

Minerals and Waste Joint Plan



Sustainability Appraisal

Summary of Responses to the SA of the
Publication Draft and Addendum of
Proposed Changes to the Publication Draft
November 2017

Minerals and Waste Joint Plan Sustainability Appraisal - Summary of responses at Publication and Addendum of Proposed Changes to the Publication Draft stages (and Authorities Response)

This document contains a summary of the responses received during the consultation period for the Publication Draft (Table 1) and the Addendum of Proposed Changes to the Publication Draft (Table 2). Each table includes a summary of consultation responses (Respondent Comments), any suggested changes (Respondent Suggested Change), the Joint Plan Authorities Response and any action undertaken by the Joint Plan Authorities. The tables only include responses which were directly relevant to the Sustainability Appraisal.

Table 1 - Minerals and Waste Joint Plan Sustainability Appraisal - consultation comments on Joint Plan Publication (Nov 2016)

Ref	Section/page	Respondent Comment	Respondents Suggested Change	Joint Plan Authorities Response	Joint Plan Authorities Actions
Egdon Resources					
1	Chapter 5 Key spatial principles for oil and gas Page 81 - 84	<p>Key spatial principles for oil and gas</p> <p>The Sustainability Appraisal of the key spatial principles for oil and gas is flawed and, as a result, does not give a fair representation of the scores against the 17 sustainability appraisal objectives.</p> <p>SA Objective 8— Minimise Resource use</p> <p>This objective has been wrongly applied as it appears as a moderate negative effect in respect of options 1-5 and as a high negative effect in option 6. All options are judged to be negative in relation to minimising the use of resources ‘owing to the support they offer to the extraction of a non-renewable resource.’ By definition, therefore, if no hydrocarbon extraction activity took place, this sustainability objective would receive a positive score. This would conflict with national planning policy which states that there is a national need to explore for shale oil and gas. Instead, this</p>	<p><i>Amend to more accurately reflect the great importance the Government attaches to hydrocarbon extraction in national policy and guidance and to enable the delivery of sustainable development.</i></p>	<p>It is considered that the application of the sustainability appraisal (SA) objectives provides a fair and consistent representation of the likely sustainability effects of the six Key Spatial Principles for Oil and Gas policy options assessed (three options at the Issues and Options stage of the plan, and three alternative options developed following consultation).</p> <p>SA Objective 8 ‘<i>Minimise the use of resources and encourage their re-use and safeguarding</i>’ is an environmental protection objective under the SEA Directive Annex I (f) environmental topic area – material assets. The objective seeks to identify the likely environmental effects of implementing the policy options to the baseline situation. In this case on minimising resource use to safeguard future resources and encourage efficiency and re-use of</p>	<p>Noted. No action required.</p>

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		<p>scoring should be applied to the resources that are used to undertake extraction, not the material itself. The majority of resources are used during the construction of a wellsite using aggregates, and the drilling operations during exploratory activities. This correction would result in a considerably improved overall assessment for all options but, in particular, option 6. Option 6 would have less adverse negative impacts than any other option, including option 1.</p> <p>Option 6 would allow for the grant of planning permission for exploration, appraisal or production of oil and gas and unconventional hydrocarbons, provided they do not result in any significant adverse impact on local communities or the environment. This option is more aligned with national planning policy which places great weight upon the need for minerals whilst ensuring that the environment is protected.</p>		<p>resources. As outlined in the SA Report, Option 6 supports a wider range of hydrocarbons and would have a higher negative effect on the baseline than other policy options. It is not considered appropriate to only consider the extraction process in relation to minimising resource use as the SA seeks to take a holistic approach, considering all stages of the process and likely effects on the environment.</p> <p>If no hydrocarbon extraction took place the policy option would record a neutral (0) score according to the matrices table on pages 19/20. As <i>'the option would have no (or an insignificant) effect on the baseline and the achievement of the SA Objective.'</i></p> <p>It should also be noted that the National Planning Policy Framework (NPPF) states that <i>"a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors"</i>. It is considered that the SA that has been undertaken represents a fair and consistent appraisal of the Plan within this context.</p>	
2	<p>Chapter 5</p> <p>Key spatial principles for oil and gas</p>	<p>SA Objectives 1,10,11,14</p> <p>The assessment concludes that Options 1-5 would all give rise to negative effects on the landscape, natural and historic environment</p>	<p><i>Amend to more accurately reflect the great importance the Government attaches to hydrocarbon extraction in national policy and guidance</i></p>	<p>Option 1 is considered to perform best overall of the six policy options, providing benefits to protecting the natural environment, landscapes and</p>	<p>Noted. No action required.</p>

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	Page 81 -84	<p>and recreation. There is further justification, therefore for concluding that Option 6 performs the best overall.</p> <p>Policy Progressed by the Plan</p> <p>The option progressed by the Plan fails to support the principle of oil and gas development and does not reflect national planning policy. If a more balanced and sensible approach had been applied in respect of assessing the various options against SA objective 8, the Plan would have better reflected the guidance in both the NPPF and the Mineral PPG which supports the growth of sustainable hydrocarbon development.</p>	<i>and to enable the delivery of sustainable development.</i>	<p>also supporting local economies.</p> <p>Further assessment work undertaken for the publication stage SA has resulted in elements of options 3, 4 and 6 being incorporated into the policy progressed by the plan. As a result Policy M16 supports the principle of oil and gas development in appropriate locations, reflecting national policy, and also provides a high level of environmental protection to the natural and historic environment as required by national planning policy.</p> <p>As above, the NPPF also requires that a SA consider all the likely significant effects on the environment, economic and social factors. It is considered that the SA represents a fair and consistent appraisal of the Plan within this context.</p>	
Friends of the Earth					
1	Chapter 5 Page 61	<p>Matter 2: The Sustainability Appraisal <u>Acknowledgement of Climate Change Impact</u></p> <p>Linked to the issues of legal compliance, we have looked at the findings of the council's Sustainability Appraisal (SA). SA is required during the preparation of Local Plans, allowing the plan making authority/ authorities to assess how its objectives and policies will contribute to the achievement of sustainable development as per PCPA (2004). The methodology and remit of the SA should meet Government guidelines which are currently enforced by a European Directive on Strategic Environmental Assessment (SEA). Both strategic and policies</p>	No proposed change to SA but <i>'supports... consideration of climate change mitigation should be included in explicit in detail within the plan's relevant hydrocarbon policies.'</i>	<p>It is noted in the SA Report that for both the 'implementation of the objectives of the plan' (p61) and the 'no plan is adopted' alternatives (p68) that the emissions baseline (rate of greenhouse gas emissions) would improve, but atmospheric concentrations would cumulatively worsen, for both alternatives. Relevant paragraphs are provided below.</p> <p>It is expected both with and without the plan objectives that atmospheric concentrations would cumulatively worsen.</p>	Noted. No action required.

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		<p>within the evolving plan are assessed against social, economic and environmental objectives, including impacts on climate change (i.e. sustainability appraisal framework). The North Yorkshire SA includes criterion #6 'reducing climate change'.</p> <p>In addition, the SEA Directive requires such documents consider reasonable alternatives are considered by plan makers. Planning Practice Guidance states that reasonable alternatives are:</p> <p><i>"...the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable."</i> (Paragraph: 018 Reference ID: 11-018-20140306)</p> <p>Section 5 of the SA compares the reasonable alternatives for the objectives of the plan in the context of the plan being adopted and it not. The council acknowledge that with the option of plan adoption, with regards to impacts on reducing climate change objective #6:</p> <p><i>"atmospheric concentrations of CO2 would cumulatively worsen as a result of these plan objectives"</i> (pg61)</p> <p>In comparison, the do nothing approach (i.e. not adopting the plan) states that this alternative would lessen the rate of greenhouse gas emissions with regard to the climate change objective. Here there is quite clear that objectives of the plan, which include sourcing unconventional oil and gas hydrocarbons, will have tangible climate</p>		<p>Implementation of the plan objectives: <i>"It should be noted while emissions baseline would likely reduce under this alternative, the baseline of atmospheric concentrations of CO2 would cumulatively worsen as a result of these plan objectives."</i></p> <p>No plan is adopted: <i>"Overall, it is considered that this alternative would lessen the rate of greenhouse gas emissions (an improved baseline), though as climate change is cumulative effects on the baseline of greenhouse gases in the atmosphere would worsen."</i></p>	

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		change impacts. While this is not expected – and we are not suggesting that the alternative do-nothing scenario is taken – this supports our point made in matter 1 above, that consideration of climate change mitigation should be included in explicit in detail within the plan’s relevant hydrocarbon policies.			
2	Chapter 6 Page 112	<p>Questionable “positive” effects of M16</p> <p>The SA also considers the potential of Policy M16 to impact on sustainability criteria, including #6. The report states that the chosen approach incorporates a mix of reasonable alternatives, stating that the policy has been adapted substantially since even the preferred options stage. Regarding criterion 6, reducing climate change, the document suggests that possible impacts could be positive as well as negative:</p> <p><i>“Mixed effects are reported for climate change as on the one hand shale gas may generate significant traffic movements, while on the other hand it may provide a domestic source of gas that could offer an alternative to liquid natural gas (LNG) and coal, resulting in carbon savings, though this is uncertain as it also depends on higher level policy decisions made by energy providers and government.” (pg 112 – SA)</i></p> <p>We find this assumption that shale gas could</p>	<p><i>We are therefore of the view that the plan making authorities have failed to consider the CCCs findings within its scoring Policy M16 in respect of the “reducing climate change” objective. Current impacts envisaged include the following:</i></p> <ul style="list-style-type: none"> • <i>“minor/ low level positive effects”;</i> • <i>“minor/ low level negative effects on the baseline”</i> • <i>“Uncertain impacts of the objective on the baseline”</i> <p><i>Assuming that the 3 CCC tests cannot be met, and when additional factors such as methane leakage or burning of the fracked methane are taken into consideration, our view is that likely impacts for the</i></p>	<p>The SA seeks to predict the likely effects of the plan by <i>‘Identifying the changes to the environmental baseline which are predicted to arise from the plan or programme, including alternatives.....’</i>¹ As such, Policy M16 is considered against the baseline environment. The UK’s supply of electricity is made up of a significant amount of liquefied natural gas (LNG) and coal (28% was supplied by gas (26% of which is LNG) and 28% by coal, in 2014²). Generally domestic sources of shale gas are considered to have a lower carbon footprint than LNG or the use of coal³. Therefore, the development of shale gas in the plan area has the potential to replace more carbon intensive forms of energy such as coal and LNG and have what is considered a minor positive effect on the baseline. As noted in the SA Report there is uncertainty around this positive effect as it is dependent on national</p>	Noted. No action required.

¹ ODP, 2006. A Practical Guide to the Strategic Environmental Assessment Directive’ ODP, London.

² See DECC, UK Energy in Brief 2015. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/516837/UK_Energy_in_Brief_2015.pdf

³ See DECC, 2013. Potential Greenhouse Gas Emissions Associated with Shale Gas Extraction and Use

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/237330/MacKay_Stone_shale_study_report_09092013.pdf

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		<p>lead to carbon savings (depending on the national level uncertainties) as highly questionable, especially when available evidence suggests the Government is not able to meet the 3 CCC tests (as mentioned in matter 1) required to justify shale production in terms of the carbon budget. Test 3 states that <i>“emissions from shale exploitation will need to be offset by emissions reductions in other areas of the economy to ensure UK carbon budgets are met”</i>. It is public knowledge that Carbon Capture and Storage (CCS) incentives for coal and gas generating power-stations have been redacted; the government has drastically reduced subsidies for renewable energy and that plans to make all new homes zero carbon by 2016 have also been scrapped. It is funding to which has all been substantially reduced to the point where they are no longer viable. The potential for any positive impacts as a result of Policy M16 is therefore in serious doubt in our view. Nor can these emissions reductions be directly related to the planning consent given to fracking. Evidence clearly demonstrates that the approval of fossil fuel extraction merely adds to the amount of fossil fuels extracted and that there is no displacement (see nature.com/nclimate/journal/v4/n9/full/nclimate2335.html and ssb.no/en/forskning/discussion-papers/%20attachment/123895?%20ts=13f51e5e7c8)</p>	<p><i>“reducing climate change objective” would be as follows:</i></p> <ul style="list-style-type: none"> <i>“The option is predicted to have higher negative effects and the achievement of the SA objective”.</i> <p><i>Uncertain impacts of the objective on the baseline”</i></p>	<p>policy decisions.</p> <p>It is noted that the Committee on Climate Change (CCC) assessment⁴ has identified three tests that would need to be met to allow petroleum extraction on a significant scale to be compatible with UK carbon targets and this outcome is uncertain.</p> <p>However, as noted above, in line with guidance the SA seeks to predict the effects of the policy against the current baseline. Therefore the scoring of Policy M16 against the SA Objective 6 is considered robust.</p>	

⁴ CCC, 2015. Onshore Petroleum. The compatibility of UK onshore petroleum with meeting the UK’s carbon budgets. <https://www.theccc.org.uk/wp-content/uploads/2016/07/CCC-Compatibility-of-onshore-petroleum-with-meeting-UK-carbon-budgets.pdf>

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Historic England					
1	Page 18 Appendix 4 (MJP17)	<p>The site visit has confirmed our view that mineral development of this site is likely to harm the setting of both the Grade II Listed Rudd Hall and its neighbour the Grade II Listed Gyll Hall.</p> <p>Rudd Hall occupies a prominent hill-top site and has clearly been designed to command views across the surrounding landscape. The Heritage Impact Assessment, which accompanied the Sustainability Appraisal, considered that this site “forms an important part of the agricultural landscape context” of this building. We would concur with this evaluation.</p> <p>In a similar manner the principal elevation of Gyll Hall commands views in a southerly direction across the land which falls away from the house towards Lords Lane. Once again, the Assessment considered that this area formed part of “the wider agricultural landscape” which is “important to the significance” of Gyll Hall. Again, we would agree with this evaluation.</p> <p>As a result, the Heritage Impact Assessment considered that the loss of this site and its subsequent development for minerals extraction would be likely to have a “moderately negative effect” on the significance of the both these Listed Buildings (i.e. the second-highest magnitude of harm). We would endorse this conclusion. Moreover, it does not appear from the Appraisal that this harm is capable of mitigation in a manner which, itself,</p>	<p><i>Therefore, in order to safeguard the setting of these buildings Site MJP17 should be amended as follows:-</i></p> <p><i>(1) The land to the south of Gyll Hall Lane should be removed from the Allocation</i></p> <p><i>(2) The western extent of the Allocation lying between Leases Lane and Gyll Hall Lane should be moved eastwards by one field.</i></p> <p><i>The suggested amendment is shown on Map 2 (attached to our revised response to the Plan)).</i></p>	<p>The Joint Plan was updated to change the site boundary of MJP17.</p> <p>It is also recommend that detailed assessment of impacts on built heritage is produced by developers to support individual applications.</p>	<p>Revision site boundary of allocation MJP17 to exclude land nearest to Rudd Hall and Gyll Hall listed buildings.</p> <p>The revision was included in the Addendum of Proposed Changes and was subject to further consideration through the SA process (and supporting Historic Impact Assessment (HIA) and Strategic Flood Risk Assessment (SFRA) - see Sustainability Appraisal Addendum Proposed Changes to the Publication Draft (July 2017).</p>

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		<p>would not harm the significance of these designated heritage assets</p> <p>As a result, both the extraction of the mineral and the restoration is likely to harm the setting of these Listed Buildings. Therefore, in order to safeguard the setting of these buildings Site MJP17 should be amended as follows:-</p> <p>(1) The land to the south of Ghyll Hall Lane should be removed from the Allocation</p> <p>(2) The western extent of the Allocation lying between Leases Lane and Ghyll Hall Lane should be moved eastwards by one field.</p> <p>The suggested amendment is shown on Map 2 (attached to our revised response to the Plan)).</p>			
2	<p>Page 23 Appendix 5 (MJP21)</p>	<p>The site visit to Killerby has confirmed our concerns about the impact which mineral development in this location might have upon the Grade II Listed stable block to Killerby Hall. As a result we maintain our view that the Heritage Impact Assessment has under-scored the degree of harm that the development of this area would be likely to cause to this designated heritage asset. Having said that, however, we now are in a position to confirm that, in our opinion, extraction from this area is unlikely to harm the setting of the other designated heritage assets in the vicinity of this site.</p> <p>In terms of the Stable Block to Killerby Hall, the Heritage Impact Assessment which accompanied the Sustainability Appraisal considered that this site “forms an important part of the agricultural landscape context of the overall farm/hall complex, which is the primary</p>	<p><i>In order to reduce the harm to the setting of this building, the boundary of the site should be amended to remove the field to the south-east of the Listed Stable block from Site MJP21 as shown on Map 1 (attached to our revised response to the Plan)</i></p>	<p>The Joint Plan was updated to change the site boundary of MJP21.</p> <p>It is also recommend that detailed assessment of impacts on built heritage is produced by developers to support individual applications.</p>	<p>Revision of site boundary for MJP21 to exclude land nearest to the Killerby Hall Stable Block listed building.</p> <p>The revision was included in the Addendum of Proposed Changes and was subject to further consideration through the SA process (and supporting Historic Impact Assessment (HIA) and Strategic Flood Risk Assessment (SFRA) - see Sustainability Appraisal Addendum</p>

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		<p>setting of the building”. Although this could not be said to be true of the whole of this extensive Allocation, certainly this is the case for the field which lies to the south-east of this Listed Building. From the public footpath which runs along the northern boundary of this field the buildings at Killerby Hall and, especially, the stable block are extremely prominent. As such the view from this part of the site enables the Listed stable block to be appreciated in the context of the other historic buildings at Killerby Hall, the parkland surrounding these buildings, and within its wider rural setting. In the words of the NPPF and its definition of setting, we consider these views make a positive contribution to the significance of the stable block. That being the case, then the loss of this particular field and mineral extraction from it would, according to the scoring system used in the Heritage Impact Assessment, be likely to have a “Moderate Negative Effect” upon the stable block. Moreover, it does not appear from the Appraisal that this harm is capable of mitigation in a manner which, itself, would not harm the significance of this Listed Building. For example, screening would itself involve the introduction of a feature which is not typical of this particular landscape character and therefore cause harm to the setting of the Listed Building.</p> <p>As a result, both the extraction of the mineral and the restoration is likely to harm the setting of these Listed Buildings. Therefore, In order to reduce the harm to the setting of this building, the boundary of the site should be amended to remove the field to the south-east of the Listed Stable block from Site MJP21 as shown on Map 1 (attached to our revised response to the</p>			<p>Proposed Changes to the Publication Draft (July 2017).</p>

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		Plan)			
3	Page 31 Appendix 7 (MJP33)	<p>Having visited this site it is evident that, because of the topography and existing tree belts, mineral development from this area is likely to have little impact upon the heritage assets in its vicinity.</p> <p>The Heritage Impact Assessment which accompanied the Sustainability Appraisal concluded that the loss of this site and its subsequent development for minerals development would be likely to have a “moderately negative effect” on the significance of the Grade II* Listed Buildings at Kirkby Fleetham and the Grade II Listed Hook Carr Farmhouse.</p> <p>However, it is evident from the site visit that the degree of harm that mineral extraction might cause to these assets is actually likely to be far less than the Heritage Impact Assessment anticipated.</p> <p>Consequently, based upon the scoring system used in that document, we would consider the degree of harm no greater than a “minor adverse impact”.</p>	<p><i>Based upon the scoring system used in that document, we would consider the degree of harm no greater than a “minor adverse impact”.</i></p>	<p>Historic England’s site inspection included viewpoints beyond the Joint Plan Authorities due to access restraints (in this case it was considered appropriate to access the drive but walking around the grounds was not).</p> <p>Historic England’s comment is noted but the current assessment in the HIA ensures a precautionary approach is applied.</p> <p>It is also recommend that detailed assessment of impacts on built heritage is produced by developers to support individual applications.</p>	<p>Noted. No action taken.</p>

Table 2 - Minerals and Waste Joint Plan Sustainability Appraisal – consultation comments on Addendum of Proposed Changes to the Publication Draft (July 2017)

Ref	Section/page	Respondent Comment	Respondents Suggested Change	Joint Plan Authorities Response	Joint Plan Authorities Actions
Natural England					
1	General comment on Sustainability Appraisal for the Addendum of Proposed Changes to the Publication Draft Plan	Natural England welcomes inclusion of an updated Sustainability Appraisal with this consultation. We note that no updated Habitats Regulations Assessment has been included but are content that the proposed changes will not impact upon the conclusions of the Assessment. However we advise that the final version of the Habitats Regulations Assessment includes a note that these changes were considered in relation to the assessment.	<i>Revise final Habitat Regulation Assessment to consider Addendum of Proposed Changes.</i>	Comments noted.	Update Habitat Regulation Assessment to consider Addendum of Proposed Changes to the Publication Draft Plan. Proposed changes did not alter the conclusion of the HRA.
Friends of the Earth					
1	Chapter 6 Page 112	<p>Matter 2: The Sustainability Appraisal</p> <p>We see that the MPA has not amended the SA in accordance with our findings. North Yorkshire CC maintain the assumption that shale gas production could lead to carbon savings, an approach we find questionable especially when evidence continues to suggest the Government is not able meet the Committee on Climate Change’s (CCC) tests- as is required to justify shale production within current and future carbon budgets.</p> <p>The third of these tests state that “emissions from shale exploitation will need to be offset by emissions reductions in other areas of the economy to ensure UK carbon budgets are</p>	<p><i>We maintain the view that the MPA have failed to consider the CCC’s findings when scoring Policy MI6, especially the ‘reducing climate change’ objective with the SA. Impacts currently envisaged by the MPA (as a result of the policy’s implementation) include the following scores for the short, medium and long term:</i></p> <ul style="list-style-type: none"> • “minor/low level positive effects’ • “minor/low level negative 	<p>The consultation comments provided by Friends of the Earth are broadly consistent with their response on the Sustainability Appraisal Report to support the Publication Draft Plan.</p> <p>The SA seeks to predict the likely effects of the plan by ‘Identifying the changes to the environmental baseline which are predicted to arise from the plan or programme, including alternatives.....’⁵</p> <p>Generally domestic sources of shale gas are considered to have a lower carbon footprint than Liquefied Natural Gas (LNG) or the use of coal⁶. Therefore, the development of shale gas in the plan</p>	No action required.

⁵ ODPM, 2006. A Practical Guide to the Strategic Environmental Assessment Directive’ ODPM, London.

⁶ See DECC, 2013. Potential Greenhouse Gas Emissions Associated with Shale Gas Extraction and Use

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/237330/MacKay_Stone_shale_study_report_09092013.pdf

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		<p><i>met”.</i></p> <p>Hydraulic fracturing at any stage is not considered compatible within the framework of these tests planning decisions to permit development cannot by its nature secure a legal commitment to lower imports; carbon capture and storage is in abeyance; there is insufficient understanding of methane leakage from fracking activities at its different stage and subsidies for renewable energy generation have been scaled back. We maintain our original stance that the potential for any positive impacts resulting from Policy M16 is doubtful.</p> <p>Evidence clearly demonstrates that the approval of fossil fuel extraction merely adds to the amount of fossil fuels extracted and that there is no displacement.</p> <p>We therefore ask the council to reconsider the findings of the SA and amend accordingly. We would ask the council to reassess how these amendments to the scoring of the SA objective for M16 would affect the sustainability of the policy in its current form and whether further amendments — such as our suggested revisions —are needed to make it acceptable.</p>	<p><i>effects on the baseline”</i></p> <ul style="list-style-type: none"> <i>“Uncertain impacts of the objective on the baseline”.</i> <p><i>Assuming that the UK Government cannot meet the CCC’S 3 tests, and when additional factors such as methane leakage and the burning of the extracted hydrocarbon are taken into consideration, our view is that likely impacts for the ‘reducing climate change’ objective of policy M16 should actually be:</i></p> <ul style="list-style-type: none"> <i>“The option is predicted to have higher negative effects on the achievement of the SA objective. For example, this may include a significant negative contribution to an issue or receptor of more than local significance”</i> <i>“Uncertain impacts of the objective on the baseline”.</i> 	<p>area has the potential to replace more carbon intensive forms of energy and have what is considered a minor positive effect on the baseline. The SA Report acknowledges uncertainty on the wider climate change impacts of shale gas development, which can be impacted by a wide range of factors outside the scope of the Plan including national policy decisions.</p> <p>It is noted that the Committee on Climate Change (CCC) assessment⁷ has identified three tests that would need to be met to allow petroleum extraction on a significant scale to be compatible with UK carbon targets and this outcome is uncertain. However, as noted above, in line with guidance the SA seeks to predict the effects of the policy against the current baseline. Therefore the scoring of Policy M16 against the SA Objective 6 is considered robust.</p> <p>Furthermore, the Plan needs to be consistent with the national policy position, which supports hydrocarbon extraction, and therefore cannot seek to prevent such forms of development. However, the MWJP contains a range of policies which seeks to ensure that mitigation and adaptation to climate change is factored into decision making on minerals and waste development.</p>	

⁷ CCC, 2015. Onshore Petroleum. The compatibility of UK onshore petroleum with meeting the UK’s carbon budgets. <https://www.theccc.org.uk/wp-content/uploads/2016/07/CCC-Compatibility-of-onshore-petroleum-with-meeting-UK-carbon-budgets.pdf>

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Historic England					
1	General comment on Sustainability Appraisal for the Addendum of Proposed Changes to the Publication Draft Plan	We would agree with the assessment of the areas of the SA which would need some re-evaluation as a result of the Proposed Changes and, for those areas where it was considered that there was a need for some reassessment, in terms of the historic environment, we would agree with the conclusions regarding the likely significant effects which those proposed Modifications might have.	<i>None proposed</i>	The agreement with the updated SA (and Historical Impact Assessment) is noted.	No further action.

Contact us

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