

Matter 2: Waste

Issue: *“Whether the vision, objectives and strategic waste policies seek to manage waste sustainably and provide sufficient and appropriate waste management capacity in appropriate locations.”*

Question 81: *“Are the reasons for selecting allocated waste sites/preferred areas over reasonable alternatives made clear in the SA? Have all reasonable alternatives made clear in the SA? Have all reasonable alternatives been set out.”*

1. Appendix 2 of the Sustainability Appraisal (SA) report clearly sets out the methodology for selecting allocated Construction, Demolition & Excavation (CD&E) sites.
2. The reasons for selecting these sites is led by the allocation of sites for mineral extraction and the subsequent requirement to restore the extraction sites. The need for allocating sites for clay extraction is set out further in Plasmor’s response to question 46.

Question 102: *“How does the evidence demonstrate that the allocated sites in Policy W05 (Meeting waste management capacity requirements – CD&E waste including hazardous CD&E waste) are appropriate to meet identified CD&E waste management requirements?”*

3. The supporting evidence demonstrates that North Yorkshire generates a significant volume of CD&E waste. The Draft Joint Plan states that there is a need for both additional recycling capacity and landfill capacity, although the scale of the additional requirements cannot be defined precisely and is dependent on future recycling rates. It is therefore appropriate to allow for a degree of flexibility in the plan.
4. The proposed Joint Plan allocates 3 sites for the landfill of CD&E Waste, including the land adjacent to former Escrick Brickworks (WJP06). The allocation of this site provides the security of a landfill site for CD&E waste in the latter part of the plan process. Accordingly its allocation is appropriate to contributing to meet the identified CD&E requirements.

Question 104: *“Yorkshire Wildlife Trust object to the allocation in Policy W05 of Land adjacent to former Escrick Brickworks (WJP06) largely on the basis of the impact on the York-Selby cycle path SINC, agricultural land, traffic and the local environment generally. Can these potential impacts be acceptably mitigated? How has the balancing exercise justified the*

allocation? Escrick Parish Council objects to the large size of the site. Is the scale of the site justified?"

- *Can the potential impacts on the York-Selby cycle path Site of Importance for Nature Conservation (SINC) be acceptably mitigated?*
5. We have not had access to the full consultation response from Yorkshire Wildlife Trust or Escrick Parish Council or other consultees who may have raised environmental matters. We have reviewed the summary available on North Yorkshire County Council's website and provided responses on the environmental issues raised.
 6. The York-Selby Cycle Path bisects from north to south the land the subject of the allocation in Policy W05 of the allocation on the land adjacent to former Escrick Brickworks (WJP06). Yorkshire Wildlife Trust state in their response to the Draft Plan that the York-Selby Cycle Path is a Site of Importance for Nature Conservation (SINC) and that this should consequently be included in Appendix 1 of the Draft Plan. North Yorkshire County Council agree and suggest a revision to the text in Appendix 1 to make reference to the York-Selby Cycle Path SINC. Plasmor agree with this amendment as it is an important planning consideration that should be included in the final plan.
 7. In July 2017 North Yorkshire County Council issued a scoping opinion under Regulation 13 of the Town and County (Environmental Impact Assessment) (England and Wales) Regulations 2011 for the *"extraction of clay (to be exported to the existing Plasmor facility at Great Heck), construction of a new site access from the B1222, site restoration through importation of inert restoration materials to agriculture and nature conservation after use including water bodies, wetland habitats and the creation of public access on land adjacent to and to the north of the former Escrick Brickworks, Escrick, North Yorkshire, YO19 6ED."* The Scoping Report included survey results based on an anticipated extraction boundary referred to as 'the site'. The site was located within the allocated area on land adjacent to the former Escrick Brickworks. The scoping opinion included comments from a range of environmental specialists on the scope of information to be provided within any forthcoming Environmental Impact Assessment. Notably the scoping opinion raised no 'in principle' environmental issues with the proposal for the extraction of clay or the restoration of the site using CD&E waste.
 8. In the scoping opinion the County Ecologist states that *"the restoration of the site provides an excellent opportunity to create habitats of value for biodiversity and ideally*

these should be characteristic of the local environment, seeking to extend networks of habitats and utilising native species.” The Yorkshire Wildlife Trust also commented that *“The SINC will also provide excellent opportunities for connecting up habitat through the restoration process”*.

9. In terms of the environmental impacts on the York-Selby Cycle Path SINC a range of baseline ecology surveys were undertaken in 2017 to understand the baseline ecological conditions at the site. A statement from ESL (ecological consultants who have undertaken the ecological surveys at the site) is provided below.

“Part of the proposed application area is immediately adjacent to a 300m stretch of the York-Selby cycle path SINC. The SINC comprises a hard surfaced cycle track between two verges of scrub and semi-mature trees (bound in parts by hedgerows) that form a green corridor through the arable landscape. All of the land within the proposed application area that adjoins the SINC is currently under intensive arable production with no buffer habitats present.

The cycleway crosses the Bentley Park Drain via a culverted land bridge and dissects the application area into two parcels. The farmland either side of the SINC is currently accessed by tractors and other farm vehicles via an unsurfaced field track along the north bank of Bentley Park Drain that crosses the cycleway at the location of the land bridge.

The trees and/or hedgerows along the outer edges of the SINC will be protected by root protection zones throughout the quarrying operations and this in turn will provide a strip of buffer habitat between the green corridor and the active quarry that does not currently exist.

The arable fields adjacent to the SINC are subject to regular farming operations with standard farm machinery and the cycleway is well used by cyclists, runners and dog walkers. As such there is already frequent disturbance to the corridor which limits the daytime use of the SINC to species that are resilient to such levels of disturbance.

There will be no quarrying or restoration operations outside of daylight hours and as such there are no requirements to install any artificial lighting that would result in disturbance to commuting and foraging bats or other light phobic nocturnal species. Best practice working methods will be employed to ensure that the habitats within the SINC are not subject to any dust contamination. In conclusion therefore, it is considered that all potential negative impacts on the SINC as a result of the proposals can be avoided or fully mitigated.”

10. For the above reasons it is considered that any ecological impacts arising as a result of the restoration of the site using C D&E waste within the allocated area on land adjacent to former Escrick Brickworks (WJP06) can be acceptably mitigated.
 - *Can the potential impacts on agriculture be acceptably mitigated?*
11. Impacts on agricultural land will be considered during the design of the proposed scheme as requested in Natural England’s response to the Scoping Opinion provided by North Yorkshire County Council *“any application would assess the impacts of the development on farm structure and viability, and on other established rural land use and interests, both during the site working period and following its reclamation.”* Impacts on agricultural land will be considered through the preparation of an agricultural land survey, soil survey and assessment of potential impact upon best and most versatile agricultural land. Careful design, soil stripping and soil management in accordance with good practice and careful restoration as is carried out at the current Hemingbrough site will mitigate potential impacts to agriculture.
12. Consideration of impacts on agricultural land will be an important matter during the design of the proposed restoration scheme. The existing agricultural use will be temporarily stopped if the site was used for clay extraction. However there is the potential for the site to be returned to agricultural use as part of the proposed restoration scheme. This will have to be carefully balanced with other important considerations such as ecological and biodiversity enhancement and opportunities for public access.
13. Fundamental to the design of the proposed Escrick site will be the restoration proposals. At the current Escrick site and at Hemingbrough the accepted principles of the restoration are similar and include nature conservation comprising water bodies, wetland

habitats, tree and hedgerow planting together with public access. It is likely that the restoration of the proposed Escrick site will include agricultural use balanced with other uses such as nature conservation and public access. The detailed restoration proposals will be developed as part of the Environmental Impact Assessment.

14. For the above reasons the potential impacts on agriculture are capable of being acceptably mitigated.

- *Can the potential impacts on traffic be acceptably mitigated?*

15. Preliminary work has commenced on assessing the baseline traffic and transport conditions on the allocation in Policy W05 of the land adjacent to former Escrick Brickworks (WJP06) by Tesh Consultants Ltd (involved in the scoping process and access design). They have provided the following comments:

“Two options for connecting the proposed extraction area at Escrick to the local road network have been considered. These are:

“A haul road from the proposed extraction area northwards to the C307 Cawood Road to a point approximately 300m west of the C307 Cawood Road bridge.

A haul road from the proposed extraction area eastwards to the existing processing area on the former Escrick brickworks site and using the existing access onto the A19. The York-Selby cycle path would be crossed by a temporary bridge over the cycle path to provide segregation between pedestrians and cyclists and the quarry traffic. The temporary bridge would be removed once the extraction area has been restored.

As most of the minerals being extracted from the proposed extraction area are to supply Plasmor’s manufacturing facilities the clay extraction and exportation rate is closely aligned with the manufacturing production rates it is predicated that there would be an average of 60 HGV loads per day. This equates to a daily average of 120 one-way HGV movements. This predicted level of traffic is well within the capacity of both the C307 Cawood Road and the A19. The HGV movements would be spread throughout the day which

equates to 14 one-way movements per hour (or a one-way movement every 4 minutes) for the quarry's anticipated working hours of 07.00-16.00hrs. Impact during peak hours on the road network would be minimal.

Restoration of the proposed extraction area will commence during the extraction period using overburden from the mineral extraction areas. Once all the reserves are exhausted inert fill material will need to be imported to complete the restoration. The import of inert material will be at up to the same rate as the production rates, namely a daily average of 120 one-way movements. The predicted level of traffic is well within the capacity of both the C307 Cawood Road and the A19. Impact during peak hours on the road network would be minimal."

16. The above comments and baseline work demonstrate that potential impacts on traffic and transport as a result of restoration of the site using CD&E waste within the site allocation area identified in Policy W05 are capable of being acceptably mitigated and therefore the allocation is justified.
 - *Can the potential impacts on the local environment generally be acceptably mitigated?*

17. Whether environmental impacts on the local environment as a result of the allocation of the site can be acceptably mitigated will be considered and assessed as part of the EIA and planning application process. Plasmor have engaged baseline environmental studies in accordance with the Scoping Opinion received from North Yorkshire County Council. None of the technical consultees providing input into this process have identified any significant constraints/ adverse impacts that it is considered cannot be overcome/mitigated to an acceptable level. Any planning application will be subject to an Environmental Impact Assessment in which the impacts of a proposal will be robustly assessed. It is considered that appropriate mitigation can be put forward to ensure the potential impacts on the local environment are minimised.
 - *How has the balancing exercise justified the allocation?*

18. The evidence for the Draft Joint Plan has identified a need for additional capacity for managing CD&E waste which includes a requirement for additional landfill capacity. Several sites including WJP06 have been allocated in the plan and this will help reduce

the identified capacity gaps. The authority state that this is particularly important in the latter half of the plan period which this allocation will provide capacity for. The restoration of the site is a necessary part of mineral extraction operations.

- *Escrick Parish Council objects to the large size of the site. Is the scale of the site justified*
19. The size of the restoration area allocated under Policy W05 is led by the size of the mineral extraction area progressed under Policy M13. The supporting text to Policy M13 states in paragraph 5.77 that *“it is not expected that development of the whole of the preferred area would be acceptable under this policy.”* and that *“any proposals needed in the longer term to maintain supply to the Plasmor blockworks would need to be carefully designed within the preferred area to ensure protection of the environment”*. Plasmor agree that it is unlikely that the entirety of the area will be taken forward. The company look to retain a sufficient land bank to support the block manufacturing site at Great Heck. The extent of any extraction area and subsequent restoration would be defined based on the results of environmental surveys, working methods and design mitigation requirements together with restoration design.