

Elizabeth Ord LLB (Hons)  
C/O Carmel Edwards  
The Programme Officer  
North Yorkshire County Council Headquarters  
County Hall  
Northallerton  
North Yorkshire DL7 8AH.

9th February 2018

**Re: North Yorkshire Mineral and Waste Joint Plan**

My constituents have raised many concerns about the potential industrialisation of North Yorkshire, increased traffic and particularly heavy vehicles, which may have significant adverse impacts on narrow country roads, and noise and pollution emissions to air and ground and surface water. In September 2015, I visited Pennsylvania in the U.S. to understand more clearly the physical and environmental impact of exploration. I enclose a copy of my report for your attention. I am grateful to the officers and councillors at North Yorkshire County Council, the North York Moors National Park and City of York Council for their work and professionalism in compiling the Draft Minerals and Waste Joint Plan and for the many public submissions that contributed to its composition. I respectfully make the following formal submission to the Examination in Public:

**MIQ 56**

The Plan strikes the right balance to some extent, but I believe that additional safeguards and amplification of some points would ease concerns amongst the general public and provide greater clarity for producers, councillors and planning officers.

I welcome the Government's policy statement that there would be no surface activity for unconventional gas extraction in 'protected areas' (National Parks, AONB's, Protected Groundwater Source Areas, Scheduled Monuments, Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest). There should also be clear protections for the visual impacts on these protected areas, namely buffer zones.

Hydrocarbon development should only be permitted in suitable locations and where there is clearly defined direct or indirect access to classified 'A' or 'B' roads and that access to the sites are appropriate to the volume and nature of any road traffic.

I believe that there are gaps and inconsistencies in the draft plan that would potentially allow inappropriate development.

Specifically:

Policy M 17 1)

the word “indirect” does not meet any objectively assessed requirement and should be qualified by a maximum distance from an ‘A’ or ‘B’ road.

Policy M 17 2) fails to control the cumulative impact of an increasing number of well pad sites.

The plan should state unequivocally that development will be limited to 10 well pads per 100/sq. km. and that the density restrictions apply specifically to non-protected areas and buffer zones; i.e. that there are no more than 10 well pads per 100 sq. km. in non-protected areas and associated buffer zones. If this were not the case, development could be much more heavily concentrated in locations outside protected areas.

### **MIQ 60**

I fully support the proposal within the plan for a 3.5km buffer zone around protected areas and therefore am concerned that Policies M 16 b) (i) and d) (i) are inconsistent b) (i) an absolute prohibition on surface development involving hydraulic fracturing in National Parks, AONB whilst d)(i) potentially allowing it subject to a detailed assessment to support an application.

The wording at d)(i) should be replaced with: Permission will not be granted for proposals within a National Park and/or AONB or associated 3.5 km buffer zone where they would have an adverse impact upon the special qualities of the designated areas and/or their setting or are incompatible with their statutory purposes in accordance with Policy D 04.

### **MIQ 61**

Separation distances specified (5.146) should also provide for minimum distances from schools and medical establishments, a minimum of 1.5Km from any settlement of three or more dwellings would be more appropriate at this stage and 500m of one or two isolated dwellings or other sensitive receptors until more evidence on the amount of industrial activity and environmental impact is available. This will provide additional protections from any potential adverse impacts of noise, light pollution, emissions to air or ground and surface water.

### **MIQ 62**

Yes. Policy M 18 should be strengthened to make sure that the potential costs of remediation, site restoration and aftercare are covered in the event that the PEDL licence holder is not able or unwilling to meet their obligations. The word “may” should be replaced by “will”.

I trust you will consider this and other submissions carefully, particularly as this plan may well provide the foundation for similar policy documents in other local authority areas.

Kevin Hollinrake MP