to: loss of prime agricultural land; dust pollution.	
2983	0704	Q190	MJP43	Objects to the site, due to: proximity to the village and residents; out of character with the rural nature of the area; unsuitable local road network for heavy vehicles; increase in traffic; noise, dust and visual pollution.	
2830	0120	Q190	MJP43	Objects to the proposal of the site. Concerns include the cumulative impact the proposal would have in combination with the Industrial estate, by-pass and A1 upgrade. Concerned about the effect of the quality of life of local residents and the future of the Wensleydale Railway.	
3016	0815	Q190	MJP43	Objects to the site due to: the future need for these minerals has yet to be determined, therefore the need for this site is uncertain; loss of good quality agricultural land; the site is fragmented; the site in total would have a significant impact; other sites are more suitable (e.g. closer to the River Swale both to the north and south of the A684).  If the site at Killerby does not provide the local areas needs, a small area within the centre of the site between Ham Hall Lane and Low Street may be suitable.	
2825	0106	Q190	MJP43	Objects to the site due to concern over impact upon local residents and local businesses and wildlife including loss of habitats impacts upon bridal ways and footpaths.	
2814	Scruton Quarry Action Group	0075	Q190	MJP43	Objects to the proposal due to the proximity with Scruton Village, residential properties and equestrian businesses and local access roads. The site covers prime agricultural land and some natural woodland that would be destroyed.  The group objects to the over industrialisation of the area as a result of past expansions to Leeming Bar industrial estate and bypass.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
3015	0810	Q190	MJP43	Strongly objects to the site, due to: increase in traffic on an unsuitable local road network; cumulative impact of numerous developments; impact upon local vegetation; noise and traffic pollution; quality of life of residents; negative impact upon property values.
2984 ***if postal consulted under 2822***	0705	Q190	MJP43	Strongly objects to the site, due to: loss of prime agricultural land; dust and noise pollution; groundwater contamination; loss of landscape and woodlands which provide habitats for local wildlife (including deer); damage to the environment and quality of life; impact upon paths and bridleways; reduction in property values; unsuitable local road network for heavy vehicles potentially leading to safety and congestion concerns.
1505	0783	Q190	MJP43	Question of need has to be addressed. The large area envelops houses, woodland and grade 2 arable land. It will have a detrimental effect on residents in 3 parishes, Leeming, Scruton and Kirkby Fleetham with Fencote.
2985	0706	Q190	MJP43	Objects to the site, due to: proximity to the village; size of the site in relation to Scruton; negative impact upon quality of life and tourism (including Wensleydale Railway); dust and noise pollution; damage to the landscape; loss of prime agricultural land and woodlands.
2996 Scruton Playing Fields Association	0778	Q190	MJP43	Concerned about the site, due to: significant negative impact upon the playing fields and wider village community; impact of increased traffic on Station Lane; dust and noise pollution affecting the condition of play equipment and user enjoyment of the playing fields; proximity to the playing fields.
3002	0779	Q190	MJP43	Objects to the site, due to: increased traffic; dust pollution; negative impact upon house prices.
2999	0780	Q190	MJP43	Strongly objects to the site, due to: out of character with the rural nature of the area; increased traffic and noise pollution; negative impact upon the water table and potential flooding problems.
3010	0742	Q190	MJP43	Objects to the site, due to: loss of good quality agricultural land; no need for a new site as others existing sites are available for expansion; dust pollution leading to health problems; unsuitable local road network for heavy vehicles; increase in traffic; unclear if the development will benefit the area economically.
2976	0861	Q190	MJP43	Objects to the site.
2832	0119	Q190	MJP43	Concerned about the direct and indirect impact upon residential properties, including the saleability of properties. Considers the site to be a prime leisure and tourism opportunity providing rail, cycle and bridleways and habitats crossing the site.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment	
2923	0660	Q190	MJP43	Objects to the site, due to: impact upon quality of life and air pollution	
2928	0664	Q190	MJP43	Strongly objects to the site, due to: Impact upon health of local residents.	
2924	0661	Q190	MJP43	Objects to the site, due to: loss of prime agricultural land; cumulative impacts of numerous developments; loss of paths and bridleways.	
2926	0662	Q190	MJP43	Strongly objects to the site, due to: impact upon property values; unsuitable local road network; impact upon quality of life.	
2927	0663	Q190	MJP43	Strongly objects to the site, due to: impact upon property values; unsuitable local road network; impact upon quality of life.	
2929	***consulted under 2848***	0665	Q190	MJP43	Objects to the site, due to: impact upon local road network; air pollution; impact upon tourism and loss of local wildlife.
2979	0669	Q190	MJP43	Objects to the site, due to: negative effect upon quality of life; impact of additional traffic on the local road network; noise and dust pollution; loss of landscape and paths; negative impact upon house values.	
2978	0670	Q190	MJP43	Objects to the site, due to: loss of prime agricultural land; unsuitable local road network for heavy vehicles.	
2834	0094	Q190	MJP43	Object to the site for the following reasons; proximity to residential properties, destruction of woodland, prime agricultural land and loss of wildlife.	
2974	0674	Q190	MJP43	Objects to the site, due to: loss of grade 2 agricultural land which currently provides much needed land for food production; no need for new sand and gravel sites due to capacity available at existing sites.	
2831	0122	Q190	MJP43	Strongly objects to the proposal for the following reasons: - the proximity of the site to residential properties and the potential for pollution (from transport and machinery). -impact of traffic on the narrow county roads. Concerned about the potential for subsidence of properties adjoining the site. -destruction of habitats and agricultural land -impact upon local amenity including health and well-being of local residents and tourism of the area -pollution of water	
2826	0105	Q190	MJP43	Objects to the site and supports the justification provided by the Scruton Quarry Action Group.	

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment	
2828	0121	Q190	MJP43	We are strongly opposed to the proposals for extraction on the site because it will cause destruction of the existing rural environment and loss of prime agricultural land, there will be a rise in dust and noise into the village, the amount of HGV transport will increase, there will be an adverse impact on the environment and local amenity.	
2936	0584	Q190	MJP43	Oppose the site. Will cause extra traffic and dust. There will be a loss of agricultural land and local footpaths.	
2844	0178	Q190	MJP43	Object to this proposal. Concerned about the amount of noise and dust which would be generated, the prevailing wind would carry the dust towards the village, The roads are too narrow to support the constant heavy traffic a quarry would generate. The footpath which crosses the proposed development would be lost and there would be an adverse impact on wildlife. The quarry would affect the house prices in the area. There has not been much detail provided about the proposal and the views of and impact on the villagers have not been taken into consideration.	
2972	0671	Q190	MJP43	Objects to the site, due to: reduction in quality of life for local residents leading to people leaving the village; unsuitable local road network for heavy vehicles; increase in traffic; dust pollution leading to health problems; proximity to village residents.	
2971	***if sending by post consult under 2946**	0672	Q190	MJP43	Objects to the site, due to: proximity to residents; negative impact upon house prices, quality of life and health; loss of landscape and habitats supporting wildlife.
2827	0110	Q190	MJP43	Objects to the inclusion of the site in the MWJP. Concerned about the impact upon Scruton village, loss of amenity and the impact upon quality of life for the local residents including health risks from emissions, land contamination, noise pollution, water pollution and visual intrusion. The risks for the older residents may include respiratory, pulmonary and cardiac health problems. Additional concerns include increased traffic within the village and local narrow roads. Considers people may be driven out by the development if it were to go ahead. The lives of the residents who are surrounded and abut the site many become intolerable.  Considers there are other more appropriate sites which will impact upon fewer residents.	
2215	CPRE (Hambleton Branch)	0109	Q190	MJP43	The site is significantly the largest proposal on undeveloped land. Residential properties, including designated properties, are shown to be completely surrounded, or abut the proposal boundary. Considers the proposal would diminish the quality of life for local residents. There would be a loss of good agricultural land and ancient woodland.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2973	0673	Q190	MJP43	Objects to the site, due to: cumulative effect of numerous developments (A1 improvement, by-pass); increased traffic; noise, light and traffic pollution; negative impact upon quality of life; reduction in house prices.
2922	0659	Q190	MJP43	Objects to the site, due to: noise pollution; impact of heavy traffic on an unsuitable local road network; loss of productive agricultural land and wildlife habitats; damage local tourism; loss of footpaths, bridleways and woodland; impact upon the landscape.
2833	0093	Q190	MJP43	Objects to the site as the site is prime agricultural land and provides habitats for wildlife and beautiful scenery which is enjoyed when walking and cycling. Concerned about the impact upon the peaceful village of Scruton and increased volumes of traffic, dust and safety hazards.
2906	0557	Q190	MJP43	Strongly objects to the site, due to: damage to the rural character of the local area; loss of agricultural land and the habitat which supports wildlife; negative impact upon local house prices and the landscape of the area.
2853	0276	Q190	MJP43	<p>Part of the site will have the Bedale bypass going over it and an application for a borrow pit is also contained within the site area, but not mentioned in the submission. The site area is crossed by 2 public highways which are narrow country lanes used by walkers, cyclists, horse riders as well as other traffic. The site is crossed by a bridleway, contains watercourses, woodland which define the landscape character and is largely agricultural land. The site is close to housing.</p> <p>There is not enough detail or evidence provided about the proposal or mineral working for this site. Available resource evidence does not support the allocation of this site and there is no need for the mineral from this site. The site is unlikely to offer an economic or workable mineral extraction and restoration scheme. There could be water areas and loss of agricultural land during restoration which could cause a bird strike hazard for RAF Leeming.</p> <p>The visual amenity of the area would be adversely impacted and the site would be visible from surrounding highways.</p> <p>The noise and dust generated during the working of the site would be intrusive to residents, visitors and highway users.</p> <p>The landscape and wildlife would be adversely affected, woodland would be lost and water courses altered.</p> <p>The quarry traffic will have to use the narrow country lanes. The amenity of the local area would be affected.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2852	0275	Q190	MJP43	<p>Object to proposed quarry between Leeming Bar and Scruton. The road infrastructure in surrounding area will not cope with larger vehicles and the increase in the volume of traffic.</p> <p>It will conflict with the proposed Bedale Bypass and the borrow pit being used to accommodate the construction.</p> <p>The area provides an alternative route for traffic when the river floods at Morton on Swale, as it struggles to take the larger vehicles.</p> <p>The site will alter the water table for the area.</p> <p>It will add to the upheaval which has already occurred in the area due to the A1 upgrade and is due to start for the Bedale bypass.</p> <p>There is no alternative route to take traffic away from populated areas.</p>
2851	0274	Q190	MJP43	<p>Object to planned quarry development in Scruton/Leeming Bar area. There is enough development going on in the area at the moment and it will impact on the open landscape. There does not appear to be any information about how the site will be restored.</p>
2887	0559	Q190	MJP43	<p>Strongly objects to the site due to: effect upon business which is highly sensitive to nearby noises and dependent upon the current rural character; noise, safety, air pollution and local transport impacts. The current road network would not be able to support heavy vehicles and would require improvement prior to any working at the site. Impact upon the local landscape.</p>
2850	0273	Q190	MJP43	<p>Objection to site.</p>
2846	0175	Q190	MJP43	<p>Objects to the site on the following grounds:</p> <ul style="list-style-type: none"> <li>- The site is too close to the village and outlying properties, and if approved, the value/saleability of the properties will be affected.</li> <li>- impact upon the quality of life of residents.</li> <li>- Risk to health due to noise, dust and traffic.</li> <li>- loss of good agricultural land</li> <li>- loss of high valued recreational, environmental and ecological land</li> <li>- The combined effects of the development with the By-pass, Industrial estate and RAF Catterick and Leeming.</li> </ul> <p>Consider alternative areas where mineral extraction would be less intrusive.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2848	0222	Q190	MJP43	<p>Strongly objects to the site. Leeming Bar has had enough development and the prospect of years of noise, dust and general upheaval is not a good one. New houses are being built in Leeming, this site will put buyers off.</p> <p>The site would leave permanent scarring in a beautiful valley and should not be considered.</p>
2933	0583	Q190	MJP43	<p>Oppose site west of Scruton. Would lead to loss of agricultural land, would impact on local amenity for residents, increase in heavy lorries on the road, impact on local wildlife and environment and leisure, could impact on the water table. There are other more suitable sites available.</p>
2858	0407	Q190	MJP43	<p>Strongly objects to the site on the following grounds:</p> <ul style="list-style-type: none"> <li>- Questions the need for the site and that any commercial gain would outweigh the disadvantage to the local community.</li> <li>- Adverse impact upon local atmosphere, including airborne dust.</li> <li>- Increase in heavy traffic, impacts upon the environment and health and safety concerns.</li> <li>- Detrimental impact upon local leisure activities, including walking, cycling and horse riding.</li> </ul>
2907	0556	Q190	MJP43	<p>Objects to the site, due to: impact upon the rural character of the area; loss of agricultural land; loss of wildlife habitat; air pollution from dust; and, traffic impacts upon the village; all leading to a reduction in the quality of life of local people.</p>
2908	0555	Q190	MJP43	<p>Objects to the site, due to: impact upon the unsuitable local road network and potential resultant safety concerns; noise and dust pollution leading to health concerns; effect upon local path network; impact upon local environment; and the loss of productive agricultural land.</p>
2909	0554	Q190	MJP43	<p>Objects to the site, due to: serious environmental impacts; other sources are available which will have far less impact; Air and noise pollution; impact upon the unsuitable local road network; impact upon the landscape of the area and resultant negative impact upon local tourism.</p>
2916	0552	Q190	MJP43	<p>Objects to the site, due to: impact upon adjacent residential properties; noise and air pollution; impact upon local road network from HGVs.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2910 ***Consulted Under 2909****	0553	Q190	MJP43	Strongly Objects to the site, due to: Impact upon local people considerably; ruin the local character of the area; loss of woodland and prime agricultural land; loss of public footpaths and bridleways; air pollution from windswept dust potentially affecting the village; noise pollution; Impact upon the local water table; unsuitability of the local road network to support long term use by HGVs; and the availability of sufficient sand and gravel from other sources.
120 English Heritage	0368	Q190	MJP43	<ul style="list-style-type: none"> <li>· A Grade II Listed Ice House lies less than 25 metres from the westernmost edge of this site.</li> <li>· Leases Hall, a Grade II Listed Building, lies under 250 metres from the western edge of this area.</li> <li>· There is an unscheduled upstanding round barrow between Leases Hall and the Ice House some 200 metres from the western edge of this area.</li> <li>· The boundary of Scruton Conservation Area (which contains a number of Listed Buildings including the Grade II* Listed Church of St Radegund) lies only 350 metres from the eastern corner of this site</li> <li>· A Scheduled Motte and bailey castle and medieval settlement earthworks within Hall Garth lie 1.4 km from the northern edge of this site</li> <li>· The boundary of Kirkby Fleetham Conservation Area lies 1.5 km to the north of this site</li> <li>· Scruton Grange, a Grade II Listed Building, is situated less than 40 metres from the eastern edge of this site</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2842	0256	Q190	MJP43	<p>The proposal for Scruton seems speculative and not adequately formed, there are no estimates of the annual output, the estimated reserve is the largest of the speculative proposals, there is not estimate for waste, no estimate for the life of the site and no indication plans for restoration or aftercare. The proposal seems to involve the largest adverse impact of any of the proposals. Some houses are surrounded or directly bordered by the site and some covered by the site, would these need to be demolished. It is the largest proposal and would profoundly diminish the quality of life for all who live in the area.</p> <p>The area has a high water table, any significant extraction may have an adverse affect. There are overland electricity wires which would have to be moved extraction took place.</p> <p>The site would cause a lot of dust which could cause problem for the aircraft from RAF Leeming.</p> <p>The site would have an environmental impact, the prime agricultural land and wildlife habitats would disappear.</p> <p>It could impact the local fishery.</p> <p>The development could encroach onto the recently restored Wensleydale railway line. There would be an increase in noise, dust and emissions along with an increase in traffic. The dust could impact on the health of residents. House prices would be affected.</p>
2915	0551	Q190	MJP43	<p>Strongly Objects to the site, due to: traffic impacts and impact upon an unsuitable local road network leading to safety concerns; air pollution and dust damage to local development from winds disrupting any dust on the proposed site; effect upon local property values; loss of productive agricultural farmland; damage to the landscape; noise and vibration impacts which could lead to health problems; pollution to the water table impacting upon wildlife in local watercourses.</p>
2884	0505	Q190	MJP43	<p>Strongly objects to the site due to: loss of countryside and impact of continued noise, traffic and dust</p>
2881	0463	Q190	MJP43	<p>Strongly object to the allocation of this site, due to:</p> <ul style="list-style-type: none"> <li>- other suitable, preferable sites, are available</li> <li>- the impact that this site would have upon the local population, in addition to previous mineral workings</li> </ul>
2880	****Consulted under 2863****	Q190	MJP43	<p>Objects to this site for the following reasons; effects of potential dust and noise from the workings on quality of life and the nearby RAF Leeming, in addition to the related heavy traffic movements.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2878	0464	Q190	MJP43	Objects to the allocation of the site due to: impact upon nearby residential properties; impacts of noise and increased heavy traffic; visual impact from the development; air pollution and dust impacts; negative impact upon local tourism and the landscape.
2870	0470	Q190	MJP43	Strongly objects to this site due to; negative effects upon well being of local residents, property values, character of the local villages and the impacts upon the environment
2871 ***Do Not Consult*** Consulted Under 2870***	0471	Q190	MJP43	Strongly objects to this site due to; negative effects upon well being of local residents, property values, character of the local villages and the impacts upon the environment
2869 ***Do Not Consult*** Consulted Under 2868***	0472	Q190	MJP43	Strongly objects to this site due to; negative effects upon well being of local residents, property values, character of the local villages and the impacts upon the environment
2868	0473	Q190	MJP43	Strongly objects to this site due to; negative effects upon well being of local residents, property values, character of the local villages and the impacts upon the environment
2919	0526	Q190	MJP43	Objects to the site on the following grounds: Proximity to residential properties, narrow country lanes, impact upon wildlife habitats, dust and noise.
2879	0465	Q190	MJP43	Strongly objects to the site, due to the detrimental impacts of the development upon local residents, Scruton and the general area.
713 Kirkby Fleetham with Fencote Parish Council	1432	Q190	MJP43	Object due to access problems for HGVs, dust will be a problem and there will be an adverse impact on the landscape.
2885	0504	Q190	MJP43	Objects to the site, due to: negative impact upon the surrounding countryside, local tourism, the environment and the potential for causing health problems.
2886	0503	Q190	MJP43	Strongly object to the site



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment	
2863	0410	Q190	MJP43	<p>Believes the proposal breaches Articles of the European Convention on Human Rights and exposes the Council to lengthy litigation.</p> <p>The Council has a duty of care and a legal responsibility to ensure that safe systems for transport of the Sand and gravel exist. At present the transport infrastructure is inadequate and there would be a need for costly investment to upgrade the network. There are several new housing developments in the area, the proposal will put people off to move to these and the area.</p> <p>Concern about air pollution and health risks which will lead to a need for greater health care services.</p> <p>The site is proposed on agricultural farm land and areas of woodland which would be lost and would have a devastating effect on wildlife, recreation and quality of life for the residents of the area.</p> <p>There are problems in the area with drainage and 'running sand'. There is a subterranean chemical pipeline circumnavigating Scruton area within the proposed site area.</p>	
836	Scruton Parish Council	1541	Q190	MJP43	<p>Strongly object to the proposal due to proximity and impact on residential properties, some properties are completely surrounded and would be adversely affected by noise and dust pollution. The Site would result in a loss of Grade 2 agricultural land and impact on the wellbeing and quality of life of residents. It appears the site would result in the demolition of a number of properties and businesses, woodland, hedgerows and field systems. The road infrastructure is inadequate. There is an electricity substation with overhead power lines which would have to be diverted. The site would impact upon food processing companies at Leeming Bar. There is no adequate restoration plan. There site would add to the impact of recent development in the area (motorway and industrial estate). Photographs have been submitted to accompany the representation.</p>
2861		0478	Q190	MJP43	<p>Strongly objects to the site, due to: negative impacts upon tourism (including the Wensleydale Railway), public rights of way and cycle paths, potential noise and air pollution and heavy traffic on the local road network; In addition to this local wildlife in the waterways and woodlands could be damaged; Potential loss of Roman archaeological artefacts; Potential impact upon the water table and increased chance of subsidence; and finally the impact upon the quality of life of local residents.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2860	0409	Q190	MJP43	Objects to the site due to the destruction of prime agricultural land, woodland, wildlife. Loss of recreational land for horse riding and walking. Concerned about the likely noise and dust pollution and traffic congestion on narrow roads.
2913	0558	Q190	MJP43	Objects to the site, due to: Impact upon the local landscape, wildlife and tourism within the area (linked to the Wensleydale Railway); Impact upon local businesses.
2882	0474	Q190	MJP43	Strongly objects to the site due to; negative effects upon tourism (including the recently restored Scruton Station), the environment and the local area. The site could lead to health issues due to emissions from the site, water/land contamination, noise and visual intrusion.
2918	Wensleydale Railway plc 0586	Q190	MJP43	Concerned about the visual intrusion of the site on the tourist route of the Wensleydale Railway. There would be an increased number of HGV using the level crossings of the line. If the proposal were to go ahead there may be possibility to use the line to move the extracted material which would reduce the impact of the development on the country roads. Concerned about the life of the site and the restoration and after-care.
2948	***Do Not Consult*** Consulted Under 2947*** 0582	Q190	MJP43	Object to the site due to potential impact on residential amenity, loss of agricultural land and cumulative impact of other quarries in the area.
2944	0405	Q190	MJP43	Object to site at Scruton because of the impact it will have on the environmental and residential amenity of the area
3018	1809	Q190	MJP43	Concerned about environmental consequences of this site including <ul style="list-style-type: none"> <li>- loss of agricultural land used for food production</li> <li>- loss of amenities such as walking, horse riding, cycling etc.</li> <li>- rise in noise pollution</li> <li>- increase of HGVs on narrow roads</li> <li>- increased risk of flooding as the water table will be affected</li> <li>- adverse impact on wildlife.</li> </ul> There has been a lack of publicity about the site and many residents will be impacted.
2947	0581	Q190	MJP43	Object to the site. Will impact on the high quality agricultural land. Could reduce effectiveness on windbreak next to the A1 and prevailing wind will carry noise, dust and fumes from the quarry to the village.
2946	0580	Q190	MJP43	Object to the proposed site west of Scruton. Will impact on quality of life of residents and reduce the amount of agricultural land available. Worried about the cumulative impact if other quarries are also allowed in the area.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2945	0579	Q190	MJP43	Object to the site on the grounds of pollution, noise, dust, additional traffic and impact on local amenity
120 English Heritage	0369	Q190	MJP44	· Pollington Hall, a Grade II Listed Building, is situated 1.4 km from the south-eastern corner of this site.
120 English Heritage	0370	Q190	MJP45	· The boundary of Hemingbrough Conservation Area (which contains a number of Listed Buildings including the Grade I Listed Church of St Mary the Virgin) lies 300 metres to the south of this site · Wressle Castle, a Scheduled Monument and Grade I Listed Building, lies 2.8 km to the east of this site · Drax Augustinian Priory, a Scheduled Monument, lies 2.9 km to the south of this site · The Medieval settlement and early post-medieval garden earthworks around Barlow Hall are Scheduled and lie 3.3 km to the south of the western site.
3023 Chas Long & Son (Aggregates) Ltd	2402	Q190	MJP46	Support retention of the site. The company is exploring opportunities for extraction in the area and if go ahead would use the Kiplin site for processing the raw material. The site could be a strategic site for the processing of mineral extracted from satellite and other mineral extraction sites within the local area.
120 English Heritage	0383	Q190	MJP46	· There are a number of Listed Buildings to the north and east of this area the nearest being only 95 metres from the boundary of the site. The Grade I Listed Kiplin Hall lies 300 metres to the east of this site. · There is a Grade II Listed cow byre 140 metres from the southern boundary of this area · A Scheduled Monument (Castle Hills medieval motte and bailey castle, and 20th century airfield defences) lies 1.5 km to the west of this area

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0371	Q190	MJP47	<ul style="list-style-type: none"> <li>· The boundary of Scheduled Monument of Cataractonium Roman forts and town lies 250 metres to the west of this site.</li> <li>· There are a number of Listed Buildings around Catterick Bridge including the Grade II* Listed Catterick Bridge 350 metres to the north of this area</li> <li>· The boundary of Scorton Conservation Area lies 2 km to the east of this site</li> <li>· The boundary of Bolton-on-Swale Conservation Area (which contains a number of Listed Buildings including the Grade II* Listed Church of St Mary and Bolton Old Hall) lies 2 km to the east of this site</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Scheduled Monuments and other heritage assets in the area. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</p>
112 Highways Agency	0457	Q190	MJP47	Site near to proposed Catterick central junction, impact will need to be assessed.
286 Scarborough Borough Council	2399	Q190	MJP49	Object to the allocation of this site. In previous consultation stage in 2008 this site was discounted due to lack of need, potential adverse impact on Cayton and Flixton Carrs wetland project, adverse impact on the Burton Riggs SINC and the network of public rights of way. The SA at the time noted a 'Major Negative ' impact on the Historic Environment and Cultural Heritage and the negative effects on archaeology cannot be effectively mitigated against. These points remain valid.
120 English Heritage	0372	Q190	MJP49	<ul style="list-style-type: none"> <li>· This site lies just 510 metres from the boundary of the Scheduled Monument of the Star Carr Early Mesolithic settlement site.</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of this Scheduled Monument. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</p>
112 Highways Agency	0458	Q190	MJP49	Site adjacent to A64, therefore safety at proposed access and capacity will be a concern.
2759 Wintringham Estate	0827	Q190	MJP50	This site should be identified as a preferred option for sand extraction. The site is not covered by any environmental, ecological or heritage designations. The site is accessible to the strategic highway network and as a result is ideally situated to serve both the northern and southern markets.
112 Highways Agency	0459	Q190	MJP50	Site adjacent to A64, therefore safety at proposed access and capacity will be a concern.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0373	Q190	MJP50	<ul style="list-style-type: none"> <li>· This site lies on the opposite side of the road from the Grade II* Registered Historic Park and Garden at Scampston Hall. This landscape includes the Grade II* Listed Scampston Hall, and the Palladian bridge.</li> <li>· The Grade II Listed Deer Park House lies only 175 metres from the western edge of this area.</li> <li>· The boundary of Wintringham Conservation Area lies 900 metres to the south of this site.</li> <li>· The Grade II Listed Church of St Edmund lies 500 metres from the north-eastern corner of this site.</li> <li>· There is a Scheduled dyke on Knapton Wold 970 metres from the south-eastern corner of this area.</li> <li>· There is a high likelihood of important archaeological remains in this area some of which may, potentially, be of national importance. The Vale of Pickering area exhibits evidence of continuing human habitation and activity from the early prehistoric periods through the Roman period, and up to the present day. The buried prehistoric landscapes and the unique, continuous “ladder” settlements are an extraordinary survival of human activity on a landscape scale, preserved beneath thick sand-blown deposits across the Vale.</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Historic Park and Garden and other heritage assets in the area. The NPPF makes it clear that Grade II* Historic Parks and Gardens are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</p>
116 Ryedale District Council	1209	Q190	MJP50	The potential allocation/ Development of this site would not be supported due to the negative effects on biodiversity interests. The Site contains and is adjacent to SINCs. The potential site is below a secondary conifer plantation and is immediately adjacent to a Historic Park and Garden and the A64 which would need to be adequately screened.
120 English Heritage	0374	Q190	MJP51	<ul style="list-style-type: none"> <li>· This site lies 1 km from the northern boundary of the Grade II* Registered Historic Park and Garden at Newby Hall. This landscape includes the Grade I Listed Newby Hall, and the stables to the north of the house.</li> <li>· The boundary of Bishop Monkton Conservation Area lies 2 km to the south of this site</li> </ul>
2197 CPRE (Harrogate)	1161	Q190	MJP51	Close to a Moat and Medieval Village, site is elevated and visible from Ripon.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
330 Harrogate Borough Council	2387	Q190	MJP51	<p>No objections in principle on ecological grounds but the River Ure is a regionally important Green Infrastructure corridor of outstanding ecological value. Quarrying of this site, which lies within the floodplain, would have to respect the ecology and hydrology of the river with a significant buffer zone. Restoration would need to avoid provision of cold deep water in favour of restoration to shallow wetlands capable of ecological resilience to flooding and providing an ecological restoration component to complement the existing amenity restoration which currently dominates on this side of the river.</p> <p>The creation of a 'green link' between Ripon and Newby Hall, following restoration, using the bridging point, as a cycleway could enhance tourism and enable maximisation of benefits of the canal, river and restoration for wildlife and the economy at Ripon City Quarry.</p> <p>In terms of landscape impact the site lies within the Ure Corridor, which is an area of intense recreational use at the eastern edge of Ripon. A strong network of footpaths provides easy access and the water courses are well wooded providing intimate and attractive settings for boaters and walkers. The area is very sensitive to change and gravel extraction is already a key activity in the area, and the impact of extraction on recreation users is a key issue. The southern extent of this area provides the setting for Newby Hall, a Registered Park and Garden. Development would not be supported in this area in order to conserve and enhance the recreation interests of the river corridor.</p> <p>In terms of Heritage and design impact the site is adjacent the Ripon Ure and Ouse Navigation, an important tourist attraction being the northernmost navigation in England. The footbridge and buildings of Great Givendale are C19th or earlier. The earthworks are considerably older and form an important heritage asset.</p>
120 English Heritage	0375	Q190	MJP52	<p>The boundary of Upper Poppleton Conservation Area, which includes a number of Listed Buildings, lies 1.2 km to the east of this site</p>
61 National Grid Gas and	0115	Q190	MJP53	<p>The site is crossed by high pressure gas pipeline FM07 Pannal to Cawood. Underground pipelines are protected by permanent agreement with landowners or under public highways under licence. There is a requirement that no permanent structures are built over or under pipelines within zone specified, and that no materials or soil are stacked or stored on top of the pipeline route.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0376	Q190	MJP53	<ul style="list-style-type: none"> <li>· This site lies just 360 metres from the northern edge of the Registered Battlefield at Towton.</li> <li>· There are several Listed Buildings around Hazlewood Castle (1.9 km to the west of this area) including the Grade I Listed Hazlewood Castle and the Roman Catholic Chapel of St Leonard.</li> </ul> <p>We have concerns about the impact which mineral extraction from this site might have upon elements which contribute to the significance of the Registered Battlefield at Towton. This is a designated heritage asset which the NPPF has identified as being of the highest significance and where national policy guidance makes it clear that substantial harm or loss should be exceptional.</p>
2760 White Quarry Farm	0823	Q190	MJP53	This site should be identified as a preferred option for extraction of Magnesium limestone. The site is close to areas of demand in Selby, York, Leeds and West Yorkshire.
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1576	Q190	MJP53	The site is located within the green belt and Locally Important Landscape Area, and adjoins a Historic Battlefield site and Nationally Important Wildlife site. The development would cause harm to the openness of the greenbelt and purposes and is likely to harm the character and visual amenity of the area and amenity of nearby residents
120 English Heritage	0377	Q190	MJP54	· There a group of Listed Buildings 1.1 km from the north-western edge of this site. This includes two Grade II* Listed Buildings (The Red House and the Church of St Paul).
120 English Heritage	0378	Q190	MJP55	<ul style="list-style-type: none"> <li>· The boundary of Escrick Conservation Area (which contains a number of Listed Buildings including the Grade II* Listed Escrick Park and Coach House) lies 550 metres to the north-east of this site.</li> <li>· The boundary of the Stillingfleet Conservation Area (which includes the Grade I Listed Church of St Helens) lies 1.7 km to the east of this area.</li> <li>· This site lies some 2.2 km from the Grade II Registered Historic Park and Garden at Moreby Hall. This landscape includes the Grade II* Listed Moreby Hall</li> </ul>
2812 Trans Pennine Trail Office	0727	Q190	MJP55	The current proposal indicates potential use of site(s) adjacent to the Trans Pennine Trail. If the site(s) are progressed we would wish to be represented to ensure the best outcome for improvements/enhancement to our route.
120 English Heritage	0379	Q190	MJP56	<ul style="list-style-type: none"> <li>· There is a group of Grade II Listed Buildings at Byram Hall the closest of which would be 340 metres from the eastern edge of this site</li> <li>· There are two Grade II Listed Buildings at Poole Manor Farm 175 metres from the northern boundary of this site</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0387	Q190	MJP57	<ul style="list-style-type: none"> <li>· There are a number of Listed Buildings to the north and west of this site, the closest being some 900 metres from the boundary of this area.</li> <li>· The Grade II* Listed Stainley Hall lies approximately 1.3 km from the eastern edge of this site</li> </ul>
2197 CPRE (Harrogate)	1162	Q190	MJP57	Only infrastructure site proposed in the Harrogate District. No objection to this valuable resource.
330 Harrogate Borough Council	2389	Q190	MJP57	<p>Concerns have previously been expressed for quarrying from this site regarding visual impact on the AONB, SINCE, loss of field boundaries, ecological impacts, landscape setting of the listed buildings and impact on historic patterns and landscape features.</p> <p>Concerned about impact and screening of grade II listed Friars Hurst.</p>
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1577	Q190	MJP58	The site is located within the green belt and Locally Important Landscape Area, and adjoins a Historic Battlefield site and Nationally Important Wildlife site. The aggregate recycling use would be inappropriate in the green belt and would need to be justified with reference to Very Special Circumstances, The development would cause harm to the openness of the green belt and purposes and is likely to harm the character and visual amenity of the area and amenity of nearby residents
120 English Heritage	0388	Q190	MJP58	<ul style="list-style-type: none"> <li>· This site adjoins the northern edge of the Registered Battlefield at Towton.</li> <li>· There are several Listed Buildings around Hazlewood Castle (2.3 km to the west of this area) including the Grade I Listed Hazlewood Castle and the Roman Catholic Chapel of St Leonard.</li> </ul>
120 English Heritage	0380	Q190	MJP59	<ul style="list-style-type: none"> <li>· This site lies 920 metres from the northern edge of the Scheduled Monument at Ayton Castle</li> <li>· The boundary of West and East Ayton Conservation Area (which contains a number of Listed Buildings including the Grade I Listed and Scheduled Ayton Castle and the Grade II* Listed Church of St John the Baptist) lies 920 metres to the south of this site</li> <li>· There is a Grade II Listed house north of Low Yemandale Farmhouse 570 metres to the west of this area.</li> </ul>
341 York Handmade Brick Co.	2369	Q190	MJP61	Submitted site submission for extraction of clay next to York Handmade Brick premises.
2824	0103	Q190	WJP09	Consider the site to be unsuitable for the Proposed MRF due to the increased vehicles and impacts upon the local transport network.



**Chapter:                      5**

**Policy No:**

2197	CPRE (Harrogate)	1109	5.189		<p>Notice no quarries submitted in York. Sites in Selby more sustainable as may be able to use them as landfill opportunities, which would reduce the power station waste and colliery waste subject to the location of water tables.</p> <p>Good access to the sites is necessary for health and safety and to protect surrounding designations.</p> <p>The submitted quarries need to be assessed against stringent methodology tests to ensure sites are chosen with minimal land loss, amenity should also be considered.</p>
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**Section:                      028: Waste Site Submission**

**Chapter:                      10**

**Policy No:**

2236	Amey Cespa Ltd (Allerton Waste Recovery Park)	1270		WJP20	<p>New Site Submitted: Allerton Park Quarry, AWRP Application Site, managing 320,000 tpa of LACW and C&amp;I waste, Planning Permission Granted. (See Supporting Statement for further details).</p>
2197	CPRE (Harrogate)	1124	6.101		<p>Sites are preferred with rail access or good road networks close to the market</p>
2236	Amey Cespa Ltd (Allerton Waste Recovery Park)	1267	6.103		<p>AWRP is proposed as a site allocation and a separate 'Call for Sites' submission has been completed in response to para 6.103</p>
2197	CPRE (Harrogate)	1157	Q190	MJP39	<p>New quarry away from village properties and previously quarried land. Do not restore to a lake, if cannot landfill the quarry should be considered unsustainable.</p>
120	English Heritage	0389	Q190	WJP01	<ul style="list-style-type: none"> <li>· The boundary of Spennthorne Conservation Area (which contains a number of Listed Buildings including the Grade I Listed Church of St Michael) lies 590 metres to the south-east of this site.</li> <li>· This site lies 2.5 km from the boundary of the Grade II Registered Historic Park and Garden at Constable Burton Hall. This landscape includes the Grade I Listed Constable Burton Hall, and the Grade II* Coach House and Stables</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1578	Q190	WJP02	A letter objection to the current planning application has been submitted as part of this consultation. In summary the letter objection concludes that application is inappropriate and unjustified development within the greenbelt.
120 English Heritage	0390	Q190	WJP02	<ul style="list-style-type: none"> <li>· The boundary of Escrick Conservation Area (which contains a number of Listed Buildings including the Grade II* Escrick Park and Coach House) lies 1.6 km to the south-west of this site</li> <li>· The boundary of Wheldrake Conservation Area (which contains a number of Listed Buildings including the Grade I Church of St Helen) lies 2.5 km from the eastern boundary of this site.</li> <li>· Swan Farmhouse, a Grade II Listed Building, is situated 1.6 km from the western boundary of this site.</li> </ul>
120 English Heritage	0391	Q190	WJP03	· Kellington Windmill, a Grade II Listed Building, lies 2.3 km from the eastern edge of this area.
120 English Heritage	0392	Q190	WJP04	<ul style="list-style-type: none"> <li>· This site lies adjoins the northern edge of the Registered Battlefield at Towton.</li> <li>· There are several Listed Buildings around Hazlewood Castle (2.3 km to the west of this area) including the Grade I Listed Hazlewood Castle and the Roman Catholic Chapel of St Leonard.</li> </ul> <p>Has concerns about the impact which recycling of waste at this site might have upon elements which contribute to the significance of the Registered Battlefield at Towton. This is a designated heritage asset which the NPPF has identified as being of the highest significance and where national policy guidance makes it clear that substantial harm or loss should be exceptional.</p>
1461 Cunnane Town Planning LLP (on behalf of Samuel Smith Old Brewery)	1579	Q190	WJP04	The site is located within the green belt and Locally Important Landscape Area, and adjoins a Historic Battlefield site and Nationally Important Wildlife site. The aggregate recycling use would be inappropriate in the green belt and would need to be justified with reference to Very Special Circumstances. The development would cause harm to the openness of the green belt and purposes and is likely to harm the character and visual amenity of the area and amenity of nearby residents
2760 White Quarry Farm	0836	Q190	WJP04	This site should be identified for landfill and recycling of waste for the construction industry. The site is close the strategic highways and has low environmental impact.
120 English Heritage	0393	Q190	WJP05	· The boundary of Upper Poppleton Conservation Area lies 1.2 km to the east of this site

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2812 Trans Pennine Trail Office	0067	Q190	WJP06	The current proposal indicates potential use of site(s) adjacent to the Trans Pennine Trail. If the site(s) are progressed would wish to be represented to ensure the best outcome for improvements/enhancement to our route.
120 English Heritage	0394	Q190	WJP06	<ul style="list-style-type: none"> <li>· The southern boundary of Escrick Conservation Area (which contains a number of Listed Buildings including the Grade II* Listed Escrick Park and Coach House) lies 900 metres from the north-eastern corner of this site.</li> <li>· The southern boundary of Stillingfleet Conservation Area (which contains a number of Listed Buildings including the Grade I Listed Church of St Helen) lies 1.8 km from the western edge of this site.</li> <li>· The Gate Piers to Escrick Park, a Grade II Listed Building, lies 1.4 km from the southern edge of this site.</li> <li>· The Garden Temple, a Grade II Listed Building, lies 1.2 km from the eastern edge of this site.</li> <li>· A Scheduled Monument (York prebendary manor moated site) and the associated Manor House which is a Grade II* Listed Building lies 2.1 km from the southernmost point of this area</li> <li>· This north-western corner of this site lies 2.2 km from the boundary of the Grade II Registered Historic Park and Garden at Moreby Hall. This landscape includes the Grade II* Listed Moreby Hall</li> </ul>
120 English Heritage	0395	Q190	WJP07	<ul style="list-style-type: none"> <li>· Pollington Hall, a Grade II Listed Building, is situated 1.2 km from the southernmost extent of this site</li> <li>· There are two Grade II Listed Buildings at Gowdall Broach Farmhouse approximately 1.2 km from the eastern extent of this area.</li> </ul>
2197 CPRE (Harrogate)	1084	Q190	WJP08	Prefer full restoration of this site in line with the original planning application. There should be no further activity beyond that permitted under the planning permission to quarry the site. Surrounded by a Historic Landscape and will impact on the Castle and Listed Structures and Gardens nearby, which are already affected by other development. Once landfill is complete the site should return to agricultural land.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0396	Q190	WJP08	<ul style="list-style-type: none"> <li>· This site lies to the north of and includes part of the Grade II Historic Park and Garden of Allerton Park. This landscape includes the Grade I Listed Mansion, and the Grade II* Listed Church of St Mary and the Temple of Victory.</li> <li>· The Grade II* Temple of Victory lies 820 metres from the site's southern boundary</li> <li>· The boundary of Coneythorpe Conservation Area lies 1.1 km to the west of this site</li> </ul> <p>Has concerns about the impact which an energy from waste facility at this site might have upon elements which contribute to the significance of the high-Grade Listed Buildings at Allerton Park. These are designated heritage assets which the NPPF has identified as being of the highest significance and where national policy guidance makes it clear</p>
330 Harrogate Borough Council	2390	Q190	WJP08	<p>The council has no objection to the inclusion of this site.</p> <p>A decision on the procurement of a new contract for the management of residual LACW, which would lead to the construction of AWRP is expected during 2014.</p>
2854 Norton Action Group	0279	Q190	WJP09	Whitewall Quarry is not a suitable location for a waste disposal site
2824	0104	Q190	WJP09	Consider the site to be unsuitable for the Proposed MRF due to the increased vehicles and impacts upon the local transport network.
3019	1806	Q190	WJP09	There is no need for a materials waste transfer station as one well situated in Malton. It would result in more traffic, increased congestion and air quality damage in Malton and Norton.
120 English Heritage	0397	Q190	WJP09	<ul style="list-style-type: none"> <li>· There are a number of Scheduled Monuments 1.2 km to the south-east of this site (The Three Dykes and a round barrow at West Wold Farm).</li> <li>· There are two Grade II Listed Buildings (Whitewall House and Whitewall Cottages and the attached stable building) at Whitewall Stables 470 metres to the north of this site.</li> <li>· The boundary of Langton Conservation Area, which includes several Listed Buildings, lies 2.3 km to the south of this site.</li> </ul>
116 Ryedale District Council	1211	Q190	WJP09	The principle of the proposal is acceptable but there are concerned that there will be transport issues associated with additional traffic movements to/and from the quarry through Norton/Malton. This could have a negative impact on the designated air quality management zone in Malton. Further concerns regarding potential negative impacts on the local community, including horse racing industry.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
120 English Heritage	0398	Q190	WJP10	<ul style="list-style-type: none"> <li>· The boundary of Wentbridge Conservation Area lies 700 metres to the west of this site</li> <li>· The boundary of Kirk Smeaton Conservation Area lies 1.4 km to the east of this site</li> <li>· Wentbridge Viaduct (470 metres to the west of this site) is a Grade II Listed Building</li> </ul>
120 English Heritage	0399	Q190	WJP11	<ul style="list-style-type: none"> <li>· There are three Listed Buildings in Rufforth to the west of this area, the nearest one of which (a pinfold) would be 250 metres from the westernmost extent of this area.</li> <li>· The boundary of Upper Poppleton Conservation Area lies 1.8 km to the north-east of this site.</li> </ul>
2813	0076	Q190	WJP11	The proposed expansion of the Harewood Whin waste site should not be allowed due to the probable increase in the environmental, transport and local amenity impacts on the village of Rufforth.
129 Yorwaste Ltd	0053	Q190	WJP11	Yorwaste would like to amend their original submission boundary by adding an area to the south of the originally submitted plan so it will include the application boundary of the currently permitted composting pad and proposed Material Recycling Facility and Waste Transfer Station which is currently under consideration by the City of York Council.
120 English Heritage	0400	Q190	WJP13	<ul style="list-style-type: none"> <li>· The western boundary of Halton East Conservation Area lies within 660 metres of this site</li> <li>· The boundary of Droughton Conservation Area lies 1.2 km to the south-east of this site</li> <li>· The boundary of Eastby Conservation Area lies 1 km to the north-west of this site</li> </ul>
120 English Heritage	0401	Q190	WJP15	<ul style="list-style-type: none"> <li>· This site lies approximately 550 metres from the boundary of the Scheduled Monument of the Star Carr Early Mesolithic settlement site.</li> </ul> <p>We have concerns about the impact which this proposal might have upon elements which contribute to the significance of this Scheduled Monument. The NPPF makes it clear that Scheduled Monuments are regarded as being designated heritage assets of the highest significance where substantial harm or loss should be exceptional.</p>
112 Highways Agency	0460	Q190	WJP15	Site near A64, safety at the access junction will be a concern.
120 English Heritage	0402	Q190	WJP17	<ul style="list-style-type: none"> <li>· High Skibeden Farmhouse, 230 metres to the south of this area, is a Grade II Listed Building.</li> <li>· Low Skibeden Farmhouse, 450 metres to the southwest of this area, is a Grade II Listed Building.</li> </ul>

Respondent Number/Name                      CommentNo Paragraph Sites                      Comment

120	English Heritage	0403	Q190	WJP18	<ul style="list-style-type: none"> <li>· Two Scheduled Monuments (Cataractonium Roman forts and town) lies 910 metres from the south-western corner of this area.</li> <li>· There are a number of Listed Buildings around Catterick Bridge 910 metres from the south-western corner. This includes the Grade II* Listed Catterick Bridge</li> <li>· The boundary of Scorton Conservation Area lies 760 metres to the east of this site</li> <li>· The boundary of Bolton-on-Swale Conservation Area (which contains a number of Listed Buildings including the Grade II* Listed Church of St Mary and Bolton Old Hall) lies 980 metres to the south-east of this site</li> <li>· The edge of the Scheduled Uckerby medieval village and open field system lies 1.8 km to the south-west of this are.</li> </ul>
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120	English Heritage	0404	Q190	WJP19	<ul style="list-style-type: none"> <li>· Lodge Farmhouse, a Grade II Listed Building, lies 320 metres from the western edge of this site.</li> <li>· Robin Hood and Little John Stones, a Grade II Listed structure, lies 740 metres from the eastern edge of this area.</li> <li>· There is a Grade II Listed garden wall 720 metres to the north of this site.</li> <li>· The eastern edge of this area lies 930 metres from a moated site which is a Scheduled Monument.</li> </ul>
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**Section:                      029: Any Other Comments**

**Chapter:                      10**

**Policy No:**

1153	NYCC Highways	2408	Q189		At this specific Issues and Options stage would welcome the opportunity to engage with the MWJP team to establish the transport evidence base required to support the Minerals and Waste Joint Plan. This will involve the site specific assessment of sites, including access and connectivity as well as the cumulative impact of potential site locations and their impact on specific strategic junctions across the county.
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**Chapter:                      11**

**Policy No:**

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2236 Amey Cespa Ltd (Allerton Waste Recovery Park)	1263			<p>AWRP forms a central part of the MWJP areas proposals to manage LACW and in part C&amp;I. Paras 2.92-2.94, 6.10, 6.39, 6.44, and 6.47 highlight the significant importance the MWJP needs to place on AWRP to meet LACW capacity requirements and deliver objectives of sustainable waste management.</p> <p>The MWJP proposes to allocate Allerton Park (WJP08) and Harewood Whin (WJP11) in id box 44 as strategic allocations to process LACW. However, it is clear that the MWJP relies upon AWRP for the management of LACW, consequently to be found 'sound', AWRP should be allocated as a Strategic Allocation.</p>
2883	0475			<p>With regard to the recycling of household waste, greater co-operation and integration is needed with residents depositing waste at recycling bring sites and locations on which they are situated, such as supermarkets.</p> <p>These businesses could become managers of waste, coordinating collection of waste with the delivery of goods and co-locating supply depots and recycling facilities to reduce lorry movements. This would place the responsibility of managing packaging waste with those who create it.</p>
3004	2118			<p>Would like to express a preference for a strategy that does not support further exploration and drilling for fossil fuels of any kind. Instead a push towards sustainable energy should be made, including wind and solar energy and biomass.</p>
3012	1955			<p>Concerned that gas operators may be permitted to dump polluted water into the ground at Ebberston Moor, this was not discussed at public consultation meetings. A groundwater permit must be granted if the water is from another location. Planning applications granted for gas extraction were given on the understanding that any gas extraction would be limited to conventional drilling methods, this condition needs to be enforced now and in the future.</p>
157	0148			<p>The MWJP should take account of the public views expressed during previous consultation which include:</p> <ul style="list-style-type: none"> <li>-a preference for maximising recycling and reuse of materials</li> <li>-a preference for a number of treatment centres rather than one</li> <li>-a preference for locating treatment facilities close to major sources of arisings</li> <li>-a desire to minimise the distance waste is transported to reduce carbon emissions</li> <li>-the view that EfW should only be used where heat output can be fully utilised</li> <li>-a recommendation that NYCC should review and take advantage of treatment opportunities outside its boundaries.</li> </ul>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2965	0645			<p>The Plan should include:</p> <p>A target for a progressive reduction in carbon emissions from minerals extraction and waste disposal, based on a reduction on current figures.</p> <p>Take account of the EU 'Resource Efficient Europe' resolution which starts the legislative process of rendering illegal the incineration of any recyclable or compostable material within the EU by 2020.</p> <p>The conventional waste hierarchy should be adapted to take account of the fact that disposal by landfill of dried, inert material is less environmentally damaging than the incineration of carbon-heavy arisings, with or without energy recovery.</p>
1102	Hanson UK	2012		Support the comments made by the Minerals Products Authority.
94	Craven District Council	2354		Support the Issues and Options document.
171	North Yorkshire Waste Action Group (NYWAG)	1035		<p>Need a sound Plan to back up AWRP.</p> <p>Having to take AWRP into account in the Plan predetermines the approach the Plan has to take in relation to LACW.</p> <p>Should not allow AWRP to go ahead until a sound Plan is in place.</p> <p>Public views expressing during the consultations should be given grater weight.</p> <p>The MWJP should be a first step towards the development of locally accepted waste treatment plants, but because of AWRP this will not happen.</p> <p>Themes from the Waste Stakeholder meeting have not taken forward in the most appropriate manner.</p> <p>Concerned about pollution and flooding from waste facilities.</p> <p>AWRP has no flexibility and does not adhere to the proximity principle.</p> <p>The Plan should include District Councils to influence recycling rates.</p> <p>Evidence on waste arising projections not accurate.</p> <p>Should not treat hazardous waste at AWRP.</p> <p>Should not treat radioactive waste in the Plan area.</p> <p>The options presented are not comprehensive or complete, other options should be developed.</p> <p>Options which damage the local economy and job prospects should be excluded.</p>
2766	Derbyshire County Council	0949		Issues and Options for waste management are presented clearly.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
362 Harrogate Friends of the Earth	1392			We appreciate how complex and difficult a set of challenges the Authorities are facing, and the documents and consultation process is commendable. The approach from central government is often intimidating, particularly the issue of shale gas, and it is important that a strong and better working relationship with community and other groups who have an interest in these issues is developed.
362 Harrogate Friends of the Earth	1393			The document as a whole, in particular parts 5 and 8, underestimates the imperatives created by Climate Change. Extraction of fossil fuels will only contribute to the effects.
2925	1881			Concerned about the health risks associated with fracking. Concerned Government will instruct Local Authorities to relax rules regarding preserving National Parks and planning restrictions to protect rural areas which rely on tourism providing employment and economic income.
215	1895			This consultation is a cosmetic exercise and views expressed in relation to AWRP will be ignored.
115 Minerals Products Association	1529			The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectorial voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website. <a href="http://mineralproducts.org/documents/MPA_MTL_Document.pdf">mineralproducts.org/documents/MPA_MTL_Document.pdf</a>
2766 Derbyshire County Council	1001			It is a clear and well presented document.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2865 Zurich Assurance Ltd	1587			Zurich Assurance Ltd own mineral rights (as shown on attached plan) within the Potash Resource Area as defined in Figure 15 of the document.
2951 ***Do Not Consult*** Consulted Under 2874***	0627			If fracking went ahead would loose a lot of water from the water table. Concerns about dangers of fracking. Should invest in renewable energy rather than fracking. Estimates of shale gas vary and the risks are too high when weighed against the benefits.
121 Environment Agency	1276			Reference through the document to PPS's, with the exception of PPS10, should be removed and substituted by other relevant policy documents/legislation as appropriate.
3001	1865			With resources running out we need to consider what we extract and what we do with it. Whilst also looking at the impacts of activities on our environment and atmosphere i.e. climate change.
201	1679			The sudden inclusion of 'minerals, including gas' into the plan is clearly a subversive reference to fracking, this needs to be made explicit in the plan.
2753 Friends of the Earth - Yorkshire & Humber and the North East	1782			<p>Application of the precautionary principle: Development should not go ahead unless it can be proven that adverse impact will not occur. The NPPF uses the term 'use sound science responsibly' which has implications for the Precautionary Principle. In relation to EIA the NPPG references the Precautionary Principle.</p> <p>The 1992 Rio Declaration on Environment and Development alludes to the precautionary principle 'lack full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation', and this is supported by the Interdepartmental Liaison Group on Risk Assessment in a 2002 paper. The EU Water Framework Directive, and Groundwater Directive, provide for the precautionary principle to be considered in planning, and in particular EIA.</p> <p>With regard to Shale Gas extraction, there is evidence to support the proposition that it carries significant risks of groundwater contamination, as covered by a 2012 BGS Report, and it is essential that this is recognised in plan-making and development decisions. Independent legal advice suggests that the quantities of water required by Shale Gas extraction are significant to engage the requirements to conserve and improve water supply planning regulations (NPPF and NPPG). MPAs should demand an EIA of all unconventional gas proposals to assess impacts on soils, water and air.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2980	1898			People need to understand the process of fracking more. It will require a lot of water which may get contaminated. Methane gas may be released into the air. Concerned the process may cause tremors. There will be an increase in HGVs on the roads. Need to decide how the waste from the process is going to be dealt with. Should promote clean energy.
2911	1612			Large scale extraction of minerals is not necessary or desirable. It destroys land and habitats that could be put to better use. Potential for subsidence earthquakes and pollution increased
2789	0008			Found the leaflet difficult to follow and not clear. Black print on dark background is difficult to read. The document must have been costly to produce and circulate.
121	Environment Agency	1290		The chapter would benefit from providing information which sets out the roles of planning control and environmental permitting. This would be useful as would make it clear which issues may be dealt with by which regulations. The EA have developed some guidance to explain the relationship between planning and permitting and their roles and responsibilities in dealing with planning applications where an environmental permit is needed. The guidance note is available at <a href="http://gov.uk/government/publications/developments-requiring-planning-permission-and-environmental-permits">gov.uk/government/publications/developments-requiring-planning-permission-and-environmental-permits</a> and a link to it should be included in the Plan.
2799	0026			Concerned about the approach to consultation, level of detail in the consultation leaflet is too much for the public to process and become engaged.
330	Harrogate Borough Council	2391		The inclusion of development management policies in accordance with the NPPF and the adopted emerging policies of the District are supported.
92	Durham County Council	1797		It is sensible and pragmatic approach to acknowledge that there are significant flows of waste between authorities and that these will continue especially for specialist waste. The approach to waste using the waste hierarchy is welcomed.
2236	Amey Cespa Ltd (Allerton Waste Recovery Park)	1269		The MWJP Team have not provided a response to the proposal to allocate AWRP as a Strategic Facility, submitted in response to the Regulation 18 Launch Document, as indicated by the 'How Comments Are Being Addressed' document published on 15th January 2014.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
546 Farnham Parish Meeting	0481			<p>The Consultation and process and documentation produced are well structured, understandable and easily accessed.</p> <p>Acknowledges the need for on going work to ensure sustainability of resources as set out in the documents.</p>
897 Thornton le Dale Parish Council	0467			<p>Opposed to the deposit of waste at a local landfill beyond its current permission and any planned expansion of a permitted, but as yet not built gas plant, due to the detrimental impact upon the village and its tourism industry.</p>
2954 ***Do Not Consult*** Consulted Under 2953***	1953			<p>The draft Plan does not consider a strategic view of using waste to fill other voids across the Plan area, neither are colliery spoil operators encouraged to look for and pursue alternative options that those detailed in id33 of the document.</p>
3013	2106			<p>Whilst acknowledging the inevitable "constraints" associated with the wording of such a plan, it is considered that definitions/criteria/protocols need to be worded more robustly in order to make the principles of intent less likely to be environmentally damaging. Particularly shale gas extraction.</p> <p>The Plan area contains some of the most eco sensitive and diverse landscapes in the UK. Future minerals and waste development must be subject to public consultation. And the area should be safeguarded for future generations and be developed without succumbing to commercial exploitation.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2753 Friends of the Earth - Yorkshire & Humber and the North East	1780			<p>Justification for considering Climate Change: Section 39(2) of the Planning and Compulsory Purchase Act 2004 makes it a statutory duty for authorities to act with the objective of achieving sustainable development in terms of plans. Whilst Section 19(1A) states: 'DPDs must (taken as a whole) include policies... which contribute to the mitigation of, and adaptation to, climate change' Section 1(1) of the Climate Change Act 2008 commits the UK to at least an 80% reduction in 1990 net carbon levels by 2050.</p> <p>NPPF para 93 and 94 and the NPPG support this, as do statements by Government, including Baroness Hanham in 2013. Local Plans will not be found sound if they do not tackle climate change proactively. The SoS agreed with an Inspector on the Chat Moss Peat Works appeal which was found to be 'contrary to para 93 of the NPPF which seeks to reduce GHG emissions'.</p> <p>An UNEP 2012 Report found that increased use of unconventional gas is likely to be detrimental to efforts to curb climate change and research by the Tyndall Centre supports this.</p>
157	0150			<p>Considers the I&amp;O consultation to be a smoke-screen while AWRP is built. To develop a realistic credible strategy, start with realistic forecasts of: waste volumes, trends in waste treatment systems and overcapacity of incineration and EFW facilities, trend in exports to Europe, waste costs, cooperation with WPAs, legislative influences and changes, market trends and material recovery prices, societal and behavioural change, mineral and aggregate requirements.</p> <p>Reliance on outdated forecasts with lead to a deeply flawed and expensive plan.</p>
157	0149			<p>There is a serious lack of emphasis on cost and value for money. AWRP is not consistent with a strategy that focuses on flexibility, proximity principle, sustainability, moving waste up the hierarchy and provides capacity that is not required. A major rethink is needed, taking proper account of public views.</p>
286 Scarborough Borough Council	2398			<p>Have some concerns in relation to the sustainability appraisal of the options especially the options for mining of potash mining in the Plan area, The SA should form a robust basis for the development of policies within the Plan, but does not always do this in this document.</p>
2862	2120			<p>After careful consideration of the MWJP I appreciate the great thought and effort spent on it.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
362 Harrogate Friends of the Earth	1391			Found some of the language and key concepts were difficult to understand, e.g. there is no definition of 'Safeguarding'. Many of the Options are lengthy and their meaning difficult to grasp.
670 North Stainley-with-Slenningford Parish Council	0281			In view of the shift from using landfill disposal, the minerals and waste aspects of the Plan need to be separated. The consultation is not fit for purpose in terms of engaging non-specialist stakeholders such as volunteer Parish Councils.
113 Howardian Hills AONB	1618			- List of abbreviations should be in alphabetical order - Glossary appears to be missing. - Depiction of the AONBs in the figures. AONBs should be shown in the figures from Fig. 4 onwards. This would illustrate exactly what proportion of various mineral reserves are present in all the nationally Protected Areas (National Park and AONB). It seems inconsistent that AONBs are shown in Fig. 7 and Fig 9 as they will be a significant constraint in relation to waste development as well.
2854 Norton Action Group	0280			There is already strong opposition to a current application for an asphalt plant which is yet to be determined.
1167 Hambleton Sustainable Development and Planning Policy	1220			Take account of the EU 'Resource Efficient Europe' resolution which in part renders illegal the incineration of recyclable or compostable materials by 2020, encouraging the sorting of waste.
3009	2131			Support aspirations towards becoming zero-waste and promotion of proximity to arisings, waste minimisation, access to sustainable transport, co-location and the increase of resource efficiency. All measures welcomed by the construction sector. Jacobs have signed up to WRAPs commitment to reduce landfilled waste from the Construction sector by at least 50% within the next decade and the infrastructure to support this is welcomed.  Clear targets for a progressive reduction in carbon emissions from minerals extraction and waste disposal are needed.
3009	2164			Could not open the comments form because it is a doc.x file, which can't be opened in older version of word.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
231	2134			<p>Document is long and wording of the options is bland. The options should be presented as actual options.</p> <p>The MWJP should provide more specific guidance for evaluating proposals against criteria on sustainability and biodiversity.</p> <p>Would welcome the clarity that is applied to waste streams and mineral volumes be given to emissions of carbon and other pollutants.</p> <p>The policy should include a target for carbon emissions due to minerals extraction and waste disposal based on a reduction on current figures and proposals should be judged against their ability to deliver this. The same principle should be developed for other pollutants such as ozone and nitrous oxide.</p>
3003	2127			<p>The size and complexity of the draft Plan makes it difficult to offer a short/simple response. How many responses were received from parties within the National Park as a percentage of the residents?</p>
2753	1781	Friends of the Earth - Yorkshire & Humber and the North East		<p>It is vital, given the unconventional nature of the technology, that liability and risk are fully catered for financially through conditions, particularly for site restoration and any possible impacts. Other wise the LPA and the a public are left with the risks.</p>
520	0091	East Ayton Parish Council		<p>The Parish Council have concerns about groundwater contamination on the bed of the Vale of Pickering, visual impact and the economic future.</p>
2982	1354	Friends of the Earth		<p>Support submission made by Harrogate District Friends of the Earth.</p>
766	0578	Marton-cum-Grafton Parish Council		<p>AWRP is contrary to aims and vision of the MWJP. [Detailed reasons are recorded against the relevant sections of the consultation document].</p> <p>There is a fundamental failure of the plan to take account of the reason why government withdrew the PFI funding, the reasoning being the facility is not needed because there is sufficient capacity. The inability of the plan to recognise this is a isolationist approach to waste management and a blinkered view by the Council to treat waste in North Yorkshire</p>
2994	1711	Inland Waterways Association- West Riding Branch		<p>Water transport is ideally suited for the sustainable transport of minerals, waste, recyclables and refuse derived fuel. With the likely increase use of Marine Dredged Sand and Gravel, water transport makes logistic sense for onward movement to inland wharves.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2956 ***Do Not Consult*** 2953***	1981			The draft Plan does not consider a strategic view of using waste to fill other voids across the Plan area, neither are colliery spoil operators encouraged to look for and pursue alternative options that those detailed in id33 of the document.
2997	1821			New methods of extracting oil and gas have been seen to damage land, water and air in other countries. The United Nations Environmental Program states ' fracking may result in unavoidable environmental impacts even if unconventional gas is extracted properly. A lot of water and chemicals are used in fracking, which is mixed and injected into the ground. Need to consider how the waste would be treated. Concerned about impact process could have on health and contamination of land and water. Will contribute towards climate change. Should wait for technology advancements so can obtain unconventional gas safely.
766 Marton-cum-Grafton Parish Council	0576			The PC has no confidence in the current consultation process. This is because previously consultations have been carried out but the outcomes have been ignored BPEO (2004), Let Talk Less Rubbish (2005) and Minerals and waste Core Strategy (2011).  This consultation is riddled with inconsistencies about AWRP. By denying stakeholder the opportunity to comment on the inclusion or otherwise of AWRP in the Plan is deliberately stifling objection and tactically accepting that AWRP is aligned with the rest of the Strategy.
1112 RSPB North	1755			Broadly supports approach taken in the HRA Screening Report and in agreement with many of the outcomes, but have a few comments.
1097 Rufforth and Knapton Parish Council	1340			The residents of Rufforth and Knapton are aggrieved by the wanton disregard by NYCC and CYC to the promises made concerning completion and reinstatement when Harewood Whin was first approved. Both bodies have a moral obligation to abide by earlier conditions and undertakings.
883 Sutton-under-Whitstonecliffe Parish Council	1341			The village of Sutton Under Whitestone Cliffe has several traffic management issues which impact upon the local residents. Frequently HGV's fail to ascend Sutton Bank resulting having to reverse in to local fields or lanes. The Village has a narrow historic bridge which cannot be negotiated by large vehicles without travelling in the middle of the road. The Footpaths are narrow. Concerned about the potential increase in vehicle movements through the village and the impact upon local residents.



Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
118 East Riding of Yorkshire Council	1686			Label photos in the document to show relevance and possibly location.
3005	1876			A financial bond should be included in any planning application where restoration is a vital component. There has been little restoration at the active colliery spoil site. Para 8.68 states the NPPF says that bonds should only be used in exceptional circumstances it should be included in the colliery spoil application.
2609 York Environment Forum	2211			None of the Options refer directly to the non-delivery of AWRP, with the funding been withdrawn it is unclear if this still considered as a realistic part of the picture.
2920	1879			Underground storage of toxic water/liquid is not a good idea, it should be removed and cleaned up.
585 Green Hammerton Parish Council	0531			<p>There is no evaluation of the political trend towards waste management, climate change and pollution.</p> <p>Waste technologies have evolved and will continue to change. AWRP fails on nearly all objectives of the Plan and sustainability appraisal. There is time to stop it and choose a cheaper, more flexible and environmentally alternative.</p> <p>There is emphasis on flexibility the AWRP contract has no flexibility. There is emphasis on proximity but AWRP is a single facility for a large county.</p> <p>The Plan appears to exclude District Councils as a major player in influencing recycling and reuse.</p>
2197 CPRE (Harrogate)	1110			<p>High reliance on landfill in the past. Increased recycling and reduction in packaging will reduce the amount of waste going to landfill. More needs to be done to encourage recycling.</p> <p>Should export our waste to neighbouring authorities rather than build AWRP as incineration should be the last resort.</p> <p>If quarries are not landfilled there will be a large loss of land which will be 'permanently out of production.</p> <p>Waste should be dealt with in a sustainable manner in sustainable locations close to the source.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
422 Bilton-in-Ainsty with Bickerton Parish Council	0726			A 25 year solution is the wrong way forward and expensive, the proposed scheme is too large in capacity terms and is the wrong solution. Incineration will increase greenhouse gases and should be the last resort. Alternative methods should be considered. The benefits of increased recycling should be publicised. Should work with District Councils and residents to try and reduce the volumes of domestic waste generated and find low cost flexible approach.
2874	0572			Fracking can have potential irreversible damage on the environment and it will place a large demand upon water resources. Evidence from the US demonstrates it can have negative impacts i.e. earth tremors and pollution to the water table. The benefits and amount of shale gas resources available are highly contested. Focus should be placed upon renewable energy sources.
2873	2107			<p>This Consultation is not fit for purpose. The website is poorly designed and impossible to comment on without Microsoft or a printer, no relevant data or information about the impact of continued fossil fuel use, in contrast to the recent IPCC Report. The document mirrors the work of fossil fuel industry funded organisations, e.g. Royal Academy of Engineering, which are biased in favour of fossil fuel burning, claiming that it is essential.</p> <p>There are major conflicts of interest at every level of the policy making process and I am appalled by the lack of democracy for residents. A small percentage of the population will benefit from this new, almost apologetic, direction and a much larger percentage will suffer inconvenience and an unacceptably high risk of pollution without any financial benefit.</p> <p>I am concerned by a lack of serious thought by all three authorities and I would like to complain in the strongest possible terms about the impenetrable structure of the consultation document and lack of clarity about how to reply. I do not feel that I have a voice on this issue. The Shale Gas industry is intentionally anti-social and the Government is interfering with the democratic process to give that industry an unfair advantage.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2914	2243			It is essential we have available a continuous source of local minerals and aggregates, particularly for agricultural use and the increasing growth in the construction sector. It is more economic to produce and source these valuable commodities locally to save transportation costs and be more sensitive to the environment at large. The extraction of minerals and aggregates must also be financially beneficial to the country, through employment.
968 Womersley Parish Council	0738			It is not clear in this document that a strategic view has been taken on the use of waste to fill voids.
2953	1966			The draft Plan does not consider a strategic view of using waste to fill other voids across the Plan area, neither are colliery spoil operators encouraged to look for and pursue alternative options that those detailed in id33 of the document.
213	1916			<p>The Consultation Document is flawed because it should have been based on a refinement of the consultation exercise in 2011 and the conclusions of the waste core strategy workshop (Oct. 2011), the conclusion of which clearly points the way for a strategy which does not support the AWRP. The AWRP was determined without a strategy in place and immediately after planning permission had been granted NYCC launched a new consultation.</p> <p>The whole approach is unrealistic as it fails to recognise that economic factors must be considered in any strategy.</p> <p>The document fails to consider the role of independent waste contractors adequately. The document is too wordy and has not been focussed on easily understandable key issues.</p> <p>The manner of the questions leads to the possibility that conclusions might not reflect the view expressed and therefore could be judged unsound.</p>
2987	2293			<p>The new methods of extraction oil and gas have severely damaged land, water and air in other countries. Industry figures reveal that 6% of new wells drilled leak immediately and 50% will leak in the following 30 years. The UN Environmental Program states that 'fracking may result in unavoidable environmental impacts even if unconventional gas is extracted properly.' Concerned about the potential risks to water, wildlife, individual homes, historic city of York buildings and possible earthquakes.</p> <p>Concerned about use of water and its subsequent contamination during fracking, will need to consider how to deal with and treat the resulting liquid waste. May cause subsidence and impact on properties.</p> <p>Consultation document is too long and complex and many residents will be unaware of it. Needs to be a more accessible comprehensive consultation process with residents.</p>

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
2955 ***Do Not Consult*** Consulted Under 2953***	1952			The draft Plan does not consider a strategic view of using waste to fill other voids across the Plan area, neither are colliery spoil operators encouraged to look for and pursue alternative options that those detailed in id33 of the document.
252 York Potash	1048	6.04		<p>The situation with regards to extractive waste from mineral operations is expressed by reference to quarries at Kellingley Colliery but waste from Boulby mine, solid waste and saturated brine is disposed of by pipeline into the North Sea. The Proposed York Potash mine would not produce brine but will generate extractive waste from shaft sinking operations. There use as secondary aggregate is limited leaving disposal as the only realistic option.</p> <p>Waste policy should recognise that waste should be managed as close to source as possible to the point or origin.</p>
734 Kirby Hall, Little Ouseburn & Thorpe Underwood Parish Council	1446	6.09		The current rate of 46% and target of 50% by 2020 for recycling are unacceptably low when compared to other areas where greater support has been given to residents to make recycling easier.
911 Tockwith & Wilstrop Parish Council	0078	6.10		Fundamentally disagree with the statement that AWRP is key to achieving the shift from landfill. The argument supporting AWRP is fundamentally flawed. Incineration is the wrong approach. There are more efficient and cost effective alternatives available i.e. prevention, preparation for re-use and recycling. The AWRP should be abandoned in favour of more efficient and effective economical alternatives.
157	0123	6.10		<p>A fresh start needs to be taken and the AWRP should be set aside. New independent evidence should be sought to overcome the bias towards the AWRP.</p> <p>Incineration is outdated with high financial and environmental costs. The scale of the facility is based on outdated projections (based on significant increase over time) this is out of line with local and National trends which show a reduction on waste produced per capita. Realistic projections should be used covering a range of possibilities.</p>
171 North Yorkshire Waste Action Group (NYWAG)	1019	6.14		<p>The study on future waste arising's appears to be based on old NYCC projections of population growth rather than up to date independent data.</p> <p>Use should be made of the independent assessment by Eunomia Research and Consulting which shows that the AWRP capacity id too large.</p>
585 Green Hammerton Parish Council	0511	6.14		The study on future waste arisings appears to be based on old NYCC projections of populations growth rather than up to date independent data.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
157	0132	6.14		The study has used old NYCC projections on Population growth instead of using up to date independent data. The Eunomia Research and Consulting work should be used.
670 North Stainley-with-Slenningford Parish Council	0282	Q189		There needs to be a focus on new areas of search to ensure that one area, such as near this parish, do not become over-burdened with mineral workings. There is a severe and permanent impact on the landscape when sites are restored using water.
116 Ryedale District Council	1212	Q189		Broadly support the SIAM. The SIAM should include consideration of potential effects and impacts on the archaeological heritage. It is Considered that the English Heritage Vale of Pickering Statement of Significance should be included in the list of documents to be considered for desk top study to identify constraints and opportunities as set out in Table 3 Page 11 of the SIAM document. Representatives from each of the District Councils should be part of the panel considering the sites.
1111 The Coal Authority	0889	Q189		The Coal Authority welcomes the inclusion of land instability as a constraint in Table 2, in relation to waste sites an additional criterion to consider mineral sterilisation should be included.
713 Kirkby Fleetham with Fencote Parish Council	1428	Q189		Reasonable approach, but just because no proposals have been put forward for the development of mineral sites so far, does not mean that known potential locations should not be 'preserved' This is especially the case for aggregates, sand and clay.
121 Environment Agency	1304	Q189		Pleased to note that the protection of groundwater is included as a major environmental constraint. Just to note, the text, "Groundwater Protection Zone 1" is incorrect and it should actually say "Groundwater Source Protection Zone 1 (SPZ1)".
122 CPRE (Swaledale Branch)	1358	Q189		Whilst the primary objective of CPRE is to protect Rural England it is understood that there is a need to extract some minerals, this must be done in the least destructive way. In the SIAM we broadly agree with the suggestions and could not find any specific detail to disagree with. The use of the expert panel is supported. Would welcome the opportunity to discuss the sites with you in more detail at the appropriate stage.
119 Natural England	0935	Q189		Impacts on SSSI's should be identified as and overriding environmental constraint in step 1, Stage 2.  At Step 4- panel review- Natural England can provide further advice, however due to current resources, attendance at specific sessions will be dependent on the sites discussed.

Respondent Number/Name	CommentNo	Paragraph	Sites	Comment
128 Yorkshire Wildlife Trust	0777	Q190		A spreadsheet showing which sites are within 200 metres of Ancient Woodland, the Trust's Living Landscape and Local Wildlife Sites has been submitted. This work would be an excellent guide to what type of restoration would be appropriate for the sites which have been put forward.
2197 CPRE (Harrogate)	1147	Q190		Support the need to identify mineral sites where waste development will be acceptable. Many of the submitted sites have waste treatment facilities included in their after use, but not many use waste in their restoration. Reed bed lakes are unsustainable land use. Would prefer to see sites being chosen where there is landfill capacity and available inert waste in close proximity. Sites should be on the lowest grade land to retain BMVL for agricultural use.
120 English Heritage	0337	Q190		<ul style="list-style-type: none"> <li>- Many of the sites could impact on heritage assets. An assessment needs to be undertaken to evaluate the impact the potential sites could have on elements which contribute to the significance of assets before they are allocated.</li> <li>- Where relevant the sites should be assessed against the Managing Landscape Change study.</li> <li>- Comments on sites which cause particular concern. For those areas it will be necessary for the Joint Plan to clearly demonstrate that their development would not compromise national planning policy regarding the conservation of designated heritage assets of the highest significance.</li> <li>- The comments are based on a brief desk top assessment and highlight the areas which appear to have the most impact on the historic environment. The absence of a comment should not be seen as an indication of support, may raise objections at a later stage in the Plan process if necessary.</li> </ul>

## Contact us

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