

Submission to MWJP EIP from Ryedale Liberals

Response to Draft Matters, Issues and Questions (MIQs) questions 1-3, 11, 18.

Matter 1. Minerals.

Overview.

1. Does the MWJP identify all the main challenges to providing minerals sustainably in the Plan area, and are these challenges properly reflected in the vision and objectives and incorporated in policy?

1.1 See Ryedale Liberals Appendix 1. Your Ref 3846/0967/4.001/LC.U.DTC

1.2 In sustainability terms it is essential to know the location of any mineral within the plan area. With reference to hydrocarbons, this is unknown and therefore it is impossible to measure in sustainability terms.

2. How does the MWJP seek to achieve the efficient use of minerals resources?

2.1 See Q1 in relation to efficient use of hydrocarbons. It doesn't. The location and volumes of hydrocarbons is unknown within the plan area and therefore it is impossible to achieve an efficient use of these resources. Response to Ref 3846/0967/4.001/LC.U.DTC does not even refer to the efficient use of minerals. It may well be of interest, but is not relevant to this point.

3. Bearing in mind that minerals can only be worked where they are found, does the MWJP seek to achieve the most appropriate spatial strategy for minerals development? How is this reflected in the Plan?

3.1 For all rocks, minerals etc this is what it appears to do. For hydrocarbons, it doesn't even attempt to do this. i.e. there is no spatial strategy for hydrocarbon development. There is no decision on what is the most appropriate area.

Minerals allocations in general

11. In general how does the Plan seek to ensure that any significant constraints/adverse impacts of development of these allocations are overcome/mitigated to an acceptable level?

4.1 Although there are no allocations in relation to hydrocarbons, even if there were, the plan may not adequately protect against potential impacts.

Concreting sand and gravel

18. Should reference be made to a "mid-term review" or should there be a commitment to carry out a review within 5 years from adoption? (PPG ID: 12-008-20140306). The Town and Country Planning (Local Planning)(England)(Amendment) Regulations 2017, regulation 4 "Review of local development documents" states that reviews of local plans must be completed every five years, starting with the date of adoption of the local plan. This regulation is due to come into force on 6 April 2018.

5.1 Does this question relate to concreting sand and gravel only? There appears to be no similar question in relation to hydrocarbons, which would appear to be a far more important area to review and amend regularly in view of its recent addition to the draft plan.

5.2 With reference to hydrocarbons it is essential that a review of the plan takes place nearer to two years than five. In the case of an unexpected outcome, the hydrocarbon section may need to be reviewed at any time.