

Publication stage Response form - Part B Please use a separate Part B form for each representation		
Name or Organisation :	Ryedale Liberals 1.2 Appendix 1	
<ul style="list-style-type: none"> To which part of the Minerals and Waste Joint Plan does this representation relate? 		
Paragraph No./ Site Allocation Reference No.	Policy No. Vision ii Efficient use 3846/0967/4.001/LC.U.DTC	Policies Map
2. Do you consider the Minerals and Waste Joint Plan is :		
2.(1) Legally compliant	Yes x	No x
2.(2) Sound		
(2a) Which Element of soundness does your representation relate to? (please only mark with an x one element of soundness per response form).		
<i>Positively Prepared</i>	Yes x	<i>Justified</i> Yes x
<i>Effective</i>	Yes x	<i>Consistent with National Policy</i> No x
2 (3) Complies with the Duty to co-operate Yes x		
<p>3. Please give details below of why you consider the Minerals and Waste Joint Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.</p> <p><i>We agree that shale gas 'may prove to be' of national and local importance. However, this does not answer our objections. The ministerial statement does not refer to the CCC three tests. Our response does not change the national policy position. Our response stating that the national policy should be delivered in a safe, sustainable and timely way does fit in with the ministerial statement of Sept 2015. The rest of the response struggles to find sufficient evidence to produce a logical point. It would be simpler to be told that climate change doesn't matter. If it does, then better reasoning needs to be produced.</i></p> <p>There are no policies to require the efficient use of shale gas. The Knapton Power Plant is not known to be very efficient (about 30%thermal efficiency, as compared with 50-60% for modern gas powered plants), and there are no plans for more efficient gas power stations in the area that we know of. We are told that the justification of Hydrocarbon development/fracking is as a transition fuel towards a low carbon economy, and to achieve national fuel security. Therefore it would seem sensible to have in place policies that can ensure these aims. There</p>		

should be minimum energy efficiency requirements for the use of the gas, and proof of what other fossil fuels it will be displacing. Without a policy of this sort it will not be compliant with National climate change commitments (the Paris agreement) or with sustainable development definitions. This is backed up by the conditions put forward by the government's own

Committee for Climate Changes , see below.(Red are comments by us)

| theccc.org.uk/wp-content/uploads/2016/07/CCC-Compatibility-of-onshore-petroleum-with-meeting-UK-carbon-budgets.pdf (URL no longer available). Their assessment is that exploiting shale gas by fracking on a significant scale is not compatible with UK climate targets unless three tests are met:

Test 1: “Well development, production and decommissioning emissions must be strictly limited. Emissions must be tightly regulated and closely monitored in order to ensure rapid action to address leaks.”

Emissions from wells must be below 3% of total amount produced from shale, in order to justify gas being a transition fuel in place of coal. Venting of methane should not be permitted. Flaring of unwanted gas is both wasting the resource and highly polluting as well as noisy. It is therefore undesirable and should not be permitted. Green completions are best practice and should be a requirement.

Test 2: “Consumption – gas consumption must remain in line with carbon budgets requirements. UK unabated fossil energy consumption must be reduced over time within levels we have previously advised to be consistent with the carbon budgets. This means that UK shale gas production must displace imported gas rather than increasing domestic consumption.”

There is currently no carbon and capture storage technology available, and has yet to be shown to be fully successful and economical. It is however a necessary way to decrease greenhouse gas emissions. It would only be available when in association with electricity generation. Research in this field has had funding withdrawn.

Test 3: “Accommodating shale gas production emissions within carbon budgets. Additional production emissions from shale gas wells will need to be offset through reductions elsewhere in the UK economy, such that the overall effort to reduce emissions is sufficient to meet carbon budgets.”

Offsetting needs to happen as we go along, not at some time in the distant future. The reductions elsewhere in the economy need to be tracked and provable

(continue on a separate sheet/expand

box if necessary)

4. Please set out what modification(s) you consider necessary to make the Minerals and Waste Joint Plan legally compliant or sound, having regard to the Matter you have identified at 3. above where this relates to soundness. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Minerals and Waste Joint Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include a policy that requires “Green Completions’

The policy must require production of shale gas to be in compliance with the 3 conditions laid out by the Committee on Climate Change, and paragraph 94 of the N.P.P.F.

Include a requirement that the shale gas produced should be offsetting imported gas, or

replacing other fossil fuels and require that this is demonstrated and enforceable. There should not be a time lag over this replacement of more than one year.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.
After this stage further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As the response does not answer our point we feel there needs to be discussion at the EiP.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

All responses received will be considered and any information provided will be made public. My consent is hereby confirmed.

Signature: John Clark

Date 11 Feb 2018:

Hard copy to follow with signatures and to confirm yes/no correctly identified.