



NORTH YORKSHIRE COUNTY COUNCIL, CITY OF YORK COUNCIL
AND NORTH YORK MOORS NATIONAL PARK AUTHORITY
MINERALS AND WASTE JOINT PLAN (MWJP)
EXAMINATION IN PUBLIC

RESPONSE TO INSPECTOR'S QUESTION NO. 63 AND IN SUPPORT
OF PREVIOUS REPRESENTATIONS MADE BY FRACK FREE RYEDALE
(FFR) (REF: 3684/0284/M17/LC.U)

MATTER 1: MINERALS

Issue: Whether the vision, objectives and strategic minerals policies seek to provide a sufficient supply of locally and nationally important minerals in an efficient and sustainable manner and whether the proposed allocations are the most appropriate

Question 63: Has sufficient consideration been given to the potential impact on the strategic road network from hydrocarbon development and are there any outstanding concerns from Highways England or the Highways Authority?

1. Introduction

- 1.1. FFR recognises that the MWJP should strike the right balance between planning for onshore oil and gas extraction and protection of the environment and residential amenity. FFR has engaged with the plan making process both through the submission of detailed comments at each consultation stage and in participating in Joint Scrutiny Committee Hearings to inform the policy formulation. FFR supports many of the Proposed Changes to the MWJP where they strengthen environmental and residential amenity protection, but consider that additional changes could be made to improve the soundness of the plan.

2. Accessibility and Transport

- 2.1. Policy M18 requires a Transport Assessment to demonstrate sufficient capacity within the road network, no unacceptable impact on local communities and safe and suitable access to the site. It promotes the use of underground pipeline to transport gas and discourages the bulk road transport of water.



2.2. FFR considers that this policy does not deal with the potential impact of transporting water to sites or waste water (flowback fluid) away from sites for treatment. Para 6.104 of the MWJP states:

'...if shale gas development becomes established on any significant scale in the area...there could be a potential for new arisings of waste from this source which, based on current information, would be generated within relatively rural locations in the eastern part of the Plan area where the majority of current PEDLs are located...'

2.3. The MWJP accepts that there are at present only a small number of existing facilities in and around the Yorkshire and Humber area which may be able to receive waste water from hydraulic fracturing activities (Para. 5.155). In the short to medium term therefore, if waste water arising from hydrocarbon developments cannot be treated on site, it will require transportation further afield, beyond the plan area, until such time that new facilities are established.

2.4. FFR understands that the operator at KM8 intended to carry out partial treatment of flowback fluid by electro coagulation on site. This was approved by the EA permit. However, they have subsequently agreed a different waste management plan with the EA to tanker the flowback fluid away. The reason being it was non-economic to treat on site and it is now proposed to be transported by road tanker off to a site outside of the County.

2.5. The MWJP has not been able to estimate the volume of likely waste streams resulting from hydraulic fracturing or the likely capacity of treatment facilities required. FFR understands that the likely treatment process will involve the settling out of solids and subsequent dilution of the flowback fluid. It is therefore likely that the required facilities will be large scale water treatment plants in urban areas outside the plan area, involving tanker transport by road.

2.6. It is noted elsewhere in the plan there is no provision for identifying any sites in the plan area where a suitable waste water treatment site may be located.

2.7. FFR considers that this issue has not been fully recognised within Policy M18. Applications should be required to explain where the waste streams (including flowback fluid) are to be treated, how they are going to be transported, in what volumes and proposed routes.

2.8. Evidence from the Preston New Road (PNR) site in Lancashire indicates that vehicle numbers are not insignificant. The Environmental Statement predicted an average of 90 two way HGV movements per day within a 16 to 18 month period covering



construction, well drilling, hydraulic fracturing, initial flow testing and decommissioning.

- 2.9. The scale of development of the shale gas industry within North Yorkshire is currently unknown. However each PEDL holder has agreed Work Programmes to implement within the PEDL area. A density of 10 pads per PEDL is envisaged in the MWJP, each with multiple wells. The potential scale of development would lead to large numbers of HGVs / tankers on roads within the County.
- 2.10. Should road capacity be insufficient, applicants are urged by the MWJP to explore highway improvements. The widening of narrow rural roads is not always possible, nor desirable in terms of changes to the rural character of an area. Any such road improvements will take time to construct and there will be adverse impacts on old hedgerow and field systems.
- 2.11. The wording of Policy M17 which refers to *direct* or *indirect* access to A or B roads does not add clarity. It implies the potential for more minor roads to be utilised rather than the strategic road network. Para 34 of NPPF directs that where developments generate significant movement, they are located where the need to travel will be minimised. It is proposed that the reference to indirect access should therefore be removed from the policy.
- 2.12. Policy M17 does not include a reference to highway safety. It is proposed that Part 1 i) a) should be amended to include a requirement to assess impact of developments upon highway safety. In addition, the supporting text should be amended to include the 'typical' required content of Transport Assessment Reports and Environmental Impact Assessment of Transport Reports. These should be produced in line with best practice, including an assessment of the impact of disruption arising from hydrocarbon developments on other road users, such as pedestrians, equestrians and cyclists; the impact on the rural character of the area; as well as noise and air quality effects.
3. Conclusion
- 3.1. FFR considers that the issue of HGV numbers, road capacity, and, in particular the transport of flowback fluid and other wastes, have not been properly recognised in the MWJP. Policy should be amended as suggested above.