





Minerals and Waste Joint Plan



Site Identification and Assessment Methodology and Scope

Summary of Consultation Findings (Spring 2014 Consultation) and Results of Compatibility Check with October 2014 changes to Waste Planning Policy and Guidance

January 2015

City of York Council North York Moors National Park Authority

North Yorkshire County Council

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Introduction

As part of the Joint Plan preparation process there arises a need to consider the potential to identify specific sites and/or areas, for the management and extraction of minerals and the management of waste, and to assess those sites for their suitability for inclusion in the Joint Plan. To this end the Joint Plan Authorities of North Yorkshire County Council, the North York Moors National Park Authority and City of York Council consulted on a methodology setting out how sites would be identified and assessed in spring 2014.

The draft methodology sought to support the identification and assessment of sites for minerals and waste development and areas (including preferred areas and areas of search). As such it set out 4 steps to identify and appraise sites and areas for possible inclusion in the Joint Plan. These steps were:

- Step 1: Identification and initial screening of potentially suitable Sites and Areas;
- Step 2: Identification and mapping of key constraints;
- Step 3: Initial sustainability appraisal of Sites and Areas;
- Step 4: Panel review of initial SA findings

Evidence gathered to date on key constraints was also included as an appendix to the methodology and a number of constraints were mapped on an interactive web map.

The draft methodology built on earlier work to define how sites world be identified and assessed. During work in 2011 towards preparation of Minerals and Waste Core Strategies, North Yorkshire County Council developed initial site selection methodologies for minerals and waste, which were subject to consultation. Following the decision early in 2013 to move to preparation of a Minerals and Waste Joint Plan, those methodologies have been reviewed and revised and an initial draft methodology for the identification and assessment of sites in the Joint Plan was discussed at workshops in June 2013 and issued to technical stakeholders in July 2013 for their comments. The findings of this earlier consultation can be viewed in a separate consultation outcomes report (see

https://www.northyorks.gov.uk/planning-and-conservation/planning-policy/planning-policy-minerals-and-waste/minerals-and-waste-joint-plan/sustainability-appraisal).

The spring 2014 consultation was a chance to present the revised methodology for further scrutiny by a wider audience. To this end, the document was placed on the North Yorkshire County Council website and promoted as part of the wider consultation on issues and options on 14 February 2014 with the deadline for comment on 11 April 2014. A consultation questionnaire was also issued to help structure the comments of those who wished to respond in this format. A list of the questions asked in the consultation questionnaire is included at Appendix 1.

Since the spring 2014 consultation the Government has updated the planning policy and guidance in relation to waste development through the publication of a new National Planning Policy for Waste and updated Planning Practice Guidance for Waste.

This report sets out how the consultation findings, taken together with a review of new planning policy and guidance, have resulted in refinements to the Site Identification and Assessment Methodology.



Figure 1: Site Assessment work will involve both desktop analysis and field assessment¹

Who responded to the consultation?

A total of 18 responses were received across a range of formats, including responses made as part of wider Joint Plan responses. Figure 2 shows the range of ways that consultees responded.

¹ Photograph credit: North Yorkshire County Council



Figure 2: Formats by which Consultees Responded

Consultees also represented a variety of interests. Figure 3 shows the makeup of respondents.

Figure 3: Make-up of Consultees that Responded to the Consultation



Comments on identifying and screening sites

The first two questions in the accompanying consultation questionnaire related to the way in which sites are identified and screened. Several consultees made comments on these issues.

Type of Comment	Number of responses in all formats that raised the issue
Landowner support is fundamental to the deliverability of sites.	1
Human population constraints would be difficult to identify	1
without knowing the development that would take place at a	
site.	
Clarification needed on what will be identified in relation to	1
development planned at a site	
Agree with the site identification principles and screening	1
questions	
Do not wish to add to the showstoppers listed in the screening	2
questions	
Site MJP14 Manor Farm is a showstopper due to proximity to	2
archaeological sites / historic environment / other	
environmental and social constraints.	
Proposals in National Parks or AONBs should be removed	1
Local groups and statutory bodies will have additional data	1
sources to consider	
The findings of Step 2 should be published for scrutiny	1

SSSIs are an overriding environmental constraint to be	1
considered at step 1.	

Other constraints and opportunities

Question 3 asked if consultees could think of additional constraints and opportunities or other information that should be added to the information gathering stage of the methodology (Step 2).

Type of Comment	Number of responses in all formats that raised the issue
It is not clear what 'built development' means	1
It is unclear why anaerobic digestion facilities fall within the heading 'material assets and resources'.	1
Citations / information sources on heritage assets should be consulted	3
The assessment process should understand that constraints are not absolute	1
Blast zones (e.g. around chemical sites) should be included as a constraint	1
Consider whether sites are within 200m of ancient woodland / Living Landscapes / Local Wildlife Sites	1
Support inclusion of land instability as a constraint	1

Appraising and validating sites

Steps 3 and 4 of the assessment methodology showed how sites would be appraised using a sustainability appraisal framework and how a panel would be assembled to validate findings. Questions 4 and 5 asked questions about these areas.

Type of Comment	Number of responses in all formats that raised the issue
Objective 8 asks a number of questions pertaining to how waste would be managed at a site when most sites will not be	1
allocated for a specific waste management use.	
Other issues such as whether secondary, synergistic or cumulative would be difficult to address without assumptions being made about the nature for facilities that would occupy allocations.	1
Important to apply professional judgement consistently when scoring.	1
The panel should be aware of what actually happens currently at sites	1
Suggestions relating to who should attend the panel	3
Sites with extant planning permissions should be allocated	1
Some waste management sites are acceptable in the	1

greenbelt	
The referencing of sites should be changed	1
Site MJP14 has been the subject of productive archaeological	1
digs	
Allerton Waste Recovery Park should be allocated as a	1
strategic site on the basis of information supplied in the	
Environmental Statement	
Deliverability should be consistent with national definitions /	1
guidance (e.g. in NPPF / GP3 / environmental permitting	
guidance)	
Engagement with developers at step 3 would be desirable	1
Sites next to biodiversity assets may have different levels of	1
impacts	
Consideration should be given to consumptive extraction	1
licenses or inefficient processing technology	
Proximity to the strategic road network is helpful indicator	1
A question should be added 'is the developer intending to	1
make best use of the extracted minerals through investment in	
appropriate processing technology?'	
A question should be added 'is any advanced planting being	1
promoted by the developer?'	
Consider impacts on right of way	1
How will sites be ranked?	1
Sites restored to water have negative impact / impact on	2
landscape	
Consider potential for waste sites to sterilise minerals sites	1
Sites should be on the lowest grade agricultural land	1
Should not just consider noise and dust in relation to clusters	1
of population – can affect isolated individuals	

Other comments

Type of Comment	Number of responses in all formats that raised the issue
Broadly support the methodology	3
New areas of search can be identified to steer development away from areas that have reached capacity	1
Do not support the importing of waste	1
Support exporting hazardous waste	1
Known potential locations should be safeguarded	1
Support identification of minerals sites for waste development	1

Amending the Site Identification and Assessment Methodology in response to comments

As a result of this consultation we have made several changes to the methodology. In particular, key changes have been made in the following areas:

Identifying sites and constraints and opportunities

Some points related to a need to clarify aspects of how constraints will be considered. For example there was some uncertainty over the consideration of the human environment. Where necessary we have added text to the methodology to clarify this. We have also added some additional constraints / evidence to step 2 in response to suggestions.

Appraising and validating sites

Most comments related to the appraisal process. To address these points we have implemented a number of changes, including:

-Changes to the wording of the assessment questions and limitations section to reflect the fact that the end use of sites cannot be known at the plan production stage;

- Acknowledgement that the Health and Safety Executive should be invited to attend panel sittings;

-Clarification that receptors for impacts, including noise and dust, are not limited to centres of population;

-The addition of questions to the site SA framework relating to the strategic road and rights of way network.

The full list of comments and the reaction to them is set out at Appendix 2.

New National Waste Planning Policy and Guidance

In October 2014 the Government published a new National Planning Policy for waste which replaced the former Planning Policy Statement 10. At the same time the Government's Planning Practice Guidance was updated to deal with waste. To ensure that the Site Identification and Assessment methodology remains consistent with the national direction of waste planning policy an exercise to compare the methodology with this guidance has been undertaken.

This review found that broadly the methodology remains fit for purpose. In particular, checks in relations to paragraphs 4 and 5 of the National Planning Policy, which refer to identifying suitable sites and areas, reveal that this methodology, when seen as part of the wider plan preparation process, including the evidence gathered, is broadly consistent with National Planning Policy. However we have noted the changed emphasis in the National Planning Policy and its approach to waste development in the Green Belt. This states that:

"Green Belts have special protection in respect to development. In preparing Local Plans, waste planning authorities, including by working collaboratively with other Planning Authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. Local planning authorities should recognise the particular locational needs of some types of waste management facilities when preparing their Local Plan". To acknowledge this change we have distinguished the different approaches taken to minerals and waste related development in the Green Belt in the methodology in line with the new approach for waste.

We have also noted two key areas of more specific relevance to site identification and assessment; one in the National Planning Policy relating to locational criteria for testing suitable sites and areas, and one in the National Planning Guidance relating to the sustainability appraisal of waste plans. Appendix 3 of this report cross checks the locational criteria listed at Appendix B of the National Planning Policy with the Site Identification and Assessment Methodology, while Appendix 4 cross checks the sustainability appraisal topics suggested for waste plans in the National Planning Guidance with our Methodology. Where gaps in the Methodology have been identified these have been recorded, and the Methodology has been amended to address the gaps.

Appendix 1: Consultation Questions Asked

- Do you agree with the means by which sites may be identified and the broad screening questions?
- Are there any types of absolute 'showstoppers' to a minerals or waste development which we have not identifies in the broad screening questions?
- Can you think of any additional constraints or opportunities or any other additional information that we should take into account (including mapped or written information or information that could reasonably be collected through visiting sites?)
- Do you have any comments on the site SA Framework (at appendix 1)? Are we asking the right questions of each site?
- Do you agree with the approach set out for consideration of sites by a specialist panel? Are there other things the panel should take into account?
- Do you have any further comments on this Site Identification and Assessment Methodology and Scope Paper?

Appendix 2: Responses to Questions asked during Consultation on the Methodology

Site Identification and Assessment Q1: Do you agree with the means by which sites may be identified and the broad screening questions?

Respondent Reference	Comment	SA Team Comments
SiteIDScope003 Peel Environmental Limited	Comment In relation to Table 1: - It is considered that general landowner support for a proposal is fundamental to the deliverability of a potential site within a relevant timeframe and we agree that this should form one of the broad screening questions for sites; - The point relating to major human population constraints indicates that the council will take into account constraints to certain 'development types'. However, it is set out within the limitations of the plan on (page18) that the plan would not be identifying specific developments that would be suitable on sites. Human population provides a greater or lesser constraint to the delivery of different types of waste management development and as such greater clarity would need to be provided as to what the specific human population constraints actually comprise. It is simply not appropriate to specify an off-set distance as this would vary depending upon waste management facility and could result in sites that would be suitable for some waste management facilities being excluded Finally it is not clear what is meant by 'development type', and therefore further clarification would be beneficial on this element. In relation to table 2: Key constraints / opportunities to be mapped, it would assist if the term 'built development' was clarified further as not all 'built development' would be sensitive to waste management or mineral development. Furthermore, it is unclear why 'anaerobic digestion facilities' are identified within the table under the heading of 'material assets and resources' surely they would fall within the 'existing active / dormant minerals sites and waste sites' criterion.	The limitations section highlights that the allocation of a site does not necessarily mean that a development of as yet unknown design or format, as defined by a planning application, will be suitable on that site. The suitability of specific developments will be assessed through the planning process including Environmental Impact Assessment where required. Sites will, however, be allocated with certain broad purposes/uses stated, so the respondent is correct to state that off-set distances are not appropriate, and we have not attempted to do this. However, we do need to assess whether such uses are suitable in principle through this site assessment process. For the consideration of human population constraints at step 1 this will comprise human receptors that would make a particular site undeliverable, as step 1 is a coarse screening step (to screen out show stoppers), and further more detailed assessment follows in later steps. Obviously these constraints

		will vary markedly between categories of development, so we are unable to create a definitive list of constraints in a document such as this, and at step 1 will rely on professional judgement to determine whether such a constraint is likely to curtail the development potential of the site. <u>We will, however, add a</u> <u>footnote to the methodology to help</u> <u>clarify this.</u>
SiteIDScope005 York Potash Ltd	Yes, York Potash agrees with the approach as outlined and the questions to be considered.	Comment noted.

Site Identification and Assessment Q2: Are there any types of absolute 'showstopper' to a mineral or waste development which we have not identified in the broad screening questions?

Respondent Reference	Comment	SA Team Comments
SiteIDScope001 Individual (Identity protected)	The showstopper should be site ref: MJP14 Manor Farm West proximity to archaeological sites (see other comments).	The presence of archaeological sites nearby is not considered to constitute an absolute showstopper to development. Nearby archaeological sites will be identified in step 2 of the process and assessed further in steps 3 and 4. The reference to an archaeological site near MJP14 will, however, be investigated when undertaking site assessment, so thank you for pointing this out.
SiteIDScope003 Peel Environmental Limited	None	Comment noted.
SiteIDScope005 York Potash Ltd	There are none which York Potash has identified.	Comment noted.
SiteIDScope007 Individual (Identity protected)	Please see any other comments section.	Comment noted.

Site Identification and Assessment Q3: Can you think of any additional constraints or opportunities or any other additional information that we should take into account (including mapped or written information or information that could reasonably be collected through visiting sites?

Respondent Reference	Comment	SA Team Comments
SiteIDScope003	In relation to Table 3: Key (non-mapped) desktop sources to be used when	Agree. In order to assess the impact that
Peel Environmental Limited	identifying constraints and opportunities, it would be beneficial if the 'cultural	a development would have upon a
	heritage and historic environment' sub section also makes reference to the	historic/heritage feature, it will be
	citations for listed buildings and other heritage features. At the present time the	necessary to refer to the citation and
	methodology only seeks to identify the location of heritage features. However,	therefore this will be added to Table 3.
	many of these assets have specific characteristics (set out in the citation) that	
	would not be a constraint to development of a neighbouring site. This is	
	therefore an important consideration of non-mapped constraints to a	
	development sites.	
SiteIDScope005	No, the number of constraints shown in tables 2 and 3 cover all the required	Comments noted. The constraints are
York Potash Ltd	topics. The Assessment process should understand that the constraints are not	not absolute, and are considered for
	necessarily absolute.	their significance when taken together at
01/170		steps 3 and 4.
SiteIDScope010	In relation to consultation question 3, it may be useful to consider blast zones	The HSE PADHI system, combined with
Selby District Council	(e.g. surrounding chemical works) when mapping information to consider	consultation with HSE where necessary,
	potential sites as these may restrict development at certain locations.	will be used to ensure sites are within
		safe working distances from potentially
		hazardous locations.

Site Identification and Assessment Q4: Do you have any comments on the site SA Framework (at appendix 1)? Are we asking the right questions of each site?

Respondent Reference	Comment	SA Team Comments
SiteIDScope003	Appendix A - First Point - With regard to Appendix A we do have some	Appendix A- First Point – The aim of
Peel Environmental Limited	specific concerns regarding the questions to ask for each site in proposed	the questions referred to is to establish,
	sustainability objectives 8 and 9. These state: Is the site allocated for the	if allocated, the broad purpose that a
	recycling or re-use of minerals or waste? (Objective 8); Is the site allocated for	potential site would serve. The wording
	a purpose that is likely to move waste up the waste hierarchy (thereby reducing	of these questions will therefore be
	demand for future virgin materials (objective 8); Is the site allocated for a	changed to words akin to 'Would the site
	purpose that is likely to move waste up the waste hierarchy (waste sites only)	be allocated for a purpose likely to
	(objective 9). We do not consider that it is appropriate to include these	facilitate'
	questions in the scoring of potential sites. The majority of sites being	
	considered in the site identification document will not already be 'allocated' for	Appendix A- Second Point- The plan

any particular waste management use, unless the site in question is already allocated for such a use in an existing development plan. Surely this would put the new sites that are being brought forward at a distinct disadvantage to the existing sites when scoring is carried out. These questions should therefore be removed from the assessment of sustainability objectives 8 and 9. Appendix A - Second point - As identified in the limitations sub section (pages 17 and 18 of the methodology), it is acknowledged that the site assessment is aiming to identify a range of sites that would be suitable for allocation. However, it is clear that the Council is not seeking to identify the types of development would be suitable on each site. This approach would make it very difficult to respond to a number of the questions (set out in table 4 and within Appendix 1) as each type of waste management facility operates in very different manner and has the potential to give rise to different environmental effects. For example, one of the questions set out within table 4 (form for recording the panel comments) asks 'are there any secondary, synergistic or cumulative effects associated with the development of the site? How significant are these? It is difficult to see how the council could answer these questions without making some assumptions regarding the facilities that would be likely to occupy specific sites? This would similarly apply to a number of questions within Appendix A (e.g. question 4 askes 'is the type of operation at the site, or level of traffic likely to cause air pollution?) General Observation - As a more general point, we do have concerns about the use of a scoring system for the assessment of sites even if this is based on the scoring mechanism contained within an SEA. In adopting this approach care should be taken by the council in the weight to which they attach to the scoring of each sustainability objective. One objective may get a very negative score but in the overall consideration of a particular s	 would broadly identify the range of categories of development that are suitable at a certain allocated site and environmental effects will be assessed accordingly. While this could be relatively specific for minerals sites, we accept that it may be quite broad for waste sites. We agree that in some cases it may be difficult to ascertain environmental effects with any certainty, though in other cases there may be a high likelihood of an environmental effect, such as if site is located on a protected site or is likely add to traffic problems without mitigation. However, in other cases we are likely to record that there is merely some potential for an effect to occur if development proceeds in a certain way, or that the effect is unknown until more is known about the detail of a development. We will add some additional text to the limitations section to this effect. It should also be noted that not all questions will be relevant to each site. General observation – we agree that professional judgement and transparency in how judgements were arrived at is of paramount importance. We will clearly set out how judgements
	were arrived at when we next consult on this area of work during the preferred options consultation.

Site Identification and Assessment Q5: Do you agree with the approach set out for consideration of sites by a specialist panel? Are there other things the panel should take into account?

Respondent Reference	Comment	SA Team Comments
SiteIDScope001 Individual (Identity protected)	The panel should be aware of actual happenings (see other comments).	Comment noted.
SiteIDScope003 Peel Environmental Limited	See second point on Appendix A in response to Q4 above which also includes reference to Table 4.	See SiteIDScope003 response to Q4 above
SiteIDScope005 York Potash Ltd	It is recommended that where deep mining or deep mineral extraction is proposed the panel should include a member of Her Majesty's Inspectorate of Mines so that their professional expertise can be brought to bear. This person would be able to advise on the deliverability of different aspects of mining – particularly the constraints to shaft sinking presented by faulting, depth and gas but also the distances relating to ventilation. Advice can also be provided on issues such as subsidence and blasting effects.	Comments noted. Her Majesty's Inspectorate of Mines is part of the Health and Safety Executive. <u>We will</u> <u>consult HSE on the findings of the site</u> <u>assessment process.</u>

Site Identification and Assessment Q6: Do you have any further comments on this Site Identification and Assessment Methodology (SIAM) and Scope Paper?

Respondent Reference	Comment	SA Team Comments
SiteIDScope002	Where planning consent has been granted a comprehensive assessment of	Extant planning permissions will not be
AmeyCespa	the constraints and impacts has taken place and concluded the proposed	allocated as we would not wish to be
	development is acceptable at that location. If such a site is operational they	reliant on decisions made under
	should be protected as safeguarded sites, however in the event development	previous policy frameworks, and would
	has not commenced, the site must be allocated within emerging Plan as	prefer all future sites to be considered on
	suitable future location for the permitted waste management activities. The Site	the merits identified by this Site
	identification process should take account of these circumstances and allocate	Identification and Assessment
	sites that have an extant planning consent and are yet to be implemented.	Methodology (SIAM).
SiteIDScope003	We note that Green Belt is identified as a specific constraint within Table 2 of	We can confirm that the constraints and
Peel Environmental Limited	the Plan. Whilst we agree with the Council that waste management	opportunities presented in table 2 will be
	development would be 'inappropriate development within the Green Belt and	considered on a site by site basis and do
	very special circumstances would need to be demonstrated for a facility to	not necessarily constitute absolute
	come forward in such locations, this should not be used as an absolute	constraints. It is noted on page 12 of the
	constraint (showstopper) to the allocation of sites for waste management within	Site Identification and Assessment
	the development plan. It must be recognised that certain types of waste	Methodology that 'not all constraints or
	management facility (composting and anaerobic digestion facilities) are in fact	opportunities apply in equal ways to
	more suited to rural locations and given the need for many to be in close	minerals and waste development. For

	proximity to waste arisings or the lack of suitable available sites elsewhere, it is often necessary for them to come forward within the Green Belt. This should be made clear and taken into consideration when the professional judgement is applied by officers in the allocation of sites.	instance, different national policy approaches to the consideration of green belt apply to minerals and waste development, while physical differences between development types may have varying effects on constraints.'
SiteIDScope007 Individual (Identity protected)	Sites would more easily be identified by the public were they each to be given a separate site ref. I refer specifically to site ref MJP14 which is 2 extensions to existing quarry at either end and opposite sides of the river. Clarity and transparency would then be achievable.	This comment has been forwarded to the Plan team.

Site Identification and Assessment: Any other comments?

Respondent Reference	Comment	SA Team Comments
SiteIDScope001 Individual (Identity protected)	Site ref: MJP14. Manor Farm West: 1. This site has been subject to specialist archaeological digs and found to be productive; 2. This site is 50 yards from the old East Tanfield Village; 3. This site is also very near the Southern Henge. The respondent also raised a number of specific issues.	Comments noted.
SiteIDScope002 AmeyCespa	Within their evidence base, we consider that the Council should take account of a strategic waste management proposal (Allerton Waste Recovery Park) that AmeyCespa received planning consent for on the 14th February 2013. The planning consent for AWRP follows the award of the 25-year Private Finance Initiative Residual Waste Treatment Contract by York and North Yorkshire Waste Partnership to AmeyCespa. This strategic proposal will primarily manage municipal waste from North Yorkshire and the City of York well beyond the Plan period and incorporates; mechanical treatment, anaerobic digestion, energy from waste, incinerator bottom ash processing plant and a visitor and education centre. The planning application documents consider in great detail the need and suitable locations for strategic waste treatment facility(s) within the Plan area. These documents support the need and suitability for AWRP to be allocated as a Strategic Facility within the Core Strategy. An additional set of planning application and Environmental Statement documents accompany this submission. To assist the council in identifying AWRP as a strategic allocation, please find enclosed a site pro forma and location plan.	Extant planning permissions will not be allocated as we would not wish to be reliant on decisions made under previous policy frameworks, and would prefer all future sites to be considered on the merits identified by this SIAM.
SiteIDScope004	We have reviewed this document and we are pleased to see that both flood	Comments noted. The highlighted
Environment Agency	risk zones and source protection zones are identified as potential constraints	documents will be taken into

SiteIDScope006 Yorkshire Wildlife Trust	on minerals and waste proposals. Also, we have previously commented on this methodology in July 2013. We advise that NPPF is referred to in order for the site assessment panel to determine if a proposed site is deliverable with regards to the level of flood risk posed. We advise that our GP3 document is referred to in order to determine if a proposed site is deliverable with regards to groundwater protection. GP3: https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3 We advise that you refer to our 'Guidelines for developments requiring planning permission and environmental permits (England)' document, and in particular Appendix 1 which states what locations would be deemed unacceptable for certain types of waste facilities from an Environmental Permitting viewpoint, and therefore from a planning perspective, as we would object to any facility which requires a permit from us that is unlikely to be able to obtain one. The link below takes you to our guidance document: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297009/LIT_7260_bba627.pdf The Trust has done a very brief GIS exercise, provided with this response as an Excel document, to show which sites are within 200 metres of Ancient Woodland, the Trust's Living Landscapes and Local Wildlife Sites. Further work of this type will give an excellent guide to what type of restoration would be happy to work with the authority and provide further input of this type. At present a large proportion of the sites do not have any suggested restoration.	consideration during the site assessment process as guidance for assessors. In addition, the document <u>'Guidelines for</u> <u>developments requiring planning</u> <u>permission and environmental permits</u> <u>(England)' will be added to Table 3.</u> Comments noted. Step 2 includes all the GIS layers cited so these will help to inform the context to each site, including what the predicted effects could be and whether there may be opportunities to link restoration with the local landscape context (including biodiversity opportunities where appropriate)
	In order for the authorities to plan for connecting up habitat as required by the NPPF it would be appropriate for sites to provide more information on the restoration proposed and for the authorities to give guidance as to what BAP habitats would be most valuable. [A copy of Yorkshire Wildlife Trust's 'Interim Research: The Development of Draft Biodiversity Targets Arising from Mineral Extraction in the Yorkshire and Humber Region Draft Report" was also included.]	opportunities where appropriate). <u>We will add the research document cited</u> <u>to table 3 (non-mapped desktop</u> <u>sources).</u>
SiteIDScope007 Individual (Identity protected)	Re: site ref MJP14 Manor Farm West. MJP14 Manor Farm West should be rejected from the sites for consideration at this early stage due to the following reasons: This is practically the only landscape left between the River Ure and Medieval Village of East Tanfield and the Southern Thornborough Henge. The current proposals for additional large-scale mineral extraction, if given the go-	Comments noted. The site that you refer to, along with all other submitted sites will be assessed using the four step process outlined in the Site Identification and Assessment Methodology. This

ahead, would result in the quarrying out of the surviving landscape which surrounds the henge monuments. The history of the Thornborough landscape began after the retreat of the glaciers around 12,000 years ago. Transient Mesolithic groups moved across the landscape, as evidenced by scattered flint artefacts. The Deserted Medieval Village of East Tanfield is located just to the south of the monument complex. The complex has therefore formed an important focus to its surrounding landscape since its initial creation some 5000 years ago. The remainder of the land has been and is being destroyed by existing quarying. Gravel extraction has had the most marked impact upon the physical landscape and its archaeological resource. However large scale gravel extraction has increasingly become a feature of the landscape and has gradually taken up more of the area of the landscape surrounding the henges. The little that is left of the settings of our heritage needs to be preserved for future generations to enjoy. We saw for ourselves, in the early 1990s, hundreds of huge notched timbers which were unearthed from beneath the gravel and subsequently destroyed by quarry operators in the existing quarry. The prehistoric peoples would have probably been making their way to the Henges from the river through the now quarried area. In the proposed site area, ancient artefacts have been found nearer medieval village. The comment from the Thornborough to the Hutton and Norton enclosures is going to be lost forever if the quarrying is extended. The Ure Valley between the two proposed site extensions has been totally altered in character, by quarrying, from the great fertile lowland it has been for generations. The map provided does not properly show the extent of quarrying. The whole area shown as white, marked Bellfask, has been and is being currently quarried. This needs to be seen from the bank to be appreciated rather than from in the quarry. Jobs are created by quarrying for the life of the quarry but agricultural jobs are lost i	assessment process will consider a wide range of constraints/opportunities present at each site and this will include consideration of the issues that you have raised in relation to this site. In our assessment table (to be used at step 3) we consider noise and dust, alongside a variety of other constraints (including the historic environment and biodiversity). While the assessment inevitably looks for receptors to this dust and noise, the presence of individual properties and other receptors such as footpaths will be noted. Elsewhere (in our SA scoping document) we have referred to sources, pathways and receptors for impacts, and <u>we will</u> <u>include a reference to this (in a footnote to the site SA Framework) and an</u> <u>explanation of receptors for different impacts in this document so that the document does not give the impression that only towns and villages can be impacted by development.</u>
food production. This area is losing its ability to respond to climate change due to the vast areas under quarrying.	

SiteIDScope008 Lightwater Quarries Limited	 pumped out in this way and no measurement of the amount. Even on existing quarries a regulation should be brought in to be independently and constantly measure extraction to the Environment Agency or Yorkshire Water. Reliance on spasmodic testing of borehole levels takes no account of wasted water. Furthermore, the borehole levels even when returning to a level have actually taken water from elsewhere to do so. Excessive dewatering has an effect on the surrounding land and properties. It causes houses and walls to crack and it dries up the wells. There is no mains water to any property above the site area. The Joint Plan seems to imply that it is only important for town and village clusters of population to be protected from noise and dust produced by quarries. I would ask the plan to consider that even one person should be entitled to that protection. The extra noise for the plant -head and machinery would raise the levels further. The tests made by the quarry are usually just under the permitted levels and obviously would then be over the limit. In this quarry all traffic was intended to stay south of the river or go across the river ford from the plant-head on the south to the north. From December 2013 when quarrying was further extended north west to the border of the proposed site, quarry traffic has been using this minor West Tanfield to Wath road on a regular basis. Large oil tankers to fill the machines and many vans have been causing a risk on the tiny road. The problem would be made worse by another extension. Animal habitats and their usual paths have already been vastly disrupted by the huge area under quarrying. The ancient oak with its wildlife diversity has gone and the original badger set is a lake now. 1) We write with reference to the Minerals and Waste Joint Local Plan Consultation which is currently on deposit until 11 April 2014. This email specifically relates to the Site Identification and Assessment Methodology of the negular to the site denergine meth	1. Comments noted 2. The assessment methodology is designed to deal with a wide range of
	the consultation. 2) The selection methodology is presented across a clear four	designed to deal with a wide range of
	step process which is akin to other methodologies seen from other MPA's. Step 1 is a well-defined screening step, but doesn't reflect the clear policy	sites of varying scale for both minerals and waste. While it is correct that the
	position defined in the main consultation document, of no new extraction of	NPPF requires great weight to be given
	minerals from within an AONB or a National Park. In respect of questions 1 and 2, the methodology should clearly be redefined to remove such proposals	to conserving landscape and scenic beauty within the National Parks and
	from the allocation process at this early stage. Such an approach is entirely	AONBs, and to, as far as is practicable,
	consistent with National policy. 3) Step 2 is recognised as a data gathering	provide for the maintenance of non-
	phase to place the proposed allocations/sites in appropriate context. In	energy minerals outside these areas, the



	Agency and Yorkshire Wildlife Trust both identified additional documents/data sources in their consultation responses to the Site Identification and Assessment Methodology (see responses SiteIDScope004 and SiteIDScope006 above) which will be taken into consideration.
	4. A report of the findings of the further steps will be published alongside the preferred options consultation. Consultation questions will allow consultees to challenge any aspect of our assessment and we will revise findings at any of the 4 steps where a valid case is made to revise them. A finalised report following the consultation will also be published.
	5. Comments noted. Consultation at preferred options will allow developers to suggest amendments.
	6. Heading 1-The point relates to one biodiversity asset (perhaps one created through restoration) impacting on another. We feel that any problems here would already be picked up by the questions to ask of each site, which are sufficiently broad to capture such issues – e.g. 'is the site likely to result in the loss or deterioration of irreplaceable habitats?'
	Heading 2- The purpose of the site assessment process is to consider the suitability of a site for a certain range of

types of development rather than a
specific proposal and this level of detail
would not be known at this stage.
Heading 3-Agree. We will add the
guestion 'is the site proximal to the
strategic road network?'
Heading 8 and Heading 11- The purpose
of the site assessment process is to
consider the suitability of a site for a
certain range of types of development
rather than for a specific proposal.
Details such as advanced planting and
the specifications of the processing
technology are factors that would be
considered as part of a planning
application for a specific development
and it is therefore not considered
appropriate to include these indicators a
this stage. We do however note that concepts such as advance planting
demonstrate that a range of mitigation
measures can be employed to overcome
impacts. We have included a question in
the panel assessment form to highlight
the possible scope of mitigation.
Heading 14-Agree. We feel that the
existing framework does not fully capture
impacts on rights of way so we will
change the wording of the question
relating to access to recreation, leisure
and learning to 'would I the site if
allocated / developed reduce access to /
detract from the experience of
recreation, leisure and learning
opportunities including public rights of

		way?'
SiteIDScope009 Natural England	Impacts on SSSIs should be identified as an overriding environmental constraint in Step 1, Stage 2. At Step 4 – Panel Review – In addition to formal advice on consultation drafts Natural England can provide further advice at this stage, however, due to current resources, attendance at specific sessions will be dependent on the site discussed, its nature conservation site/protected species interest and the potential harm to that feature.	The purpose of step 1 is merely to undertake a coarse screening assessment so that sites are not needlessly considered in steps 2 to 4. While we accept that SSSI are designations of national importance, so too are many other designations, so to consider them all would make the initial screening too unwieldy a process. SSSIs and other national constraints are captured at steps 2 and 3.
SiteIDScope010 Selby District Council	It is still not clear how the panel will make an overall decision on a site. Are some issues (i.e. biodiversity) to be ranked / scored higher than others in terms of their potential negative impacts? If one issue is considered to be an absolute negative, yet others perform favourably, how will the panel determine the outcome, similarly, if one member has concerns and others disagree how will this be ratified – will there be a vote? There is not sufficient information, at this stage, of the process for SDC to comment on specific sites in detail. However, as mentioned throughout this response, the Authority would support extraction on the most sustainable sites. The quantity of extraction should be sustainable; the Authority would not want vast swathes of scarred earth, but recognises the quality and desirability of its mineral resources. A balance is needed which should be brought about via a sequential test policy. The Authority does not support importing of waste on any 'new' sites, nor the intensification of importing waste. However, the continuation of existing businesses that are sustainable would be supported and would encourage new businesses to consider sustainable locations elsewhere. The processing and handling of indigenous waste is supported where it is most suitable to do so in the District, but the Authority will seek to export hazardous waste (raw or processed) to existing specialist facilities elsewhere.	Step 3 will score sites according to the scoring system set out in the methodology. The results of step 3 will then be passed on to the panel to consider other factors such as the possibility of mitigation. The findings of step 3 and 4 taken together will, as outlined in the methodology, 'form the basis for decisions to be taken on which sites to progress with and which to discard, subject to other considerations as set out in the limitations sectionDecisions on which sites to progress with would also need to be consistent with the preferred policy approach'. We will consult on the findings, including which sites will be progressed, at the preferred options stage.

Consultation Responses received as part of the Minerals and Waste Plan Consultation which specifically relate to the Site Identification and Assessment Methodology (Q189 of Minerals and Waste Joint Plan Consultation – Do you have any comments on the Minerals and Waste Joint

Plan Site Identification and Assessment Methodology?, Q.190 – Do you have any initial comments on the suitability of any of the sites or areas submitted so far?)

Respondent Reference	MWJP Consultation Comment Number/question number	Comment	SA Team Comments
SiteIDScope011 Ryedale District Council	<u>1212/Q.189</u>	Broadly support the SIAM. The SIAM should include consideration of potential effects and impacts on the archaeological heritage. It is Considered that the English Heritage Vale of Pickering Statement of Significance should be included in the list of documents to be considered for desk top study to identify constraints and opportunities as set out in Table 3 Page 11 of the SIAM document. Representatives from each of the District Councils should be part of the panel considering the sites.	We can confirm that the SIAM will include consideration of archaeological heritage. <u>The English Heritage Vale of</u> <u>Pickering Statement of Significance will</u> <u>be added to Table 3 and referred to</u> <u>where relevant.</u>
SiteIDScope012 North Stainley- with- Slenningford Parish Council	<u>282/Q.189</u>	There needs to be a focus on new areas of search to ensure that one area, such as near this parish, do not become over-burdened with mineral workings. There is a severe and permanent impact on the landscape when sites are restored using water.	Comment noted. The site assessment methodology will consider areas of search via an approach outlined on page 16 of the methodology.
SiteIDScope013 CPRE (Swaledale Branch)	<u>1358/Q.189</u>	Whilst the primary objective of CPRE is to protect Rural England it is understood that there is a need to extract some minerals, this must be done in the least destructive way. In the SIAM we broadly agree with the suggestions and could not find any specific detail to disagree with. The use of the expert panel is supported. Would welcome the opportunity to discuss the sites with you in more detail at the appropriate stage.	Comments noted.
SiteIDScope014 The Coal Authority	<u>889/Q.189</u>	The Coal Authority welcomes the inclusion of land instability as a constraint in Table 2. In relation to waste sites an additional criterion to consider mineral sterilisation should be included.	Minerals sterilisation is considered through policies in the plan. <u>However,</u> we agree that waste sites, for example could sterilise minerals. We will therefore add minerals resource areas to table 2.
SiteIDScope015 Kirkby Fleetham with Fencote Parish Council	<u>1428/Q.189</u>	Reasonable approach, but just because no proposals have been put forward for the development of mineral sites so far, does not mean that known potential locations should not be 'preserved' This is especially the case for aggregates, sand and clay.	This is a comment that is most relevant to the plan team and so will be passed on to that team to consider.

SiteIDScope016 English Heritage	<u>337/Q.190</u>	Many of the sites could impact on heritage assets. An assessment needs to be undertaken to evaluate the impact the potential sites could have on elements which contribute to the significance of assets before they are allocated. - Where relevant the sites should be assessed against the Managing Landscape Change study.	Comments noted. As identified in Table 3, where relevant, sites will be assessed against the Managing Landscape Change study. Step 3 will, through objective 10, assess the significance of impacts on heritage.
<u>SiteIDScope017</u> <u>CPRE</u> (Harrogate)	<u>1147/Q.190</u>	Support the need to identify mineral sites where waste development will be acceptable. Many of the submitted sites have waste treatment facilities included in their after use, but not many use waste in their restoration. Reed bed lakes are unsustainable land use. Would prefer to see sites being chosen where there is landfill capacity and available inert waste in close proximity. Sites should be on the lowest grade land to retain BMVL for agricultural use.	Comment noted.
SiteIDScope018 Yorkshire Wildlife Trust	<u>777/Q.190</u>	A spread sheet showing which sites are within 200 metres of Ancient Woodland, the Trust's Living Landscape and Local Wildlife Sites has been submitted. This work would be an excellent guide to what type of restoration would be appropriate for the sites which have been put forward.	<u>Thank you for providing this</u> information. This will be taken into consideration during the site assessment process.

Appendix 3: New National Planning Policy for Waste Locational Criteria

The new National Planning Policy for Waste suggests that Local Plans and planning applications should consider a range of locational criteria when testing the suitability of sites and areas. The table below sets out these locational criteria and shows (in the right hand column) how the Site Identification and Assessment Methodology has addressed these criteria and if any additional criteria need to be considered.

Locational Criteria in National Planning Policy	Is this covered in the Site Identification and Assessment Methodology?
 a. protection of water quality and resources and flood risk management Considerations will include the proximity of vulnerable surface and groundwater or aquifers. For landfill or land-raising, geological conditions and the behaviour of surface water and groundwater should be assessed both for the site under consideration and the surrounding area. The suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination, will also need particular care. 	Nitrate Vulnerable Zones and Groundwater Source Protection Zones are considered in related in relation to vulnerable surface and groundwater or aquifers. In addition, Catchment Abstraction Management Strategies are considered (all at Step 2). Environment Agency Flood Maps will help to show where river flooding could affect a site and lead to water quality issues. This is in addition to local Strategic Flood Risk Assessments which give a higher degree of detail and also consider groundwater flooding in relation to sites. However, it is recognised that strategic data is not a substitute for the detailed flood risk and hydrological data that would be needed to support planning applications.
<i>b. land instability</i> Locations, and/or the environs of locations, that are liable to be affected by land instability, will not normally be suitable for waste	Coal mining hazards and gypsum dissolution areas are considered where available (step 2). However, these could be more fully considered at Step 3, so <u>an additional question</u> <u>'Would land instability be likely to be an issue? Has been added</u>

management facilities.	to Site SA objective 5.
<i>c. landscape and visual impacts</i> Considerations will include (i) the potential for design-led solutions to produce acceptable development which respects landscape character; (ii) the need to protect landscapes or designated areas of national importance (National Parks, the Broads, Areas of Outstanding Natural Beauty and Heritage Coasts) (iii) localised height restrictions.	Design led solutions are not well considered by the Site SA framework. However, the assessment of sites will be limited in its potential to consider this as this is more applicable to the development management process. A broad question will however will be asked under objective 11: <u>'Are there any local factors that suggest a design led approach to mitigating landscape / townscape impacts might not be possible?'</u> This can help in the later consideration of potential mitigation. National Parks, AONBs and Heritage Coast are all considered in the evidence collected at Step 2 and the Site SA Framework. <u>Within York there is a localised height restriction that no building be higher than York Minster. 'Localised height restrictions' has been added to the information to be gathered at Step 2.</u>
<i>d. nature conservation</i> Considerations will include any adverse effect on a site of international importance for nature conservation (Special Protection Areas, Special Areas of Conservation and RAMSAR Sites), a site with a nationally recognised designation (Sites of Special Scientific Interest, National Nature Reserves), Nature Improvement Areas and ecological networks and protected species.	The Habitats Regulations Assessment of sites considers adverse effects on SPAs, SACs and Ramsar sites. SSSIs, NIAs, ecological networks and protected species are all considered at Steps 2 and 3 of the methodology.
e. conserving the historic environment	Designated and non-designated heritage assets are considered

Considerations will include the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting	in steps 2 and 3 of the methodology. The historic character and environment of the area is also considered through the evidence gathered at step 2 (e.g. Managing Landscape Change) and in a question to be asked of sites at step 3.
<i>f. traffic and access</i> Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads, the rail network and transport links to ports.	Transport data (rail / road / waterways) considered at Step 2 and via a series of questions at Step 3.
<i>g. air emissions, including dust</i> Considerations will include the proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles.	Both human and ecological receptors are considered for air pollution and dust at step 3 through the question 'Is the Site close to areas or populations that are sensitive to pollution or dust deposition?' The potential of equipment and vehicle management to control impacts will be considered in broad terms as mitigation is developed at step 4, though the detail of this can only be considered when planning applications are considered.
<i>h. odours</i> Considerations will include the proximity of sensitive receptors and the extent to which adverse odours can be controlled through the use of appropriate and well-maintained and managed equipment.	Odours are considered at step 3 under Site SA objective 4.
<i>i. vermin and birds</i> Considerations will include the proximity of sensitive receptors. Some waste management facilities, especially landfills which accept putrescible waste, can attract vermin and birds. The numbers, and movements of some species of birds, may be	Covered by the question, under Site SA objective 15, 'Would development of the Site be likely to increase the level of noise, vibration, vermin, litter or other amenity impact experienced by local communities?

influenced by the distribution of landfill sites. Where birds congregate in large numbers, they may be a major nuisance to people living nearby. They can also provide a hazard to aircraft at locations close to aerodromes or low flying areas. As part of the aerodrome safeguarding procedure (ODPM Circular 1/20035) local planning authorities are required to consult aerodrome operators on proposed developments likely to attract birds. Consultation arrangements apply within safeguarded areas (which should be shown on the policies map in the Local Plan).	
The primary aim is to guard against new or increased hazards caused by development. The most important types of development in this respect include facilities intended for the handling, compaction, treatment or disposal of household or commercial wastes.	
<i>j. noise, light and vibration</i> Considerations will include the proximity of sensitive receptors. The operation of large waste management facilities in particular can produce noise affecting both the inside and outside of buildings, including noise and vibration from goods vehicle traffic movements to and from a site. Intermittent and sustained operating noise may be a problem if not properly managed particularly if night-time working is involved. Potential light pollution aspects will also need to be considered.	Under SA objective 11 there is a question 'Is the Site likely to significantly increase visual intrusion (e.g. by being in a high or prominent location or by increasing light pollution)?' while receptors are considered at step 2, particularly through the consideration of sensitivities in Landscape Character Assessments. Noise and vibration are considered under Site SA objective 15.
<i>k. litter</i> Litter can be a concern at some waste management facilities.	Litter is considered under Site SA objective 15.
I. potential land use conflict	Site SA Objective 17 includes the question 'Would development

I likely proposed development in the visipity of the leastion under	of the Site be likely to prevent other allocated development from taking place?
witchility and the envioered wests monogram ant facility	Allocations in Local Plans are considered at Step 2.

Appendix 4: Sustainability Appraisal Criteria Identified in National Planning Guidance for Waste

Waste planning authorities are required to carry out a Sustainability Appraisal when preparing Local Plans. A list of non-exhaustive topics for SA, which is suggested by the National Planning Guidance for Waste², is presented below.

Table of possible Topics and Issues for the Appraisal Framework

Topic identified by DCLG	Issues identified by DCLG	Covered in Site Assessment Framework?	
Environmental	<u> </u>		
Sustainable use of resources	Level of materials recycling	Yes	
Climate Change		Yes CO2. Methane is not explicitly referred to in the Framework, though a sub objective refers to reducing emissions by moving waste up the waste hierarchy. This is considered to promote avoidance of landfill (a key source of CH4) though other key sources of methane may be acceptable. While at the site assessment level it will not be possible to consider the management processes that might be employed to, for example, reduce the methane from processes such as farm manure composting, the SA might be able to support co- location of facilities to utilise methane as an energy source. This is covered by the SA sub objective 'Could the site offer opportunities for renewable or low carbon energy production as part of its development for minerals or waste?'	

² As revised 16/10/2014

	Energy efficiency (consumption and generation)	Not relevant to the Sites Assessment work.
	Renewable energy generation	Yes
	Adaptation to climate change	Yes
Air Quality (including dust)	Emissions of pollutants (facilities and transport)	Yes
Noise and vibration	The impact of noise and vibration from waste related operations, including facilities and transport	Yes
Artificial Light	The impact of artificial light from waste related operations	Indirectly covered by reference to visual intrusion under the landscape objective (11). <u>However, to avoid</u> doubt the relevant sub objective will be changed to 'Is the Site likely to significantly increase visual intrusion (e.g. by being in a high or prominent location or by increasing light pollution)?'
Odour	The impact of odour from waste related operations	Yes (under the air quality objective (4))
Vermin	The impact of vermin from waste related operations	Indirectly covered by objective 15, but to avoid doubt the relevant sub objective will be changed to ' <u>Would</u> development of the Site be likely to increase the level of noise, vibration, vermin, litter or other amenity impact experienced by local communities?'
Water resources and Flood	Discharge of pollutants	Yes
Risk Management	Water consumption	Only partly covered. <u>Added a new sub objective to</u> more fully capture water consumption: ' <i>Will allocating</i> the site impact significantly on water availability?'
	Flood risk (including changes in risk due to climate change)	Yes
Sustainable resource use	Waste minimisation	Yes, this is indirectly covered by the sub objective 'Would the site be allocated for a purpose that is likely

		to facilitate the movement of waste up the waste hierarchy?'
	Moving up the waste hierarchy	Yes
	Minimising disposal	Yes – there is a sub-objective to 'facilitate the recycling or re-use of minerals or waste?'
	Extent to which planning authority manages	No. A new sub objective has been added; 'Would the
	its own waste arisings	Site contribute to the Joint Plan Authorities' ability to manage their own waste arisings?
Land and soil	Land contamination	Yes
	Land take	Yes
	Use of previously developed land	Yes
	Impact on Green Infrastructure	Considered across several objectives (e.g. biodiversity (objective 1) and recreation, leisure and learning (objective 14), though not explicitly referred to as GI. GI is also considered in our baseline. We feel that as a whole the Framework is sufficient to recognise the multifunctional nature of GI.
	Use of soils, impact on soil quality (including positive)	Yes
Landscape	Impact on landscapes (urban, rural, urban fringe) and nationally protected landscapes	Yes
	Impact on Green Belt (e.g. maintain extent, openness)	Yes
Biodiversity	Conservation of biodiversity	Yes
Historic environment	Protection of built heritage	Yes
	Protection of archaeological heritage	Yes
Social		
Quality of surroundings	Impact on recreational and open spaces	Yes
	Improving the quality of where people live	Yes
Transport	Kilometres travelled by waste	Yes

	Congestion	Yes
	Impact on local infrastructure	Yes
	Reducing reliance on the car	Yes
Health	Impact on human health	Yes
Access to services	Good and equitable access to services	Partly, e.g. objective 15 refers to issues of severance in communities. However, to strengthen / clarify equitable access to services <u>the relevant sustainability</u> <u>question has been amended to: 'Would the Site or</u> <u>traffic levels associated with it be likely to cause any</u> <u>issues of severance to be experienced in communities</u> <u>or impair access to community facilities in any way?</u>
	Improved access for those most in need	Yes – under objective 17 a sub objective refers to increasing public access to waste management.
Public involvement	Opportunities for participation	Yes - sub objective to objective 17 refers to supporting community led waste management schemes.
	Opportunities for education and awareness raising	Yes, under objective 14 opportunities for learning are referred to in the sub objectives/
Economic	· · · ·	
Sustainable economic growth	Costs of waste management	No. To address this, <u>a new sub objective to objective</u> 12 has been added ' <i>would the costs of minerals or</i> <i>waste management be reduced through allocating the</i> <u>Site?</u> '
	Economic benefits of waste minimisation and resource efficiency/reuse	Yes covered by several sub objectives under the banner of the headline objective 'achieve sustainable economic growth and create and support jobs'.
	Inward investment	Yes, covered by several sub-objectives including 'would allocating the site be likely to enable new business opportunities to emerge or help support existing businesses?'
Employment	Number of jobs created	Yes

Contact us

Minerals and Waste Joint Plan, Planning Services, North Yorkshire County Council, County Hall, Northallerton, North Yorkshire, DL7 8AH

Tel: 01609 536493 Email: mwsustainability@northyorks.gov.uk