

Joint Minerals Local Plan Revised Preferred Approach Consultation Feedback

Respondent	Response type	Summary of comments	Response and changes to the Joint Minerals Local Plan
Organisations			
Coal Authority	Support	Support policies EM1, 2, 3, 4 and 5 and DM3.	N/A
Crown Estate	Omission	Support subject to factual corrections relating to marine aggregate statistics (para 4.87, 4.88, 4.89)	Amended text included alongside more up to date information where available.
Doncaster Metropolitan Borough Council	Omission	Amend para 68, Thorne Colliery no longer in production.	Amended as suggested
Environment Agency	Omission	Include reference to EAs groundwater protection approach.	This has been included within site briefs for relevant allocations.
		Hydrogeological risk assessment requirement at pre-planning stage for any proposed mineral exploration. General protection to the water environment should be provided for within certain policies.	This has been included within site briefs for relevant allocations and policies.
		Wishes to see reference to the different vulnerability classifications of minerals sites Emphasis on sequential approach to development and flood risk within minerals sites needed.	This has been included within site briefs for relevant allocations.
		Wording to ensure proposals do not cause any adverse impacts to the water environment.	Wording included within site briefs.
		SA does not adequately address potential impacts on the water environment	The SA has been amended.
		Various minor additions and amendments to individual site development briefs.	Complete
		Amend Policy EM2, EM3, EM4 and EM7 from 'private water supplies' to 'potable water supplies' to cover both public and private safe drinking water supplies. Make reference to protection of general water environment also.	Amendments included
		Paragraph 4.12 – insert reference to PPG water compatibility/vulnerability classification tables.	Amended as suggested

		Reference to functional floodplain where relevant.	Reference included in site briefs for relevant sites.
		Queries what data has been used for site selection in the Plan.	This is set out in the Site Selection Background Paper.
		Greater reference to climate change, emergency planning needed.	It is not clear from the response how these would be factored into the plan in the way envisaged.

ERYC Sustainable Development	Omission	Amend para 6.66 to mention Shoreline Management Plan.	Amended as suggested
		Amend RAMSAR to Ramsar (not an acronym).	Amended throughout document
		Suggested amends to para 7.9 re Habitat Regulation Assessment (HRA).	Amended as suggested
		Policy DM7 A – amend to say significantly. Refusal of permission on these grounds would need to be based on a significant rather than insignificant imp-act.	Comments noted. Policy DM7 has been deleted following adoption of both the East Riding and Hull Local Plans. Biodiversity Policies within these plans provide sufficient protection to protected species.
		SG11 – 2 overlapping candidate Local Wildlife Sites (LWS) now merged, amend text as suggested.	Amended as suggested
		SG12 – suggested amends, Little Kelk Farm designated LWS and Barf Hill Wood a candidate LWS within the AOS.	Amended as suggested
	Objection	References to biodiversity need to reflect current government policy: <ul style="list-style-type: none"> • Suggested amends to para 7.18. • Amend 7.27 biodiversity targets to biodiversity priorities. • Policy DM3 delete references to biodiversity targets. 	Amendments made and some no longer relevant as reference is now made to biodiversity policies elsewhere in the development plan.
		Policy DM6 B – HRA not required for geological sites, delete reference to geological sites.	Comments noted. Policy DM6 has been deleted following adoption of both the East Riding and Hull Local Plans. Biodiversity Policies within these plans provide sufficient protection from mineral development.
		CR4 – delete reference to Humberhead Levels, factually incorrect.	Comments noted. Allocation CR4 has now been deleted from the plan so this change is no longer relevant.

		CR7/8 - The comment on Little Wold Plantation in CR7 needs to be cut and pasted into the biodiversity section of CR8. Also add reference to the LWS being a Woodland Trust nature reserve.	Allocation CR8 Swinescaif, South Cave has now been removed from the Plan, so the change is no longer relevant. Reference to Little Wold Plantation has been removed from the site brief for Allocation CR7, Greenwick.
	Support	Policy EM7 Part iii. Important that developers recognise coastal erosion risks when locating their infrastructure	Support noted
		Support references to planning applications being subject to all other relevant Development Plan policies and material considerations.	Support noted
ERYC Transport Policy (Mark Jessop)	Support	Concern over potential for increased traffic. Supports policies DM1, DM5 and DM11 if robustly applied. Policy DM11 could include reference to independent monitoring of traffic management plans.	Noted. Reference to monitoring included in supporting text.
Fenstone	Support	Support for policy AGG4, para 5.27 and safeguarding of industrial chalk deposits	Noted.
	Omission	NAMI – include preference for extensions rather than new quarries	There is already an inherent preference for supporting expansions to existing sites through the requirement for an existing or proposed processing plant to be located in the immediate locality. Extensions to existing sites has been covered under a new policy AGG5, which doesn't include a needs test.
		AGG3 – more clarity required regarding crushed rock output figures used	This is set out within a revised Local Aggregates Assessment and Aggregates Apportionment Background Paper.
Friends of the Earth	Objection	Object to Policies EM1-6 as they are incompatible with Section 19 of Planning and Compulsory Purchase Act 2004. Suggest amendments to consider the assessment of climate change impacts and change terminology to	Proposed amendments to Policies EM1-EM6 could not be made as National Planning Policy requires plans to be 'positively prepared' to support development that

		<p>'consider' rather than 'support' energy mineral development subject to a number of criteria. Criteria in Silica Sand Policy NAM3 supporting proposals in close proximity to Highways England's network is a concern.</p>	<p>accords with planning policy without delay.</p> <p>Policy NAM3 has been amended to remove criteria relating to Highways England's network.</p>
Highways England	Omission	<p>Generally supportive of the Plan. Want further information on impact SG15, SG16, SG11, SG12, CR4 and CR8 will have on the Strategic Road Network.</p>	<p>Agreed amendments to the development briefs for relevant sites following meeting 11.01.17, to mention requirement for an operational traffic management plan.</p>
Historic England	Objection	<p>Several comments regarding Policy EC6 in the East Riding Local Plan</p> <p>Recommended that heritage quarries are safeguarded with a 250 metre buffer surrounding each one.</p>	<p>This Policy has not been re-presented for consultation so no amendments can be made.</p> <p>The quarries are safeguarded and guidance is provided in the East Riding Local Plan Strategy Document as to what distance away from a quarry the safeguarding policy should apply.</p>
		<p>Recommend deletion of SG8 AOS south of the A166 at Garton on the Wolds due to potential impacts on the historic environment (several barrows).</p>	<p>This allocation has been deleted from the Plan</p>
		<p>For sites (SG9 Brigham, CR4 North Cave Castle Farm and CR7 Greenwick AOS) Historic England require assessment of the impact minerals development might have upon historic assets and conservation areas nearby.</p> <p>Mitigation measures may be needed based upon the assessment. If mitigation is not possible then the allocations may need to be deleted, unless there are clear public benefits that outweigh the harm.</p>	<p>Site visits undertaken with ERYC officers, Historic England and Humber Archaeology. Each site assessed appropriately and amendments to site briefs agreed to ensure the protection of historic assets. Allocation CR4 has been deleted from the Plan.</p>
		<p>Amend Proposal Map to show the location of quarries identified in para 2.56</p>	<p>These are shown on the Policies Map</p>

		Amendments to Para 7.6 and Policy DM3 and para 7.35.	Amended as have been made or section of plan has been deleted .
		Amendment to the vision to facilitate to supply of local building stone. Insert a Policy relating to building stone.	Amendments to the vision and policy has been inserted accordingly.
		Amend site briefs SG3, SG7, SG15, SG16 and SG11.	Amended as suggested. Allocation SG3 has been removed from the plan (but retained as part of the SG11 Area of Search allocation).
	Support	<p>Historic England support:</p> <ul style="list-style-type: none"> • paras 2.6, 2.55, 2.56, • the Vision, • Joint Plan Objective 1 and 2, • Policies NAM2, NAM3, EM1 Criterion v, EM2, EM3, EM4, EM5, EM6 Criterion A.iv and D.iii, DM1, DM6, DM8, and • Site SG12. 	Comments noted
Hughes Craven Ltd	Omission	<p>Policy AGG1:</p> <ul style="list-style-type: none"> • Criterion A should clarify the land bank will be based on latest LAA figures to avoid confusion. • Criterion C part i and iii conflict each other if an application to increase a depleted land bank is brought forward - suggested rewording. • Criterion D approach to aggregate extraction outside of allocated sites is too restrictive and doesn't allow for exceptional circumstances – suggested deletion/rewording. 	Reference to annual monitoring is included in the supporting text to policy AGG1. Clarity on what 'significantly increasing' stands for in the supporting text. Criterion D has been removed.
		Policy AGG3 Crierion A, C and D - suggested amendments/deletion (exactly as above for AGG1).	Reference to annual monitoring is included in the supporting text to policy AGG3. Clarity on what 'significantly increasing' stands for in the supporting text. Criterion D has been removed.
		Policy DM5 Criterion B – requirement of report too onerous/detailed. Minor rewording of Policy suggested.	Reference to a report has been removed from the policy.

		Policy DMI I Criterion A i and A iv achieve similar aims and should be combined.	Policy DMI has been deleted from the Plan, mainly on account of duplication with policies elsewhere in the development plan as a whole.
Hull Friends of the Earth	Omission	Fracking – suggest inclusion of precautionary policies.	The issues covered in within the suggested policies are largely covered within Policy EM6 of the Plan.
MJCA on behalf of Humberside Aggregates	Support	Inclusion of sites SG15 and SG16 at North Cave as Preferred Sand and Gravel extraction sites	Noted
	Omission/Objection	Policies AGG1, AGG3 suggested removal of Part D to the Policies.	Amended as suggested
		Suggested inclusion of land east of Crosslands Lane (near SG15 Brook Farm) as a Preferred Area.	This site has not been included in the Plan due to potential impacts upon nearby residential properties and sufficient resources being available to meet needs over the plan period identified within other allocations.
		Requested that site CR4- Land north east of North Cave, north of Castle Farm' be included as a Preferred Area for crushed rock extraction.	This site has been removed from the Plan altogether now as a result of Breedon buying out Humberside Aggregates. Breedon are not intending to exploit the limestone resource in this location.
Humber Archaeology Partnership	Support	DM policies provide adequate protection for archaeological remains.	Noted
Imerys	Objection	Strongly object to NAM1 regarding the need to maintain processing plant for extending industrial chalk operations. Chalk may need to be processed remotely.	Criteria has been relaxed to include consideration of proposed processing plants and well as existing, and the proposed extraction of chalk would need to serve works in the local are rather than immediate locality.
Messrs. W Clifford	Omission	Area of Search SG12 Gransmoor Lane and Lissett is far	SG12 has been reduced in line with current

Watts		too extensive and should be reduced.	and past mineral operator activity as well as future interest.
		Area of Search SG9 Brigham should be widened.	This area of search has been expanded and its status changed to a preferred area.
Mineral Products Association	Support	Policies, AGG2, AGG3, AGG4, AGG5, AGG6, AGG7, AGG8, AGG9, NAM3, DM2. DM3, DM4, DM5, DM6, DM7, DM8, DM9, and DM10.	Noted
	Objection	Deletion of policy SDI and EC6– duplication of Strategy Document policies unnecessary.	Noted. <ul style="list-style-type: none"> • Policy SDI has been deleted and text referring to the NPPF Presumption in favour of sustainable development retained.. • Policy EC6 is presented for information only- not for consultation.
		Objection to the removal of glaciolacustrine deposits from mineral safeguarding areas.	Noted. Glaciolacustrine deposits have been safeguarded once again in recognition of the local importance of the resource.
		Policy AGG1, part C. object to inclusion of needs test in policy prior to allowing unallocated proposals to take place.	Policy has been amended to apply only to extraction from new quarry sites. Extensions to existing sites has been covered under a new policy AGG5, which doesn't include a needs test. Reference to the landbank is needed to ensure completely new operations are not permitted where these are not needed to meet supply requirements. This ensures minerals development takes place in a planned manor in line with allocations in the plan. As part of the plan-making process new or existing operators were given the opportunity to put forward completely new quarry sites for allocation. Few were forthcoming and those that have haven been

			considered in the Site Assessment Background Paper accompanying this plan.
		Policy AGG1, suggested deletion of Part D of the Policy as this removes flexibility and stifles competition amongst operators by preventing proposals over a certain size threshold from coming forward away from allocated sites.	Part D is deleted as there were certain instances where large scale proposals may be needed that are in line with Policy AGG1 Part C. For example a borrow pit for a large construction project.
		DMI suggested rewording.	Policy has been deleted due to repetition with other parts of the JMLP and the Development Plan as a whole.
	Omission	Policy AGG1: Inadequate LAA forecasting of future demand for aggregates (need to factor in market upturn, local plan growth and likely requirements from neighbouring areas).	An analysis of a range of factors that contribute to aggregate demand has been presented in a revised Aggregates Apportionment Background Paper supporting the plan. The aggregate supply requirement for the plan has been adjusted according to the paper's findings.
		A new policy is required for mineral infrastructure safeguarding to bring the plan into alignment with national policy.	A new Policy AGG10 has been included to address this.
		Various amendments suggested to Policy DM11 to clarify the policy.	Alternative amendments have been made to make the policy clearer. Now Policy DM5.
MJCA on behalf of W Clifford Watts	Support	Policy AGG2, inclusion of sites SG8, SG9, and SG12. Inclusion of a number of operational sites in Appendix A.	Noted
	Objection/omission	AGG1 part D contradicts part C - part D should be revised.	Part D has been deleted.
		AGG3 part D contradicts part C - part D should be revised.	Part D has been deleted.
Natural England	Objection/omission	Amend Mineral Safeguarding Areas to remove designated sites for nature conservation interest.	There is no presumption in favour of minerals development within safeguarding areas and it would be contrary to Good Practice on safeguarding referred to in National Planning Practice Guidance.

		Support Policy DM3, suggested amends to criterion C iv to include the enhancement of landscape character and setting with regards to designated and locally valued landscapes in themselves, not just in relation to heritage assets.	Policy has been amended.
		Include clearer statement that takes into account the wider value of soil resources and range of vital functions.	The general issues raised are covered by the plan and amendments.
		Policy DM4 include reference to necessity for high standard restoration and aftercare of best and most versatile agricultural land. Take account of wider value of soil resources.	The general issues raised are covered by the plan and amendments.
		Policy DM6 criterion B, remove reference to development within Natura 2000 sites, such rare cases should be assessed against Habitat Regulations. Amend to read “no adverse effects on the integrity”.	Comments noted. Policy DM6 has been deleted following adoption of both the East Riding and Hull Local Plans. Biodiversity Policies within these plans provide sufficient protection from mineral development.

		<p>Further assessment and investigation required on allocations; SG3 Routh PA, SG15 Brook Farm PA, SG16 The Outgang PA, SG8 Garton AOS, SG9 Brigham AOS, SG12 Grassmoor and Lissett AOS, CR4 North Cave AOS, Castle Farm AOS, CR7 Greenwick AOS, CR8 Swinescaif AOS.</p> <p>Concerns over potential detrimental effect on; hydrology and wetland plant species of Leven Canal SSSI (SG3, SG11), Humber Estuary SPA and Ramsar birds (SG15, CR4, CR8), hydrology of River Hull Headwaters SSSI (SG8, SG9, SG12), Hornsea Mere SPA (SG11), Drewton Lane Pits SSSI and Hotham Meadows SSSI hydrology and its effect on amphibians and neutral grassland (CR4), Millington Wood and Pastures SSSI, Bishop Wilson Deep Dale, Thixen Dale and Long Dale SSSI and Horse Dale and Holm Dale SSSI hydrology (CR7).</p>	<p>Further assessment and investigation completed resulting in a Natural Environment Background Paper supporting the Plan. Sites SG3, CR4, and CR8 have been deleted from the plan.</p>
		<p>Include specific requirement in CR7 site brief for mitigation to avoid encroachment, dust or water pollution on Millington Wood and Pastures SSSI.</p>	<p>Amended as suggested</p>
		<p>Amend CR8 site brief to include great crested newt surveys and necessary mitigation measures, and include a requirement to avoid and mitigate any visual and amenity impacts on the adjacent Yorkshire Wolds Way National Trail.</p>	<p>Site CR8 has been deleted from the Plan.</p>
		<p>Advise the 2015 HRA report is updated with the progress of the Plan.</p>	<p>Noted</p>
		<p>Advise that the SA is kept up to date with the plan and the Habitats Regulations Assessment.</p>	<p>Noted</p>
North Yorkshire County	Support	Support for proposed Mineral Safeguarding Areas,	Noted

Council		including retention of glaciolacustrine sand and gravel deposits. Policies EM1, EM2, EM3, EM4, EM5, EM6, and EM7, Map showing onshore license blocks.	
	Support with suggestions.	Policies AGG1 and AGG3 are supported but could part D be unnecessarily restrictive.	Part D has been deleted.
Omya UK Ltd	Omission	Suggested amendments to policy AGG9 to safeguard Melton Bottom sidings. Wishes to see policy test based on maintaining compatibility of the sidings with general freight use rather than purely minerals transport.	Such amendments would be incompatible with National Planning Policy which requires existing and potential rail facilities for transporting minerals safeguarded as such.
Pegasus	Omission	Policy EM6 – suggested amends to support shale gas extraction in line with para 144 of NPPF.	Some amendments made.
Zetland Group on behalf of Rathlin Energy	Omission	Suggested amendments to paragraphs: 6.22 – make provision for appraisal and production phases alongside exploration. 6.23 – use consistent terminology, omit ‘sunk’ and insert ‘drilled’. 6.24 – define ‘development of resources’ 6.25 – include reference to permitted development rights for seismic surveys. 6.26 – amend expected timescales for mineral operations (from experience). 6.28 – additional text re. exploratory boreholes and the use of existing infrastructure to minimise environmental impact. 6.32 – Oil and gas development is not permanent but long term. Amend text as suggested. 6.35 – not always able to locate exploration boreholes in least environmentally sensitive area, balance between geological data and environmental location. 6.36 – include reference to appraisal boreholes. Policy EM3 part ii – impacts can be minimised but there may be some temporary disturbance. Omit ‘do not cause’ and insert ‘minimise’. Policy EM4 – location of pipelines is not linked to	Amendments have been made to the Plan to accommodate the substantive points made.

		subsurface geology, amend appropriately. Omit 'do not cause' and insert 'minimise'. Flaring not referenced in policies EM2 and EM3, consistency required throughout policies.	
Ryedale District Council	Omission	Check distance of nearest Ryedale silica sand quarry to boundary of East Riding. Include long distance footpaths in policy DM5.	Acknowledged. Policy refers to public rights of way.
Yarrows		Land south east of Leven by-pass (proportion of SG11) should be retained as a Preferred Area as known resources exist there.	This site has been allocated as a Preferred Area for Sand and Gravel Extraction in the Plan.
Zetland	Omission	Various minor amendments relating to the oil and gas background text and policies. Show up to date oil and license blocks.	Some amendments made and up to date license blocks shown on a map.
Town and Parish Councils/Community Groups			
<ul style="list-style-type: none"> • Burton Agnes Parish Council • Frack Free Bridlington • Frack Free East Yorkshire • Kilham Parish council • Middleton on the Wolds Parish Council 	Objection/omission	<p>Fracking – suggested policy amendments against hydraulic fracturing. Require further clarification.</p> <p>The plan's approach is incompatible with legal requirements relating to Climate Change.</p> <p>Plan needs to clarify that it is unknown whether the Plan area's geology is suitable for fracking.</p> <p>Concern over whether pollution controls will work effectively.</p> <p>The Plan should be in line with the Full East Riding of Yorkshire Council motion of 22/6/16, which takes a precautionary approach to Fracking proposals.</p> <p>A full and thorough review on the impact on the Councils obligations under the Localism Act (2011) and</p>	<p>The Joint Minerals Local Plan can only include consideration of planning concerns. This means focusing on whether a development itself is an acceptable use of the land, and the impacts of those uses, rather than any control processes,</p> <p>The specific legal duty in relation to climate change for Local Plans is in Section 19(1A) of the Planning and Compulsory Purchase Act 2004. This requires inclusion in Local Plans of "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change". The overall Development Plan for both Hull City and East Riding areas meets this duty, when read as a whole. This</p>

		<p>the Infrastructure Act (2015) should be undertaken as this influences the adoption of the JMLP.</p> <p>The Plan has not considered coal gasification.</p> <p>Specifically policy criteria needed to prohibit the re-injection of waste (or 'produced') fluid from unconventional hydrocarbon operations back under the ground.</p> <p>Plan should presume that fossil fuel development would not be supported unless more stringent criteria are met.</p> <p>Who judges whether impacts from fossil fuel developments would be unacceptable?</p> <p>Cumulative impacts of several fossil fuel developments need to be considered if approved.</p> <p>Should not assume that pollution control regimes will work effectively.</p> <p>Various other clarifications and minor amendments to supporting text.</p>	<p>includes considerations of Policies within the Hull and East Riding Local Plans, as well as the Joint Minerals Local Plan.</p> <p>National planning guidance is clear that planning authorities should assume that non-planning regulatory regimes will operate effectively.</p> <p>The Environment Agency Permitting regime ensures that any shale gas operations are conducted in a way that protects people and the environment. This covers; protecting water resources, appropriate treatment and disposal of mining waste produced during the borehole drilling and hydraulic fracturing process, suitable treatment and management of any naturally occurring radioactive materials (NORM), and disposal of waste gases through flaring.</p> <p>The Oil and Gas Authority has responsibility for assessing risk of and monitoring seismic activity, as well as granting consent to flaring or venting</p> <p>The Health and Safety Executive (HSE) inspects the well design, its construction and upkeep to ensure that measures are in place to manage risks effectively throughout its life cycle.</p> <p>The Plan is in line with the East Riding motion as Policy EM6 lists a number of tests that Fracking proposals would need to satisfy before being approved, focussing on pollution</p>
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			<p>of the water environment issues.</p> <p>The UK Government has announced it is not supportive of Coal Gasification techniques being used to create gas.</p> <p>A policy criteria already exists that requires that arrangements can be made for the management or disposal of any returned water from Fracking developments.</p> <p>Criteria added to Policy EM6 (Extraction of Shale Gas) to avoid unacceptable adverse impacts as a result of vibration and induced seismicity.</p>
Bridlington Town Council	Omission	Fracking will impact on the visibility of the area. Take into account the road haulage. No mention of fracking in the introduction.	Noted. Policies in the Plan and East Riding Local Plan seek to avoid unacceptable impacts.
Leven Parish Council	Objection	SG3 Preferred Area – access to be taken from A1035 and not Carr Lane, Leven.	Allocation SG3 has now been deleted from the plan, although it is still part of the wider SG11 Area of Search Allocation and access details have been included within the site brief for this accordingly.
	Support	SG3 reinstatement of land for nature conservation.	Nature conservation uses are specified as part of the potential mix of restoration uses for Area of Search SG11.
Rowley Parish Council	Omission	Include volume of scheduled extraction for each named site to prevent sites expanding to meet Plan's criteria.	This is already established in the planning permissions for the sites. If further expansion of the sites is needed, planning permission would need to be sought with associated impacts assessed and mitigation provided to lessen impacts accordingly.
Walkington Parish	Omission	Para 7.16 add "traffic routing".	Amended

Council		Policy DMI I developers should carry a responsibility for highway works. Para 7.50/51 should be applied rigorously.	Noted
Individuals			
<ul style="list-style-type: none"> • Alison Tindale, • Brian and Glenys Sanders, • Christina Sharaz, • J A Shields, • Louise Castro, • Malcolm Hara, • Mavourneen Burrows, • David Burrows, • Michael Brookes, • Mike Moss, • Alan Crofts, • Andrew Boothfroyd, • Anne J Brookes, • Clive Hinchliffe, • Ian and Sue Jolliffe, • Lynne Garland-Collins • Michael Farman, • Nam Prakash Kaur, • Neil Cooper, • Neil Parker, • Pamela Crofts, • Patricia Rennison • Paul Tranmer, • Sally and Chris Brealey, • William and Margaret Coultard, • Pat Smith, • Jane Humphry 	Objection/omission	<p>Widespread concern about the potential harm of hydraulic fracturing (fracking) on the health of East Riding residents and the natural environment. Resident objected to both conventional and unconventional fossil fuel extraction in the East Riding and suggested amends to the policy and supporting text. Reoccurring themes are highlighted below:</p> <ul style="list-style-type: none"> - Use of fossil fuels will exacerbate climate change. Council has a duty to consider climate change, see NPPF para 94 “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change*, taking full account of flood risk, coastal change and water supply and demand considerations.” (*footnote – in line with the objectives and provisions of the Climate Change Act 2008) - Potential pollution of ground water sources (drinking water), including noise, dust, odour and emissions pollution having a detrimental effect on human health and the environment. - Potential trigger for seismic activity - Suggested use of precautionary approach - “When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the precautionary principle must be open, informed and democratic and must 	<p>The Joint Minerals Local Plan can only include consideration of planning concerns. This means focusing on whether a development itself is an acceptable use of the land, and the impacts of those uses, rather than any control processes,</p> <p>The only specific legal duty in relation to climate change for Local Plans is in Section 19(1A) of the Planning and Compulsory Purchase Act 2004. This requires inclusion in Local Plans of “policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”. The overall Development Plan for both Hull City and East Riding areas meets this duty, when read as a whole. This includes considerations of Policies within the Hull and East Riding Local Plans, as well as the Joint Minerals Local Plan.</p> <p>National planning guidance is clear that planning authorities should assume that non-planning regulatory regimes will operate effectively.</p> <p>The Environment Agency Permitting regime ensures that any shale gas operations are conducted in a way that protects people and the environment. This covers; protecting</p>

		<p>include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action.”</p> <p>(http://sehn.org/precautionary-principle/)</p> <ul style="list-style-type: none"> - JMLP is contradictory – states that climate change is a ‘key consideration’ of the JMLP however the extraction of shale gas (fossil fuel) is supported. Potential impact is understated and minimised. - Negative effect of minerals development on the view and setting of the picturesque East Riding and Yorkshire Wolds. - Requirement to restore exhausted minerals sites. - Need to consider cumulative impacts from potentially hundreds of well sites should fracking reach production stage. - More explanation as to what certain terms mean in the document such as ‘acceptable adverse impacts’ or ‘mitigating unacceptable adverse impacts’ - No mention of Underground Coal Gasification when there has been operator interest in this in the past. 	<p>water resources, appropriate treatment and disposal of mining waste produced during the borehole drilling and hydraulic fracturing process, suitable treatment and management of any naturally occurring radioactive materials (NORM), and disposal of waste gases through flaring.</p> <p>The Oil and Gas Authority has responsibility for assessing risk of and monitoring seismic activity, as well as granting consent to flaring or venting</p> <p>The Health and Safety Executive (HSE) inspects the well design, its construction and upkeep to ensure that measures are in place to manage risks effectively throughout its life cycle.</p> <p>The Plan is in line with the East Riding motion as Policy EM6 lists a number of tests that Fracking proposals would need to satisfy before being approved, focussing on pollution of the water environment issues.</p> <p>The UK Government has announced it is not supportive of Coal Gasification techniques being used to create gas.</p> <p>A policy criteria already exists that requires that arrangements can be made for the management or disposal of any returned water from Fracking developments.</p> <p>Criteria added to Policy EM6 (Extraction of Shale Gas) to avoid unacceptable adverse</p>
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			<p>impacts as a result of vibration and induced seismicity. There is already a criteria relating to the water environment in the Policy.</p> <p>Further supporting text has been provided in the plan to explain certain terms used within policies and how the policies are to be applied.</p> <p>The Department for Business, Energy and Industrial Strategy said the government was “minded to not support” underground coal gasification in the UK. This is partly due to carbon emissions being comparatively high to other forms of fossil fuels</p>
No Comment			
<p>Cottingham Parish Council National Grid North Lincolnshire Council York Consortium Drainage Boards (Foss IDB and Beverley and North Holderness IDB)</p>			