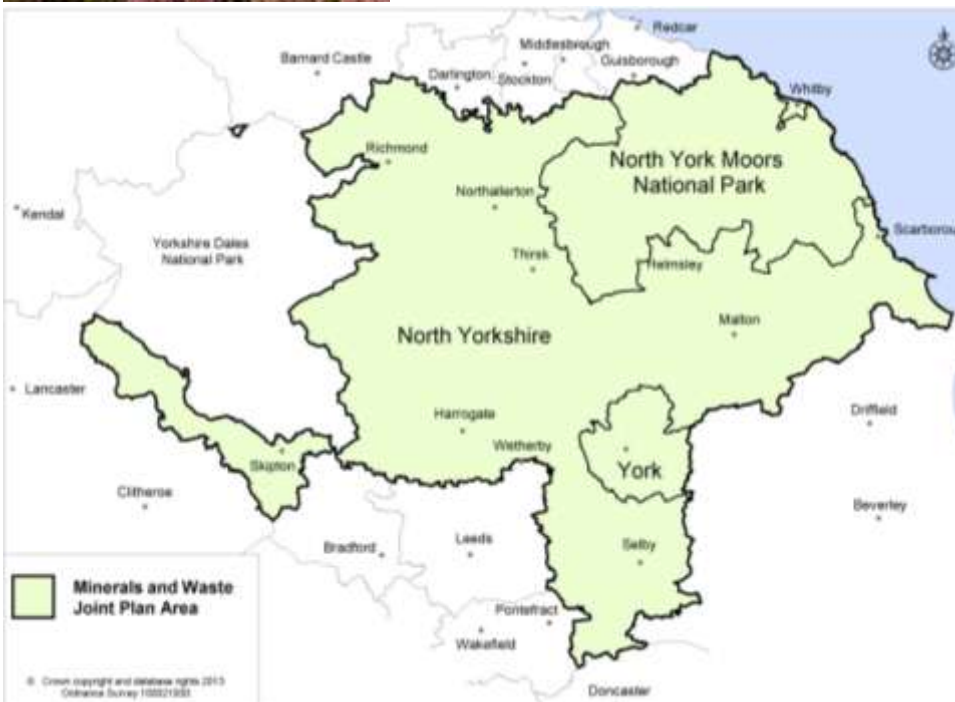


Minerals and Waste Joint Plan

Consultation Outcomes Report

For Consultations on the Joint Minerals and Waste Sustainability Appraisal and on the Site Identification and Assessment Methodology – Undertaken Summer 2013

February 2014



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1 Introduction

North Yorkshire County Council, the City of York Council and the North York Moors National Park Authority have agreed to work together to prepare a Minerals and Waste Joint Plan (the 'Joint Plan'), which will cover the period up to 2030. The Joint Plan will contain the spatial framework for future minerals and waste development across the three authorities and present land use policies and allocations for future minerals and waste development.

The main role for the Joint Minerals and Waste Plan will be to deal with key questions such as:

- what sort of minerals and waste related development is likely to be required over the period up to 2030;
- where should minerals and waste related development take place;
- when is minerals and waste development likely to be needed, and;
- how should it be carried out?

The Joint Plan will be prepared under the provisions of the Town and Country Planning (Local Planning) Regulations 2012¹. These Regulations set out the procedures for producing Local Plans, which include a requirement to undertake Sustainability Appraisal (SA).

The preparation of the Sustainability Appraisal must also be in accordance with the requirements of European Directive 2001/42/EC (known as the Strategic Environment Assessment, or SEA Directive). The SA methodology proposed in the SA Scoping Report will, in accordance with Government guidance², meet the requirements of SA and SEA through one appraisal.

2 Consultation Process

From 17th May, to 28th June, 2013, the Joint Plan authorities consulted on a number of documents to inform the preparation of the Joint Minerals and Waste Plan. This consultation was carried out in accordance with Regulation 18 of the Town and County Planning (Local Planning) (England) Regulations (2012) and included a Minerals and Waste Joint Plan First Consultation leaflet (setting out the intention of the authorities to produce a Joint Plan) and the Joint Minerals and Waste Plan Sustainability Appraisal Scoping Report (which included three volumes: a main report, the baseline information and an appendices volume). Two comments forms were also provided for consultees to respond to: the first related to issues which should be addressed by the Joint Plan (which included one question on the approach to the sustainability appraisal and another question asking for additional comments), and the second sought responses on the Sustainability Appraisal Scoping Report (nine SA-specific questions and one 'other comments' question were asked as part of this questionnaire). The documents were issued for consultation for six weeks.

This Report aims to document the comments received on the Scoping Report, setting out the nature of the responses received and how those responses will be used to inform future stages of the Sustainability Appraisal of the Minerals and Waste Joint Plan.

In total, 297 representations were received from 46 interested parties in relation to the Sustainability Appraisal Scoping Report. The three statutory consultees (Natural England, English Heritage and the Environment Agency) are included in the total number of responses from organisations. Table 1, below,

¹ These Regulations build upon the broader system for producing plans set out in the 2004 Planning and Compulsory Purchase Act. For instance, the arrangements for Development Plan Documents are amended and those DPDs are renamed as Local Plans.

² Department for Communities and Local Government, 2012. National Planning Policy Framework. DCLG, London [URL: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf].

shows the number of responses received in relation to each question on the SA comments form and more detailed information on responses to each consultation question and general comments are set out in Section 3, Tables 2 to 11, together with a response from the Joint Plan authorities in relation to how these have been addressed. In addition, 43 respondents made comments on the Joint Plan comments form (which included a question on the Sustainability Appraisal) and these are detailed in Tables 12 and 13 and additional comments made regarding the Sustainability Appraisal are detailed in Table 14.

Table 1: Summary of the number of responses to each question within the Sustainability Appraisal Scoping Report

Question		No. of Responses
1	Do you agree with the general approach we are taking towards sustainability appraisal?	30
2	Do you think the supporting assessments being carried out are sufficient for this sustainability appraisal?	22
3	Do you agree with our review of plans, policies, programmes, strategies and initiatives (PPPSIs)? Are there any PPPSIs that we have not considered?	9
4	Do you agree with the key messages from the PPPSI review?	11
5	Do you think that we have gathered baseline information appropriate to the Plan Area?	11
6	Have we identified appropriate sustainability issues? Are there any other sustainability topics or issues we should consider?	10
7	Do you agree with the sustainability objectives and sub-objectives? Can you think of any further objectives, sub-objectives or indicators that we should add to the SA framework?	9
8	Is there anything else that we should consider when we assess options and consider alternatives in the Minerals and Waste Joint Plan?	9
9	Is the approach we are taking to the consideration of alternative options appropriate?	7
10	Do you have any other comments on the Scoping Report?	17

Two consultation events were held as part of the consultation on the SA Scoping Report. These comprised of workshops involving a number of technical stakeholders who had the opportunity to comment on the SA objectives and Site Assessment Identification and Assessment Methodology in a workshop format. The workshop outcomes are described further in section 4 of this report.

There are also a number of appendices to this report:

- Appendix 1 lists consultation responses in full;
- Appendix 2 and Appendix 3 describe the findings of the consultation workshops held
- Appendix 4 summarises the findings of a separate consultation on the Site Identification and Assessment Methodology

3 Joint Minerals and Waste Plan Sustainability Appraisal Scoping Report Consultation Outcomes

This section describes the comments received in relation to the Scoping Report. The tables in the following section include a summary of the responses received (by question) and a brief explanation of how these have been addressed in finalising the Scoping Report. A full outline of consultation responses is included in Appendix 1.

3.1 Responses to the Sustainability Appraisal Questionnaire

Table 2 - Question 1: Do you agree with the general approach we are taking towards sustainability appraisal?

Response/General Comments Summary	No. of Representations	SA Team Response
Economic considerations should be considered more explicitly (with some references to Allerton Waste Recovery Park).	4	Publically funded development costs are considered outside of the SA and planning processes. AWRP has already been awarded planning permission. Most minerals and waste developments are privately financed.
Forecasting of future need should be carried out.	3	Forecasts are being carried out as part of the production of the Plan and are contained in the evidence base at www.northyorks.gov.uk/mwevidence .
Flexibility in terms of future changing need should be an integral part of the Plan.	2	This issue will be addressed within the Plan, which will need to include an element of flexibility.
The appraisal should seek enhancement of the environment in addition to seeking sustainability.	2	This may be carried out through restoration plans and is assessed across a number of SA objectives.
Supports the approach.	2	Comments noted.
You are pre-empting choices for future generations.		The Sustainability Framework builds upon the Brundtland definition of sustainable development and sustainability issues derived from a wide range of plans and baseline data. The SA aims to meet present generation's needs without constraining the ability of future generations to enjoy a similar or improved quality of life.
Supported the approach provided that the appraisal is based on current data and information and not historic commitments (e.g. Allerton Waste Recovery Park).	1	Comments noted. Although a limited amount of information has been taken from previous sustainability appraisal work, the assessment work that will carried out will be an entirely new and original exercise, undertaken against a new set of SA objectives, informed by a new baseline for a new plan area. There is no obligation to repeat any historical assessment findings. The plan cannot reassess AWRP as this already has planning permission.
Transparency should be an integral part of the appraisal and it should be indicated why a certain alternative has been chosen.	1	The SA will give a clear indication of the relative merits of different options as they pertain to sustainability.
The way in which the conclusions of the appraisal will be submitted to public consultation is not set out.	1	There will be three more rounds of consultation during appraisal of the Plan. These will be at the Issues and Options,

		Preferred Options and Publication stages of the Plan preparation, and the SA conclusions will be reported at each of these stages.
Sufficient time for the sustainability appraisal has not been allowed.	1	The statutory time for consultation is five weeks, although six weeks were allowed for this consultation.
The approach is exhaustive and could be more direct, instead of the catch-all approach used.	1	We have considered a wide range of topics in line with SEA Directive requirements and the need to consider social and economic topics to fulfil SA requirements. However, where a topic is not relevant to the particular part of the Plan being assessed this will simply be noted and not considered further.
The approach should use the correct tools to quantify the values of the county's assets.	1	We have used nationally available indicators where possible and also data relating to the Plan Area from the relevant authorities in order to measure the impact on these assets.
The definition of sustainability within the Plan must be more clearly considered.	1	We have used the Brundtland definition as the basis for the SA, and also built upon this with the Government's Principles set out in the UK Sustainable Development Strategy.
Doesn't support the general approach as previous consultation comments have not been taken into account.	1	The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in this Consultation Outcomes document at section 5. The SA builds upon recommendations made in previous SA related consultations.
The full Brundtland definition of sustainability should be used.	1	This is used in section 3.1 of the scoping report.

Table 3 - Question 2: Do you think the supporting assessments being carried out are sufficient for this sustainability appraisal?

Response/General Comments Summary	No. of Representations	SA Team Response
There are missing data for forecasting of waste and waste treatment methods.	8	Forecasts are being carried out as part of the plan production. The SA will be required to include predictions of the likely evolution of environmental, social and economic assets with and without policies in the plan. Waste technical papers and Topic Papers contain information on waste treatment methods, and are available as part of the Plan evidence base at www.northyorks.gov.uk/mwevidence .
Specific technical information on environmental conditions (such as air pollution in the Vale of York) across	2	Meteorological conditions and effects on air pollution in the Vale of York have not been discussed in the sustainability appraisal.

certain parts of the plan area has not been included.		However, Air Quality Management Areas are listed in the Baseline document and an indicator on the number of AQMAs is included in the SA Framework alongside the SA sub objective 'Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users'. Reference to local climatic conditions has been added to the air quality section of the baseline.
The condition of heather moorland and its decline should be more clearly stressed/discussed.	2	Comments noted. SSSI condition is assessed within the baseline information.
With regard to mitigation measures, there should be support for publically accessible recreation and attractions, not to private landowners.	1	Comments noted. Specific measures for mitigation will be considered in the Sustainability Report, however it is felt that the sub objectives to SA objective 10 'to improve access to, and enjoyment of, the historic environment where appropriate' should allow for consideration of any need to avoid or mitigate for any potential conflicts with public access.
The sites and areas assessment methodology has not been drafted.	1	Targeted consultation on this was carried out in summer 2013 and it is available for public consultation as part of the Issues and Options consultation.
Missing analyses of future potential political trends.	1	The Defra 2011 waste policy review is included, in addition to the NPPF and PPS10 which contain government policies on waste management. In the revised scope general analysis of predicted future trends has been added to the baseline volume.
Supporting assessments are sufficient.	1	Comments noted, thank you.
There is missing information on the regional context of North Yorkshire and its neighbours.	1	For the maintenance of brevity the SA scope focussed on the plan area, while the wider evidence base to the Plan considers interactions with elsewhere, particularly in the context of minerals and waste. The evidence base for the plan can be found at: www.northyorks.gov.uk/mwevidence . The review of other plans and programmes contained in the Scoping Report includes regional plans which ensure that the objectives of these have been considered in establishing the SA objectives.

Table 4 - Question 3: Do you agree with our review of plans, policies, programmes and initiatives (PPPSIs)? Are there any PPPSIs that we have not considered?

Response/General Comments Summary	No. of Representations	SA Team Response
There is too much information.	2	The Strategic Environmental Assessment Directive and Government guidance on Sustainability Appraisal requires that all relevant plans, policies, programmes and initiatives at an international, European, national, regional and local scale that are relevant to the plan should be included. For a plan which is outlining minerals and waste development the list is comprehensive due to the many environmental, economic and social issues that this kind of development can influence. However, the key messages from all of the PPPSIs considered are distilled down into a relatively short list within the main scoping report document.
Broadly agree.	2	Comments noted, thank you.
Habitats Regulations Assessment/Appropriate Assessment that has been carried out to support development plans should be included.	1	HRA will be carried out on the Joint Plan. AA will be carried out if needed.
The EU Habitats Directive and the Birds Directive have not been included in addition to the England Biodiversity Strategy.	1	The Habitats Directive and Birds Directive are included within the PPPSIs and in the baseline report. The England Biodiversity Strategy is referred to by its name 'Biodiversity 2020'.
The review of PPPSIs and the analysis is unclear.	1	The assessment must address a wide range of social, economic and environmental topics including those issues defined by the SEA Directive. While this leads to a lengthy list of PPPSIs it should be noted that only relevant objectives of this policy context are drawn out in the analysis.

Table 5 - Question 4: Do you agree with the key messages from the PPPSI review?

Response/General Comments Summary	No. of Representations	SA Team Response
The NPPF states that Local Plans should be developed with other authorities.	2	The district councils are not the minerals and waste planning authorities, although proposals are discussed with these councils. In addition, relevant local authority plans are included. Discussions and consultations are taking place with adjoining, and more distant where relevant, minerals and waste planning authorities.
Broadly agree.	2	Comments noted, thank you.
Economic viability is not included.	1	Comments noted. The key messages are

		based on evidence gathered from all relevant PPSIs, including a number of economic PPSIs.
Yes.	1	Comments noted, thank you.
Full public participation is a key issue.	1	There are more opportunities for the public and stakeholders to be consulted as the Plan progresses. All views will be considered alongside Government policy.
Broadly agree, although some messages relating to protecting and enhancing biodiversity have not been included.	1	Comments noted. These will be included in the finalised Scoping Report. In the PPSI review the Lawton Report is not specifically mentioned as this is taken forward as policy in Biodiversity 2020.
The review is not holistic or strategic.	1	Many PPSI have targets, therefore we have taken all targets into account and synthesised their requirements in the key messages review. This in turn has informed the development of holistic and strategic SA objectives.

Table 6 - Question 5: Do you think that we have gathered baseline information appropriate to the Plan Area?

Response/General Comments Summary	No. of Representations	SA Team Response
There are no forecasts for future trends.	4	While we have considered trends, we feel that we have not done this consistently or clearly. We have addressed this by presenting 'predicted future trends' in the baseline volume of the SA Scoping Report.
There is a lot of information and it is hard to know which bits are relevant.	3	Comments noted. A non-technical summary was provided as part of the Sustainability Appraisal Scoping Report.
There are no specific climate data for local areas.	1	Air quality, in addition to health, is included within the SA objectives. Reference to local climatic conditions has been added to the air quality section of the baseline.
Several areas of the baseline data and information need to be updates (for example, the National Character Areas).	1	Comments noted, these will be updated when available.
Landscape-scale conservation initiatives are missing from the baseline.	1	Comments noted. Nature Improvement Areas will be added to the baseline.

Table 7 - Question 6: Have we identified appropriate sustainability issues? Are there any other sustainability topics or issues we should consider?

Response/General Comments Summary	No. of Representations	SA Team Response
Flexibility in terms of future changing need should be an integral part of the	2	There will be an element of flexibility built into the plan.

Plan.		
The end products of waste treatment should be considered.	1	Decisions on process options/waste treatment, etc. will be made by the Joint Plan team (rather than suggested by the Sustainability Appraisal). However, the SA will evaluate the predicted effects of any proposed option in relation to this.
The full Brundtland definition of sustainability should be used.	1	This is used and referred to in section 3.1 of the scoping report.
There is no identification of the interaction between minerals and waste policy.	1	This work will be carried out as part of preparation of the Plan. However, it is recognised that greater links between minerals and waste could be made in objective 9 by including a sub objective 'Recognise and promote the value of waste streams as alternatives to primary mineral extraction'.
The issues are appropriate.	1	Comments noted, thank you.
The data need to be synthesised into a coherent spatial and temporal model.	1	It is not for the SA to propose a spatial and temporal model at this stage. Rather it is the plan itself which will decide upon the 'how and where'. The SA will critique and challenge the approach, and may propose alternative spatial/temporal approaches.

Table 8 - Question 7: Do you agree with the sustainability objectives and sub-objectives? Can you think of any further indicators we should add to the SA framework?

Response/General Comments Summary	No. of Representations	SA Team Response
There are too many, and many of them are conflicting.	2	The intention of the Scoping Report (which formed this consultation) is to outline all the key sustainability issues relevant to the Joint Plan. The objectives list key outcomes which we should be aiming to achieve as part of the Joint Plan. The next stages of the Sustainability Appraisal will take into account alternative options for minerals and waste development and the extent to which each objective may, or may not be achieved under alternatives, or options. Inevitably, trade-offs will need to be made between objectives.
Yes, agree with the objectives and sub-objectives.	1	Comments noted, thank you.
Protection and enhancement of natural environments should be applied beyond just conservation sites.	1	This is taken into account under sustainability objective number 1.
Broadly agree, although objective 10 needs a further sub-objective that protects locally/sub-regionally significant	1	Comments noted. A sub-objective has been added to Objective 10 stating 'Protect and enhance important non-designated heritage

non-designated assets. In addition, objective 12 should recognise the relationship of minerals and waste operations with surrounding economic uses.		assets' In addition we agree that surrounding economic uses need to be recognised in objective 12 and this is covered by the sub-objective 'Support existing businesses and the local economy outside of the minerals and waste sectors'.
Especially support the objectives, sub-objectives and indicators relating to biodiversity, habitat connectivity and creation of priority habitat. There should also be a sub-objective to promote the delivery of a net-gain in biodiversity.	1	Comments noted. These will be included in the finalised Scoping Report.
There are too many. In addition, there is no national, or regional justification of the need for minerals and waste provision.	1	The SA objectives taken as a whole consider the sustainability of approaches taken by the plan makers as presented, and the SA has the capacity to develop and then assess alternative approaches that may show alternative ways of provision that may be more (or less) sustainable. The evidence base for the plan focusses more on minerals and waste and the needs and requirements for future developments and can be viewed at www.northyorks.gov.uk/mwevidence .

Table 9 - Question 8: Is there anything else we should consider when we assess options in the Minerals and Waste Joint Plan?

Response/General Comments Summary	No. of Representations	SA Team Response
The previous consultation has been ignored.	3	Input from earlier consultations carried out as part of the separate Minerals and Waste Core Strategies have been taken into account in developing the Issues and Options document. Responses to previous SA consultations have been used as the starting point for the SA Scoping Report and are further discussed section 5 of the Consultation Outcomes Report.
District and adjoining authorities should be represented.	3	District and adjoining authorities have been and will continue to be consulted on the SA.
Local focus and knowledge is missing.	1	Minerals and waste development is a strategic issue and therefore needs to be planned at a wider than local scale. However, local knowledge will be taken account of in the SA of proposed sites and areas of search.
Table 61 shows that protection and enhancement of biodiversity and enhancement of habitat connectivity will have a major positive benefit, however, it will only be successful if long-term	1	Comments noted. It should be noted that the table includes only an illustrative example, not an actual assessment. The effect on biodiversity due to the amount of site restoration carried out will be monitored as

management is carried out, therefore securing long-term management of newly created habitat is vital.		the Plan is implemented.
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Table 10 - Question 9: Is the approach we are taking to the consideration of alternative options appropriate?

Response/General Comments Summary	No. of Representations	SA Team Response
We cannot understand/it isn't clear how this is being carried out.	2	Section 7.1 outlines how alternatives will be considered, and this is presented in more detail in the Sustainability Appraisal Update Report published as part of the Issues and Options consultation.
There isn't much information on the options appraisal provided and Allerton Waste Recovery Park is not included.	1	Options will be appraised at the issues and options stage. Allerton Park cannot be considered as it already has planning permission.
The method is too simplistic.	1	The scoring system used in the SA follows best practice. However, scoring will be fully explained and supported by evidence and professional judgement.
The options that are ruled out should be included and detail should be provided about why these have been ruled out.	1	This will be included in the SA as part of the preferred options stage.
The approach is appropriate.	1	Comments noted, thank you.

Table 11 - Question 10: Do you have any other comments on the scoping report?

Response/General Comments Summary	No. of Representations	SA Team Response
There hasn't been enough time to analyse the information.	2	The statutory time for consultation is five weeks, although six weeks were allowed for this consultation.
There is no flexibility built into the assessment.	2	The plan will contain an element of flexibility.
There is too much information for members of the public to provide a view on the report.	1	Comment noted. A Non-Technical Summary was also provided. A longer Non-Technical Summary will be provided with the Sustainability Report.
There is no commitment to pause the planning permission given to Allerton Waste Recovery Park.	1	Allerton Park has already been given planning permission and cannot be reassessed as part of this process. Other waste infrastructure that is needed for the plan area will be considered as part of the SA.
We are in agreement with the aims of the document, but a balanced assessment of affordability and environmental costs should be made.	1	Objective 12 will provide balance to other objectives to ensure that addressing other objectives does not unnecessarily jeopardise sustainable economic growth.

Forecasting of future waste volumes has not been carried out.	1	Forecasts are being carried out as part of the plan and additional evidence is available in Topic Papers which can be viewed at www.northyorks.gov.uk/mwevidence .
The previous consultation exercise has been ignored and the responses to this consulted pre-empted by awarding planning permission to Allerton Waste Recovery Park.	1	The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in this Consultation Outcomes document. As the Plan Area changed with the inclusion of CYC and NYMNP, the consultation exercise had to be carried out again to meet statutory requirements.
You need to clarify that it is the Mineral Planning Authorities and not the Local Planning Authorities as detailed in the baseline report.	1	Comments noted. Amendments have been made.
There is too much information that does not matter to the development of the Plan.	1	Relevant evidence for minerals and waste development, which will inform the policies, is set out within the evidence base for the plan which can be viewed at www.northyorks.gov.uk/mwevidence . The data for the Sustainability Appraisal outlines the current environmental, social and economic conditions across the Plan area, and future monitoring will detect any deterioration or improvement.

3.2 Other Consultation Responses

Tables 12-14: Summary of types of responses to questions 4 and 5 of the Joint Minerals and Waste Plan Regulation 18 questionnaire. Table 15 details all other responses that were made to the consultation.

Table 12 – Responses to the Joint Minerals and Waste Plan comments form: Do you have any comments on the proposed approach to Sustainability Appraisal as set out in the summary leaflet and the scoping report?

Response/General Comments Summary	No. of Representations	SA Team Response
Waste incineration is not sustainable/objection to Allerton Waste Recovery Park.	18	<p>The sustainability of site allocations will be assessed against 17 SA objectives to give a rounded view of the sustainability of different options for waste management.</p> <p>Allerton Park has already been granted planning permission and will therefore not be considered as part of the Joint Minerals and Waste Plan.</p>

The Waste Hierarchy should be considered/waste should be minimised.	13	The waste hierarchy is taken into account within objective 9.
Development management issues highlighted (such as site screening/landscaping, restoration plans, etc.).	8	Development management issue – this has been passed over to the plan team.
There is too much information and the documents are too long/excessive.	3	Comments noted. A non-technical summary was provided as part of this Sustainability Appraisal.
Transport (lorries) should be routed away from settlements.	2	A site assessment methodology to appraise the siting of minerals and waste development is being developed to consider such issues. The scoping report also includes an objective for sustainable transport and an objective for the reduction of the causes of climate change.
The Water Framework Directive should be taken into account.	2	Minerals and waste policies will be assessed on their effect on surface and groundwater, as set out in the SA framework.
The environmental sensitivity of Source Protection Zones and the public water supply is a concern.	2	The location of sites within areas of particular environmental sensitivity will be taken account of within the site assessment methodology.
The Plan will need to be flexible.	2	The Plan will contain an element of flexibility.
The approach is sound.	1	Comments noted.
Local considerations must be made.	1	The SA will be informed by published literature and professional judgement. In addition, the site assessment methodology that is currently being developed will take account of local circumstances and will feed into the wider sustainability appraisal.
Support for the enhancement or maintenance of water quality and improvement of water use efficiency objective.	1	Comments noted.
The appraisal should identify local provision of material.	1	All sites, options and policies within the Joint Plan will be assessed against all sustainability objectives outlined within the scoping report. Local provision is supported by the SA objectives.
Low carbon public transport would be valuable in a predominantly rural county.	1	The SA framework supports low carbon public transport, but this can be addressed in more detail in local transport plans.
The Yorkshire Water 'Water Resource Plan' would be a suitable addition to the PPPSIs.	1	Comment noted. The Plan is included in the PPPSI.
Objective 2 (Prevent unsustainable levels of ground and surface water abstraction) is invalid as the Environment Agency regulate this issue.	1	The SA recognises that some issues are dealt with by the environmental permitting regime. However, it will be important not to produce a spatial plan which cumulatively leads to unsustainable use of water.
Support of objective 6 (Maximise the	1	Comments noted.

generation and use of renewable energy in appropriate locations).		
Support of sub-objective 'recover residual resources'.	1	Comments noted.
Suggest that a sub-objective relating to the promotion of sustainable drainage is included.	1	Promotion of SUDS for future development is included in objective 16.
Emphasis should be placed on re-using, reducing and recycling waste, in addition to local composting.	1	We recognise the need to move up the waste hierarchy, which is included in objective 9.
Sustainability Appraisal should take a balanced approach.	1	A balance between social, environmental and economic aspects of alternatives will be made.
Natural England's opinion should be sought on any proposed site from the outset to avoid sites with high environmental value being included in the Joint Plan.	1	Agreed and comments noted.
The Sustainability Appraisal should consider costs in addition to minimising waste produced.	1	Where developments are publically funded, costs are considered alongside the SA in addition to consultation outcomes. Most minerals and waste developments are privately financed.
Sustainable development should meet human needs and preserve the environment.	1	Comments noted. This is reflected within the SA objectives.
The production of hazardous waste should be taken into account.	1	This will be taken into account under sustainability objectives numbers 4 &15.
The Sustainability Appraisal should assess effects on the environment.	1	The sustainability objectives take all relevant environmental effects into account.
Some minerals are clearly running out. We should be looking for alternatives which are less damaging to the climate, the environment, and to human and animal life.	1	Sustainability objective number 8 covers this issue.
Supports the sub-objectives	1	Comments noted.
Objection to fracking within the County.	1	The sustainability objectives are designed to assess the effects of all types of minerals and waste development. All assessment will be evidence based, drawing on published studies and professional judgement.
The Plan should aim to enhance the environment.	1	This is covered by a number of SA objectives.
Public engagement should be a priority of the Council.	1	There will be a number of opportunities for the public to comment throughout production of the Plan.
The Plan should make contributions to all objectives as well as conservation and renewable energy.	1	These issues are covered under the sub-objectives.
More attention should be given to the recycling of plastics.	1	This is considered as part of sustainability objective 9 which supports the management

		of waste further up the waste hierarchy, and objective 17 which supports 'community led waste management schemes'.
Carbon costs of waste transport should be considered.	1	Carbon emissions are taken into account under sustainability objective number 6.
SA objectives: Number 2 - add in word 'supply' to read 'Enhance or maintain water quality and supply...'; Number 3 - add in word 'impact' to read 'Reduce transport impact and reduce...'; Number 5 - add in word 'environmental' to read 'Use soil and land efficiently and safeguard or enhance environmental quality'; Number 6 - add in 'low carbon economy' to read 'Reduce the causes of climate change and move to a low carbon economy'.	1	It is felt that the additional wording to objective 5 is not necessary as other objectives seek to safeguard environmental quality. Similarly, a low carbon economy is supported by objective 12. Objective 2 has been amended to include reference to supply - 'Enhance or maintain water quality and supply and improve efficiency of water use'. An additional sub objective 'protect groundwater source protection zones' has also been added. Objective 3 - impact is covered under objective 15.
The economic, social and environmental priorities should be set out after consultation.	1	Comments noted. There will be three further rounds of consultation on the plan (Issues and Options, Preferred Options and Publication) and a Sustainability Report will be produced at each stage.
Welcome the approach to evaluating the robustness of the SA objectives.	1	Comments noted. The compatibility matrix will be reviewed as part of the finalised scoping report.
More detail should be added to the objective that seeks to use soil and land efficiently to ensure high standards of reclamation and appropriate afteruse.	1	The Plan will set out policies relating to reclamation and restoration of sites. The sub-objectives are sufficient to assess whether restoration policies will contribute to the SA objective. Restoration itself isn't a sustainability objective - though the existing sub objective 'promote good land management practices on restored land' should encompass the points made.
Habitats Regulations Assessment should be carried out in order to inform the Sustainability Appraisal.	1	Agree. Work has recently commenced on the Habitats Regulations Assessment for the Joint Plan.
A BAP habitat opportunities report produced in 2009 by the Yorkshire Wildlife Trust should be included.	1	Comments noted. Habitat opportunity maps were considered in the Regional Spatial Strategy. However, the relevant part of the RSS has been revoked.
We are satisfied with the approach to the Strategic Flood Risk Assessment.	1	Comments noted.
The Humber River Basin Management Plan should be specifically referred to.	1	Comments noted. The Humber River Basin management Plan is referred to within the PPPSIs.
We welcome objective 7 on enhancing biodiversity.	1	Comments noted.
General: Sustainability Appraisal Scoping - Appendix 1 – suggested amendments: 3. Reduce transport miles and associated emissions from transport	1	The sub objectives already include 'Encourage proximity between minerals and waste sites and markets / sources'. However, it is accepted that it may be

and encourage the use of sustainable modes of transportation. Add as sub objective: encourage beneficial use of waste near to site of production or treatment. Reason: excessive transport costs can make reuse/recovery of waste uneconomic.		unclear as to what the scope of this sub objective is. Therefore, an explanatory footnote will be added to clarify the sub objective, and in particular the beneficial uses to which both traditional and non-traditional end products of waste processing can be put when users exist nearby.
Objective 4 - Protect and improve air quality. Add as sub objective: consider potential for odour effects on existing communities. Reason: Unpleasant odours from waste facilities are one of the most common causes for public complaint, and have a detrimental effect on amenity.	1	The existing sub objective 'to minimise dust and odour' would cover the point made. However, it does not identify specific receptors to odour, which may result in variance in significance. Reword the sub objective to 'to minimise dust and odour, particularly where communities or other receptor may be affected'.
Objective 5 - Use soil and land efficiently and safeguard or enhance their quality. Add as sub objective: Ensure when biodegradable waste is spread to land it has a beneficial effect. Reason: Spreading inappropriate wastes to land can cause damage to soil and water.	1	This is too detailed an action to be included as a sub-objective and for assessing policies of the Joint Minerals and Waste Plan and is covered more broadly by 'promote good land management practices on restored land'
Objective 8 - Minimise the use of resources and encourage their re-use and safeguarding. Add as sub objective: Encourage sustainable construction techniques so as to reduce resource use in all building. Because: These principles can be applied to all construction.	1	Agree. The sub objective will be added as 'Encourage the utilisation of sustainable construction techniques'.
Objective 9 - Minimise waste generation and prioritise management of waste as high up the waste hierarchy as practicable. Add as sub objective: Ensure all infrastructure is designed and built so as to maximise opportunities for segregation and collection of recyclables, e.g. Adequate space for bin storage, home composting etc. Because: Ease of collection makes recycling more cost effective.	1	This suggestion is a policy rather than a sustainability objective or sub-objective.
We welcome the inclusion of objective 12 on achieving sustainable economic growth.	1	Comments noted.
15. Protect and improve the wellbeing, health and safety of local communities. Suggestions: Could this be widened to include all potential detrimental impacts on amenity and wellbeing. There is no specific mention of the potential for odour which we have found to be an important factor in whether a waste facility is acceptable to its near	1	Odour is already mentioned under SA objective 4 - however we accept that it can have impacts on quality of life, so we will include odour as an example of a nuisance impact in the first sub objective, i.e.: "To minimise the impact of nuisances associated with minerals and waste development, such as noise pollution, odour and severance'.

neighbours.		
We welcome the approach taken to underpinning the Plan with sustainable development principles.	1	Comments noted.
The Sustainability Appraisal does not include the nature and need for sub-regional and national waste processing.	1	Comments noted/agree in part. Further consideration of the sustainability of waste processing at a sub regional / regional level should also be considered during the assessment where relevant to options / policies..
Economic viability should be considered in the sites and areas assessment methodology.	1	Comments noted. The site assessment methodology will include assessment of the viability of sites with the aim of aiding the allocation of only viable sites.
Economic viability is not considered.	1	This isn't relevant to the appraisal as most development will be commercially financed.
Previous comments on the Waste Core Strategy consultation have been ignored.	1	Responses to previous consultations carried out by NYCC on the Core Strategies have been considered in drawing up the Issues and Options document. The SA scoping report as presented has been informed by the sustainability appraisal work that has preceded it in all three partner planning authorities. While it is hoped that the core elements of those SA documents are retained (and appendix IV shows the headline SA objectives arrived at through consultation in previous consultation rounds which were reviewed ahead of this work), inevitably a changed plan scope and geographical area will lead to adjustments in the approach taken to this new sustainability appraisal.
Broad support of the SA objectives, although more rigour should be applied to reducing greenhouse gases.	1	Comments noted. This is taken into account under sustainability objective 6.
A sub-objective should be added to assess how both the minerals and waste frameworks contribute to resource efficiency improvements and the circular economy.	1	This is considered to be particularly detailed for the nature of the Plan, but the sub-objectives under Objective 12 and Objective 9 would cumulatively address this.
Options for job creation via Community Interest Companies and charities should be considered.		Agree. CICs and charities can play an important role in waste management and are already supported by the sub objective to 17 'to support community led waste management schemes'.
Objective 5 on soil quality should encompass improving the water and carbon retention of soils (to prevent flooding and sequester carbon to prevent CO2 reaching the atmosphere) and reducing topsoil lost to wind and	1	This is too detailed an objective to be specified within the SA. It should be noted that the sub objective 'conserve and enhance soil resources and quality' would cover this in a broader sense.

water erosion by ensuring particles are heavier so less easy to blow away.		
Waste should be dealt with close to the producers of that waste so that they can see the results of waste production.	1	For this issue, the Proximity Principle in PPS10 is used, along with consultations carried out as part of the Plan and the accompanying SA.
Impact on landscape character should be taken into account.	1	Landscape Character Assessment will inform the site assessment methodology.. 'Reading the Past in Today's Landscape: North Yorkshire, York and Lower Tees Valley Historic Landscape Characterisation (HLC)' will be added to the PPPs
Care must be taken to acknowledge that mineral development can only take place in areas where the mineral quality and resource are of sufficient scale to merit development. For new workings a resource of over 1.5 million tonnes is generally required to justify the capital costs of the planning process and site development costs.	1	Comments noted.
Greenhouse gas emissions should be stressed as a key element to consider.	1	Sustainability objective 6 takes this into account.
Supports the objectives.	1	Comments noted.
We should aim for a zero-carbon footprint.	1	Sustainability objective 6 takes this into account.
There is a need to ensure that the Plan does not contravene the SA.	1	The SA will inform the final Plan.
The SA should take into account the impact on rural industries.	1	A rural proofing exercise was undertaken in the Scoping Report.
Issues of significant air pollution exist in Knaresborough.	1	Comments noted. AQMAs are recorded in the baseline volume of the scoping report.
Is the objective that seeks to encourage sustainable transport valid in terms of minerals and waste planning?	1	Comments noted. The transport impacts of waste can be significant and are thus considered in the assessment.
Support the objectives, yet several conflict with each other.	1	Uncertainty between competing objectives and their compatibility is shown in the scoping report.

Table 13 – Responses to the Joint Minerals and Waste Plan comments form: Do you have any other comments?

Response/General Comments Summary	No. of Representations	SA Team Response
Objection to Allerton Waste Recovery Park development.	5	Allerton Park has already been given planning permission and will not be assessed in this SA.
Needless expansion is detrimental to the landscape and environment.	2	Comments noted.

Restoration of the landscape should be a priority.	2	Development management issue – this has been passed to the planning team.
The site specific details required to assess sites will be too difficult to assess in some cases.	1	Sites put forward will provide this information.
There needs to be an element of flexibility integrated into the Plan.	1	The plan will need to be flexible - this has been passed to the plan team.
Quarry sites submitting plans to extend must only be able to do so if they have exhausted the mineral deposits.	1	A certain level of mineral reserves will need to be maintained.
Objection to fracking in North Yorkshire due to the economic impact on visitor attractions.	1	Sustainability objective 12 covers economic issues. Any fracking options / policies would be considered by this and the wider SA Framework.

Table 14 – All other comments on the Sustainability Appraisal Scoping Report.

Response/General Comments Summary	No. of Representations	SA Team Response
The Minerals and Waste Plan team should take a strategic view of all Minerals and Waste projects across the area covered by this plan and facilitate collaborative working between the two streams i.e. minerals and waste.	2	This is an issue for the Plan team and so this comment will be passed to them.
The Humber River Basin Management Plan should be taken into account.	2	The Humber River Basin Management Plan is explicitly referred to in the review of PPPSI.
Development management issue regarding restoration processes highlighted.	1	These are detailed development management considerations that can only be considered by the Plan and not the SA. These comments will be passed over to the Plan team.
Selection of sites should be carried out with full public involvement.	1	The public will be consulted on at all stages of the Sustainability Appraisal process. Consultations will also take place on the Site Assessment Methodology and findings.
Re-use of products, especially mining by-products is of utmost importance.	1	The SA objective 8 should include a sub objective that recognises the value of secondary mineral resources – i.e. 'promote the use of secondary and recycled minerals resources where they can play a role in reducing the need for primary minerals extraction'. This is also an issue for the Plan team and so this comment will be passed to them.
The Minerals and Waste Plan team should take a strategic view of all Minerals and Waste projects across the area covered by this plan and facilitate collaborative working between the two	1	This is an issue for the Plan team and so this comment will be passed to them.

streams i.e. minerals and waste.		
Can the Minerals and Waste Plan team influence schemes put forward by private companies where they are not in the interest of local communities?	1	This is an issue for the Plan team and so this comment will be passed to them.
The Minerals and Waste Plan team should take a strategic view of all Minerals and Waste projects across the area covered by this plan and facilitate collaborative working between the two streams i.e. minerals and waste.	1	This is an issue for the Plan team and so this comment will be passed to them.
There are a number of voids in the area which need to be filled and also a number of coal mines with large amounts of colliery spill that have nowhere to tip this.	1	This is an issue for the plan team to consider in planning for facilities.
We would like to be involved in further rounds of consultation.	1	Consultees who have expressed an interest in the Joint Minerals and Waste Plan will be updated as the Plan progresses.
Add the following sub-objective: 'Encourage the reuse or adaptation of existing buildings'.	1	This is generally covered by Objective 9 but the comment has been passed to the plans team for consideration as an option / policy.
Add the following indicator, 'Number of existing buildings adapted or reused'.	1	Number of buildings reused for minerals and waste purposes will be very low, this is more relevant to local plans.
The SA objective relating to the historic environment is repetitive. Change to: 'Conserve and enhance the historic environment, heritage assets and their settings'.	1	Noted, this will be changed.
The term 'landmark' monuments should be removed from the assessment framework.	1	Noted, this will be removed.
A sub-objective should be added that recognises the historic importance of York.	1	A sub-objective to protect the setting of York will be added to this objective.
None of the indicators will monitor to impact that the policies will have on the historic environment.	1	The indicators contained in the Scoping Report will be used to help assess options and policies. Indicators for monitoring the sustainability effects of the Plan will be developed later in the Plan production process.
Add the indicator: 'Number of minerals or waste developments impacting upon the elements identified as contributing to the special character or setting of York'.	1	Reference to York will be included within the first sub-objective of objective number 10. The impacts on historic assets of York should be considered in line with historic assets across the rest of the Plan Area. These issues will also be addressed though monitoring later in the SA process.
The indicator detailing the number of visits to historic sites should be deleted as it provides little useful information.	1	This indicator can also provide information about tourism in the Plan Area, so will be included for these purposes. Indicators for

		monitoring the effects of the Plan will be established later in the SA process.
A sub-objective relating to ensuring a steady supply of local stone should be included within the framework.	1	Comments noted - the sub-objective and indicator will be added.
English Heritage advises that conservation and archaeological staff at the authorities are closely involved in the SA process.	1	Conservation and archaeological staff will be consulted on drafts of SA reports during drafting and through the site assessment methodology process.
The Plan should take account of the Waste Hierarchy.	1	Comments noted. This is reflected within SA objective 9.
The approach to call for sites is welcomed, as is the sustainability appraisal.	1	Comments noted.
The statement, 'Water quality is generally good with the main reasons for poor quality linked with agricultural farming practices' should be removed, or justification provided.	1	This relates to sustainability issues in York only. The source of this information is Yorkshire Water's water quality report.
Restoration schemes should avoid infilling of quarry voids in order to protect groundwater.	1	The specific types of restoration will be considered/developed by the Plan and not the SA. However the SA will help ensure that any schemes proposed are in line with environmental good practice.
The main documents associated with groundwater are all captured.	1	Comments noted.
The Humber River Basin Management Plan should be taken into account.	1	The Humber RBMP is taken into account specifically within the report and PPPSIs. Water bodies affected by the Plan are taken into account within sustainability objective number 2.
Issues surrounding siting of development and Groundwater Protection Zones should be taken into account.	1	These issues will be explicitly taken into account as part of the site assessment methodology, which will be consulted on in due course.
The sustainability issues identified are not relevant.	1	Comments noted. The issues that are mentioned are all sustainability issues that are relevant to the Plan area and have been identified by the SA scoping report already. The objectives are based on sustainability issues that are relevant to the Plan area and have been developed by taking into account data on the current condition across the Plan area (in the Baseline) and also any published plans, policies, programmes or initiatives. The policies in the Plan will be assessed against SA objectives but must also take forward national policy relating to waste management and facilitating the supply of minerals.

4 Joint Minerals and Waste Plan Sustainability Appraisal Workshops Outcomes

In order to provide core technical stakeholders with an early opportunity to get involved in the preparation of the Minerals and Waste Joint Plan, two technical consultation events were organised to focus on the Sustainability Appraisal Scoping Report, specifically the draft sustainability appraisal objectives, sub-objectives and indicators, as well as the draft site assessment methodology.

The first event took place on Friday, 7th June, 2013 at the City Of York Council offices, and was attended by 6 stakeholders. The second event took place on Wednesday, 12th June at North Yorkshire County Council's offices and was attended by 8 stakeholders. There were 2 sessions held in each workshop. Session 1 focused on discussion of the sustainability appraisal objectives, sub-objectives and indicators in facilitated groups (the details of which are provided within appendix 3) in order to gauge whether the relevant issues had been taken into account. Different groups focussed on different sections of the social, economic, environmental and cross cutting SA objectives. Session 2 focussed on the site and areas assessment methodology. In this exercise, the delegates were split into two groups – one group focussed on the assessment of a proposed minerals site and the other the assessment of a proposed waste site. Each group used the draft site assessment methodology in order to determine whether the methodology was sufficient in order to make a comprehensive assessment of each site, and if not, additional and/or revised measures were suggested by participants.

The results of both workshop sessions from both events are detailed in appendices 2 and 3, as stated above. The outcomes of the workshops include the revised sustainability appraisal framework (please see appendix 4) and also input to the site and areas assessment methodology. The consultation of the draft site and areas assessment methodology took place from 31st July, 2013 to 16th September, 2013³. The consultation responses and workshop comments received during the consultation period and workshop events are currently being taken into account and a final Site Identification and Methodology Report will be published in due course.

³ See the Site Identification and Assessment Methodology here: northyorks.gov.uk/CHttpHandler.ashx?id=25564&p=0.

5 Outcomes of the 2011 North Yorkshire Minerals and Waste Development Framework Consultation

During the summer of 2011, North Yorkshire County Council consulted on a suite of documents to inform the preparation of both the Minerals and Waste Core Strategies, which the Council had begun to prepare prior to the decision to produce a Joint Plan. The following documents related to the SA formed part of that consultation:

1. Minerals Interim Sustainability Appraisal Scoping Report;
2. Waste Sustainability Appraisal Scoping Report; and,
3. Waste Core Strategy Habitats Regulations Assessment Methodology.

These documents were issued for consultation for 10 weeks from Monday 25th July to Friday 30th September, 2011. In addition to the consultation on the scoping documents, a consultation event was organised to focus on the Waste Core Strategy Sustainability Appraisal Scoping Report, specifically the draft sustainability appraisal objectives, sub-objectives and indicators on Monday, 18th July, 2011 at the North Yorkshire County Council premises at County Hall, Northallerton. There were 2 sessions held. Session 1 focused on the key issues and opportunities associated with waste, while Session 2 allowed delegates to discuss the Sustainability appraisal's objectives, sub-objectives and indicators in facilitated groups.

Following this consultation, all comments received on the Minerals Interim Sustainability Appraisal Scoping Report, the Waste Sustainability Appraisal Scoping Report, the Waste Core Strategy Habitats Regulations Assessment were analysed. In addition to this, comments received during the Waste Sustainability Appraisal Workshop were also analysed and several sustainability objectives and their associated sub-objectives and indicators were altered to reflect these comments.

This earlier consultation work helped provide the starting point for many aspects of the Joint Plan SA scoping report. It has been taken together with consideration of earlier sustainability appraisal work carried out on Local Plans in York and the North York Moors and has informed the key aspects of the Scope, including the Sustainability Appraisal Objectives.

For a description of how the former SA objectives arrived at through consultation have informed the Joint Plan's SA objectives please see Volume 3 (Appendix IV) of the SA Scoping Report.

6 Conclusions

Following the period of consultation, all comments received on the Joint Plan Sustainability Appraisal Scoping Report and the comments received on the sustainability appraisal framework from the two workshop events have been analysed. This has resulted in several of the sustainability objectives, sub-objectives and draft indicators being altered and/or added to, to reflect these comments, and the finalised framework can be seen within appendix 4 of this report. The amended objectives will be used during the appraisal stages to guide the assessment of each policy option.

A number of other changes have also been made to the three documents that formed the Scoping Report (the main report, the baseline data and information and the appendices volume of the report) based on the comments received, including amendments to the text for clarification. The SA team have also taken the opportunity to update the SA document where data has been superseded since publication (for instance in the baseline data and in the list of Plans, Policies, Programmes, Strategies and Initiatives).

All changes to the Joint Minerals and Waste Plan Sustainability Appraisal Scoping documents have been incorporated into a revised Sustainability Appraisal Scoping Report.

Appendix 1: Joint Minerals and Waste Plan Sustainability Appraisal Scoping Report Consultation Outcomes

A response form specific to the Sustainability Appraisal Scoping Report was produced for feedback. In addition, consultees had the option to respond to a question on the Regulation 18 response questionnaire (produced by the Joint Minerals and Waste Planning Team) and could also submit general comments by other means. The statutory consultee comments are highlighted within the tables and the comments from other organisations and members of the public are coded in order to protect individuals' identities. The responses are detailed below, in order of question number. In addition, the bottom section of this table details all the comments that were not submitted as part of the questionnaires.

Respondent	Comments	SA Team Response
Question 1: Do you agree with the general approach we are taking towards sustainability appraisal?		
SA01	Provided that conclusions are based on current sustainability appraisal in the light of current opportunities / situations etc. and not historic commitments (e.g. AWRP incinerator at Allerton Park)	Comments noted. This sustainability appraisal is a new appraisal. Although a limited amount of information has been taken from previous sustainability appraisal work, the assessment work that will be carried out will be an entirely new and original exercise, undertaken against a new set of SA objectives, informed by a new baseline for a new plan area. There is no obligation to repeat any historical assessment findings. The plan will not be reassessing AWRP.
SA13	No. You fail to explain why the earlier NYCC exercise was abandoned in 2011. You fail to include the recommendations from the Stakeholder Meeting held in Northallerton in October 2011.	Responses will be included in consultation outcomes report.
SA13	You should use the full Brundtland definition of sustainability.	This is included in section 3.1
SA13	You omit considering the importance of not pre-empting choices for future generations.	The SA will enable informed decisions to be made in determining future provision for minerals and waste development up to 2030.
SA13	You do not consider the impact of likely demographic, behavioural and technological change on volumes of waste and rates of recycling.	This will be considered through the waste evidence work being produced for the Plan
SA13	Your assumption that NYCC already has valid waste and recycling forecasts is not substantiated.	This will be considered through the waste evidence work being produced for the Plan
SA13	You do not set out the way your conclusions will be submitted to public consultation for further consideration.	Sustainability appraisal update reports will be consulted upon prior to a consultation on the Sustainability Report
SA13	You have not allowed sufficient time for this consultation.	Five weeks is the standard period for consultation on the SA scoping report (six weeks were allowed for this consultation).

SA14	No. It omits an objective of getting the best value for money among the objectives.	Publically funded development costs are considered alongside the SA and consultations. In addition, most minerals and waste developments are privately financed.
SA14	In our current economic situation of austerity the cost of the Joint Plan is critical and we should choose solutions that balance sustainability objectives with pragmatism.	Publically funded development costs are considered alongside the SA and consultations. However, minerals developments are privately funded. Objective 12 will provide balance to other objectives to ensure that addressing other objectives does not unnecessarily jeopardise sustainable economic growth (a pragmatic approach).
SA14	We should choose the best options available within budget constraints.	Publically funded development costs are considered alongside the SA and consultations. AWRP has already been awarded planning permissions, and minerals development is privately funded. Most minerals and waste developments are privately financed.
SA14	If there are cheaper solutions providing equal or better outcomes they should be chosen.	Publically funded development costs are considered alongside the SA and consultations. AWRP has already been awarded planning permissions, and minerals development is privately funded. Most minerals and waste developments are privately financed.
SA14	It might be an idea to indicate in the plan what is best and what is chosen and why. The why element of the answer will usually be affordability. Then we (the stakeholders) would have a clear understanding of the choices made in the Plan.	The SA will give a clear indication of the relative merits of different options as they pertain to sustainability
SA14	Secondly we do not see anything about flexibility and the ability to respond to changing priorities and new demands.	This issue will be addressed within the plan.
SA14	It is quite possible that new environmental risks are identified, new political policies developed, new taxes imposed (e.g. a carbon tax) so whatever choices are made they should allow for change.	This issue will be addressed within the plan, which will need to include an element of flexibility.
SA14	Thirdly we believe that gaps identified in this report, particularly with respect to waste volumes, forecasts and treatment technologies should be added and issued for public scrutiny before we can be happy towards the general approach.	Forecasts are being carried out as part of the plan.
SA15	a. No. You have not properly explained why the	The event referred to was a plan

	earlier NYCC exercise was abandoned in 2011 or why the recommendations from the Stakeholder Meeting held in Northallerton in October 2011 were ignored by NYCC.	consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in the Consultation Outcomes document. The SA builds upon recommendations made in previous SA related consultations
SA15	b. You should use the full internationally accepted Brundtland Commission definition of sustainable development, as adopted in UN Resolution 42/187. This is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs".	This is used in section 3.1.
SA15	c. You fail to consider the importance of not pre-empting choices for future generations, something that is clearly demanded by the Brundtland definition.	The Sustainability Framework builds upon the Brundtland definition and sustainability issues derived from a wide range of plans and baseline data. Therefore the SA objectives and sub objectives should be seen as a more detailed set of goals to achieve sustainable development within the specific plan area. Together they aim to meet present generation's needs without constraining the ability of future generations to enjoy a similar or improved quality of life.
SA15	d. You do not consider the impact of likely demographic, societal, behavioural and technological change on volumes of waste and rates of re-use and recycling.	These assessments for future waste arisings are currently being carried out.
SA15	e. You wrongly assume that NYCC already has valid waste and recycling forecasts. The reality is that they are already largely discredited. You should recognise that the future is inherently uncertain and adopt one of the established techniques for dealing with such uncertainty.	These assessments for future waste arisings are currently being carried out.
SA15	f. You do not set out the way your conclusions will be submitted to public consultation for further consideration.	There will be three more rounds of consultation during appraisal of the Plan. These will be at the Issues and Options, Preferred Options and Publication stages of the Plan preparation.
SA15	g. You have not allowed sufficient time for this consultation.	The statutory time for consultation is five weeks, although six weeks were allowed for this consultation.
SA18	The joint plan is an opportunity to aim for enhancement of environments rather than simply sustainability through appropriately directed coordination and management of environmental	This may be carried out through restoration plans and is assessed across a number of SA objectives.

	issues.	
SA19	The joint plan is an opportunity to aim for enhancement of environments rather than simply sustainability through appropriately directed coordination and management of environmental issues.	This is taken into account under sustainability objective number 1.
SA22	The Sustainability Appraisal appears to be generally consistent with the SA Regulations and requirements.	Comments noted.
SA23	Yes. In particular the RSPB supports: Draft Objective 1 (p.3) – Protect and enhance biodiversity ... and improve habitat connectivity.	Comments noted.
SA34	i. The general approach is very formulaic and follows exhaustively a set of local, national and international requirements. We think you could be more direct about the key issues that face sustainability appraisal in the context of the specific issues that surround minerals and waste, instead of a catch-all approach that seeks to assess everything.	This is the requirement of SEA and SA, whose approach we must follow.
SA34	ii. The appraisal notes in its summary that the quality of the landscape, our wildlife and historic assets are most significant. That being the case, you must ensure that you have the correct tools to quantify the value of these different assets.	We have used nationally available indicators where possible and also data relating to the Plan Area from the relevant authorities in order to measure the impact on these assets.
SA34	iii. You use, quite rightly, the World Bank definition of sustainability (then needlessly go on to recite other, more recent definitions). If this is the central plank of your approach, then you have to think harder about how you will actually define the needs of the present, and also demonstrate that by doing something today, you will not be stopping future generations making their own decisions. This is a very difficult thing to do and something that you come no-where near in the present document. You should think carefully about precisely how you are going to ensure that your Plan conforms to the preferred definition of sustainability. By the time one has read this document, the original definition has been lost.	The variety of definitions of sustainability are all relevant to this SA. It should be recognised that we must make some decisions now regarding future development of minerals and waste, taking into account the most sustainable options for future generations.
Question 2: Do you think the supporting assessments being carried out are sufficient for this sustainability appraisal?		
SA01	No mention that high quality farmland in Vale of York is susceptible to contamination from nanoparticles in air because of area's tendency to be misty and foggy with limited air circulation.	Reference to local climatic conditions has been added to the air quality section of the baseline.
SA01	No mention of routes used by mineral/waste transfer should not aggravate air quality in AQM areas.	Air Quality Management Areas are listed in the Baseline document and an indicator on the number of AQMAs is included in the SA Framework alongside the SA sub objective 'Avoid locating development in areas of existing poor air quality where it could result

		in negative impacts on the health of future occupants/users'.
SA01	Mitigation measures, improvement of support for heritage sites should be where there is reasonable public access - not just to improve private estates for private landowners who do not give public access.	Comments noted. Specific measures for mitigation will be considered in the Sustainability Report, however it is felt that the sub objective to SA objective 10 'to improve access to, and enjoyment of, the historic environment where appropriate' should allow for consideration of any need to avoid or mitigate for any potential conflicts with public access.
SA13	No, there is a lack of forecast for waste arisings and recycling volumes.	Forecasting is being carried out as part of plan preparation.
SA13	No, there is a lack of analysis of alternative waste treatment systems available to drive waste treatment up the hierarchy. The vertical segments of the hierarchy should be subdivided to show that thermal MBT and similar systems are more environmentally friendly than Incineration and EFW.	The standard EU/PPS10 waste hierarchy is used. Annex I and II of the Waste Framework Directive define disposal and recovery in detail, distinguishing between incineration on land (which is classified as disposal) and recovery of energy (defined as recovery).
SA13	No. There is a lack of analysis of predicted overcapacity of Incineration and EFW (see Eumonia forecasts).	Forecasting is being carried out as part of plan preparation.
SA13	No. there is a lack of analysis of the future demand and benefit of RDF.	Forecasting is being carried out as part of plan preparation.
SA13	No, there is a lack of analysis of the growing demand for RDF and the growing capacity for waste treatment north and south of the plan area.	Forecasting is being carried out as part of plan preparation.
SA14	No. The Sites and Areas assessment methodology is not yet done. There seems to be little assessment work being carried out based on 3.4.	The consultation on this was carried out in summer 2013.
SA14	We cannot see information on waste volumes and their location and forecasts of waste for the future together with the assumptions made and alternative projections. We cannot see how a sustainable policy can be developed without the data.	Forecasts are being carried out as part of the plan production. The SA will be required to include predictions of the likely evolution of environmental, social and economic assets with and without policies in the plan.
SA14	Similarly there is no information about waste treatment methods both present and in development.	Waste technical papers and topic papers contain this information, and are available as part of the plan evidence base at www.northyorks.gov.uk/mwevidence .
SA14	Nor is there an evaluation of the trend of political change towards waste management and pollution.	The Defra 2011 waste policy review is included, in addition to the NPPF and PPS10 which contain government policies on waste

		management.
SA15	a. No, There is a lack of forecast for waste arisings and recycling volumes – see point ‘e’ above.	These forecasts are currently being carried out as part of Plan production.
SA15	b. No, You do not offer adequate of analysis of alternative waste treatment systems available to drive waste treatment up the hierarchy. The vertical segments of the hierarchy should be subdivided to show that thermal MBT and similar systems are more environmentally friendly than Incineration (especially without CHP) and EFW.	These issues will be considered as part of production of the Plan, rather than the SA. The standard EU waste hierarchy has been used within this report.
SA15	c. No. You do not analyse the predicted overcapacity of Incineration and EFW (see Eunomia forecasts.) At the minimum, there should be a scenario approach, coupled with the use of regret criteria in the analysis.	Work is currently being carried out on future waste arisings across the Plan Area.
SA15	d. No. You should analyse of the future demand for and benefit of RDF and likely regional capacity both to the north and south of the plan area. Failure to do so means ignoring its sustainability credentials and opportunities to gain flexibility at relatively modest cost (this helps avoid compromising the ability of future generations to make their choices.	We can't expect other LA areas to take waste from the Plan Area, therefore we need to ensure there is enough provision across the Plan Area, which is carried out as part of the Plan preparation process.
SA18	It should be stressed that almost all of the world's heather moorland is found in the UK. This terrain contains unique species found nowhere else in the world - declines in this species could lead to global extinction. The report 'State of Nature' states that 65% of moorland species studied have declined and 35% have declined strongly [referenced link to State of Nature report].	Comments noted. SSSI condition is noted within the baseline information and SA objective 1 seeks to protect biodiversity.
SA19	It should be stressed that almost all of the world's heather moorland is found in the UK. This terrain contains unique species found nowhere else in the world - declines in this species could lead to global extinction. The report 'State of Nature' states that 65% of moorland species studied have declined and 35% have declined strongly [referenced link to State of Nature report].	Comments noted. SSSI condition is assessed within the baseline information.
SA22	The supporting assessments are sufficient.	Comments noted.
SA34	a. They do not provide any indication of the future changes expected in waste arisings and recycling volumes	Agree. Work on waste projections is being undertaken as part of the production of the Plan. A summary of predicted future trends for different topic areas in the SA baseline has been added.
SA34	b. They do not provide an assessment of the existing capacity for treating waste at different levels in the waste hierarchy.	Work on waste projections is being undertaken as part of the production of the Plan. Information relating to the capacity of treating different waste options is included in section 14 of the Baseline where landfill, energy from waste, anaerobic

		digestion and recent additions to capacity for other facilities are noted.
SA34	c. There is a near complete absence of any information regarding the regional context of North Yorkshire. It is as though the County were an island, cut-off from its neighbours. Even the Dales National park is excluded. This inevitably creates an inward looking feel to the analysis in which placing things in context is very difficult.	Comments noted/agree in part. Further consideration of the sustainability of waste processing at a sub regional / regional level should also be considered during the assessment. The Yorkshire Dales is not part of the plan area, but will be treated in the same way as other adjoining authorities in this scoping report. The evidence base for the plan can be found at: www.northyorks.gov.uk/mwevidence .
Question 3: Do you agree with our review of plans, policies, programmes and initiatives (PPPSIs)? Are there any PPPSIs that we have not considered?		
SA01	Too many bits and pieces to reach a conclusion. How could I possibly know? I doubt the Minister for the Environment knows!	The Strategic Environmental Assessment Directive and Government guidance on Sustainability Appraisal requires that all relevant plans, policies, programmes and initiatives at an international, European, national, regional and local scale that are relevant to the plan should be included. For a plan which is outlining minerals and waste development the list is comprehensive due to the many environmental, economic and social issues that this kind of development can influence. However, the key messages from all of the PPPSIs considered are distilled down into a relatively short list within the main scoping report document, so that members of the public and consultees can see, more easily, the key issues that the Sustainability Objectives should be taking into account.
SA13	There are so many documents that pieces can be extracted to reach almost any conclusion. Furthermore the new tend to contradict or overrule the old.	The SEA Directive requires us to look at all relevant PPPSIs and informs the range of objectives.
SA13	However in Waste terms the themes which keep emerging are Waste prevention, waste minimisation, recovery, recycling, separation of elements for re use, distributed treatment system located adjacent major	As part of this process, we report what is in all relevant PPPSIs. PPS10 (national planning policy) and relevant waste legislation is

	waste producing areas, minimising waste transport distances, the importance of RDF as the final element of the treatment process. You fail to highlight this.	included and these refer to the various stages of the waste hierarchy mentioned in this response.
SA14	Broadly yes. A proper answer to this question would require a level of knowledge that encompassed not only knowledge of the plans, policies, programmes and initiatives proposed but also other possible alternatives. Our Parish Council does not have this level of knowledge and there is not time to consult experts.	Comments noted.
SA15	<p>There are so many documents that pieces can be extracted to reach almost any conclusion; is that the intention? Moreover, newer documents tend to contradict or overrule the old. Even so, the themes that emerge for waste are:</p> <ul style="list-style-type: none"> • Waste prevention • Waste minimisation • Reuse and recovery, including separation of elements for re use • Recycling • Distributed treatment system located adjacent major waste producing areas (Proximity Principle) <p>Minimising waste transport distances (the Proximity Principle again)</p> <ul style="list-style-type: none"> • The importance of RDF as the final element of the treatment process <p>These are broadly consistent with the recommendations from the Stakeholder Meeting held in Northallerton in October 2011. You should highlight this but fail to do so.</p>	The SA Framework is consistent with the Waste Hierarchy and therefore promotes the issues highlighted. In addition a transport objective is included that promotes proximity to markets. Previous consultation exercises in relation to the SA have been taken into account. The comment will also be passed on to the Plans Team. The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in the Consultation Outcomes document.
SA22	The District Council broadly agree with the review of plans, policies, programmes and initiatives.	Comments noted.
SA22	The District Council suggests that any HRA/Appropriate Assessment work undertaken to support Development Plan preparation should be included.	HRA will be carried out on the Joint Plan. AA will be carried out if needed.
SA23	Table 3: Omits the EU Habitats Directive and the Birds Directive. Refers to the England - Biodiversity Strategy Climate Change Adaptation Principles (Defra, 2008) but not to the England Biodiversity Strategy itself.	The Habitats Directive and Birds Directive are included within the PPPSIs and in the baseline report. The England Biodiversity Strategy is referred to by its name 'Biodiversity 2020'.
SA34	This section clearly took a lot of time and effort, but to what end is not clear. Policies overlap and duplicate, sometimes they are contrary to each other. This review needs to be much more strategic and much less "catch-all". What are the particular PPPSIs that genuinely have traction with regard to the future	The assessment must address a wide range of social, economic and environmental topics including those issues defined by the SEA Directive. While this leads to a lengthy list of PPPSIs it should be noted that only relevant objectives of this policy context are drawn out in the

	minerals and waste provision in the County? The approach here is to say “everything” – but that is next to useless. What is required is a sensible approach to sift those PPSIs that actually matter to the exercise being conducted or better still, to distil from these the over-arching messages that relate to minerals and waste. For the latter there are clear message that relate to the need to prevent, reduce and re-use, to recover and recycle, to value waste as a resource, to reduce waste transport distances. Indeed, reading this reminds one just how wrong the proposed AWRP is for the County.	analysis. The evidence base for the Plan focuses more closely on minerals and waste (view the evidence base at: www.northyorks.gov.uk/mwevidence).
Question 4: Do you agree with the key messages from the PPPSI review?		
SA01	What's not to like? Maybe something about economic viability and effectiveness of strategies that is properly evaluated.	Comments noted. The key messages are based on evidence gathered from all relevant PPPSIs, including a number of economic PPPSIs.
SA13	Broadly yes . They are: waste prevention, waste minimisation, recovery, recycling, separation of elements for re use, distributed treatment system located adjacent major waste producing areas, minimising waste transport distances, the importance of RDF as the final element of the treatment process.	Comments noted
SA13	A key issue is full participation by the public in development of the local area BUT this must be real. Planners and Councillors must respond to local views, not just over rule them.	We aim to address all views expressed, but must also take on board all national policy and legislation.
SA14	Yes. We think this section is well laid out.	Comments noted.
SA14	We think that the all parties should be included including other authorities within the area – the District Councils – and outside the area where appropriate such as for waste disposal facilities.	The district councils are not the minerals and waste planning authorities, although proposals are discussed with these councils. In addition, relevant local authority plans are included. Discussions and consultations are taking place with adjoining, and more distant where relevant, minerals and waste planning authorities.
SA14	“The National Planning Policy Framework provides that Local Plans should plan positively for the infrastructure required in the area to meet the objectives, principles and policies of the NPPF and that local planning authorities should work with other authorities and providers to: - assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and	Adjoining authorities, in addition to NY district councils have been consulted as part of the plan process.

	<p>- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p> <p>We would add not only the District Councils within the Joint Plan area but also the authorities lying just outside the boundaries particularly Teesside to the north and South Yorkshire to the South.</p>	
SA15	<p>We agree in broad terms with the key messages which I see as those listed in the answer to the previous question (waste prevention, waste minimisation etc.</p>	<p>Comments noted.</p>
SA15	<p>A key issue is the need for full participation by the public in development of the local area. However, this must be real; more sham consultation simply will not do. Planners and Councillors must respond to local views, not simply over-rule them.</p>	<p>There are more opportunities for the public and stakeholders to be consulted as the plan progresses. All views will be considered alongside Government policy.</p>
SA22	<p>Agree with the key messages. However, Local Plans/Development Plans are a consistent source of information and feed into the key messages. In Table 5 - Key messages from the PPPSI review, Local Development Frameworks/Local Plans are listed in the 'main sources' column for the first eleven key messages. They should also be listed in the 'main sources' for the following key messages: promote employment, including a shift from public to private sector jobs investment; support a low carbon economy; develop strong, attractive and thriving neighbourhoods and societies (the Big Society) and encourage public participation in the development of the local area; protect and enhance geological diversity; ensure continued economic viability and access to services for rural areas; recognise the importance of protecting the best and most versatile agricultural land and fertile soils; protect coastal landscapes and biodiversity; protect open space for community benefit; ensure high quality design of built infrastructure.</p>	<p>Comments noted / agree.</p>
SA23	<p>The RSPB supports the key message to protect and enhance biodiversity (Table 5, p.25). However, Table 5 does not identify all of the key messages relating to protecting and enhancing biodiversity that should come out of the PPPSI review. In particular Table 5 should directly refer to the following key messages: Halt the loss of biodiversity (England Biodiversity Strategy (EBS)); Provide 'bigger – better – more – connected' wildlife sites (EBS / Lawton Review); Deliver a net-gain in biodiversity (NPPF para. 9 and 109); Establish coherent ecological networks that are more resilient to current and future pressures (EBS / Lawton Review / NPPF (para. 109); Plan for biodiversity at a landscape scale across local authority boundaries (EBS / Lawton Review / NPPF</p>	<p>Comments noted. These will be included in the finalised scoping report. In the PPPSI review of the Lawton Report is not specifically mentioned as this is taken forward as policy in Biodiversity 2020.</p>

	(para. 117).	
SA34	To be honest, we are not sure what the key messages are from the PPSI. This is because although there are key messages for each section of the review, there is no holistic review of the relative merits of one set of messages over another. So, as noted above, you should be more strategic and synthetic in how you review these PPSIs.	Disagree. Many PPPSI have targets, therefore we have taken all targets into account and synthesised their requirements in the key messages review. This in turn has informed the development of holistic and strategic SA objectives.
Question 5: Do you think that we have gathered baseline information appropriate to the plan area?		
SA01	Probably relevant information in there somewhere. How will you decide which bits to use? And how current and accurate is it?	The information is providing the overall picture for the state of the plan area. Minerals and waste specific evidence will inform the plan.
SA01	How can the public/non expert give a reasonable view on all this?	Comments noted. A non-technical summary is provided as part of this Sustainability Appraisal, although it is noted that this summary could go into further detail on the report in order for a lay member of the public to provide a reasoned view on the work carried out.
SA01	Would benefit from an analysis of current trends/future projections regarding, say waste minimisation and impact on rubbish generated.	The Sustainability Appraisal provides an assessment of the effects of the Joint Plan and alternatives to the Joint Plan that will be considered. As part of the Plan production, an analysis of trends and projections on minerals and waste issues will be made. A summary of predicted future trends for different topic areas in the SA baseline has been added.
SA13	No, it lacks adequate forecasting of: -Mineral and Aggregate requirements and Waste Volumes. -Trends in Treatment systems. -Trends towards overcapacity of incineration and EFW. -Trends in export of waste to Europe. -Trends in waste treatment costs and recovered element prices.	Forecasting is being carried out as part of plan preparation.
SA14	No. There are areas that have specific climatic conditions that affect health. The Vale of York is known for fog and poor air quality.	Air quality, in addition to health is included within the SA objectives. Reference to local climatic conditions has been added to the air quality section of the baseline.
SA14	It seems that the information is that already available. We wonder if there are experts - from central government, other local government areas, universities who could give a professional view of the	Comments noted.

	completeness and quality of information given to us.	
SA14	<p>Section 5 page 33.</p> <p>The topics covered by the baseline have been informed by the SEA topics (as contained in Annex I(f) of the SEA Directive). These are biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape. We cannot see information on waste volumes and their location and forecasts of waste for the future together with the assumptions made and alternative projections. We cannot see how a sustainable policy can be developed without the data. Similarly there is no information about waste treatment methods both present and in development. Nor is there an evaluation of the trend of political change towards waste management and pollution.</p>	<p>Forecasts are being carried out as part of the plan. The SA will be required to include predictions of the likely evolution of environmental, social and economic assets with and without policies in the plan. A summary of predicted future trends for different topic areas in the SA baseline has been added</p>
SA15	<p>No it lacks adequate forecasting of;</p> <ul style="list-style-type: none"> • Societal and behavioural changes • Mineral and Aggregate requirements • Waste Volumes • Trends in Waste Treatment systems • Trends towards overcapacity of incineration and EFW • Trends in export of waste to Europe • Trends in waste treatment costs • Future European Directives impinging on waste management • Likely future recovered element prices • Market trends and possible saturation in demand for waste products (e.g. aggregates) 	<p>This work is currently being carried out as part of preparation of the Plan. A number of societal and behavioural changes are covered in the baseline.</p>
SA22	<p>The baseline information is appropriate to the Plan area. However, in “6 SEA Topic /SA Category – Air” in the Baseline report p52, the AQMA in Ryedale is “Butcher Corner”. The Natural England National Character Areas information (Baseline report p 24-25 and Appendices p64) needs to be updated. More publications (e.g. Howardian Hills) are now final and available on the Natural England website.</p>	<p>Comments noted, these will be updated.</p>
SA23	<p>The RSPB supports the inclusion of baseline information on international, national and local nature conservation designations in the biodiversity section of Table 6 (p.34). The RSPB is particularly pleased to see baseline information on priority habitats and reference to the fact that these habitats are fragmented and could be better connected. The table should also refer to landscape-scale conservation initiatives within the Plan area and biodiversity opportunity areas that have been identified within the Plan area.</p>	<p>Comments noted. These will be amended and included in the finalised scoping report.</p>
SA34		<p>A summary of predicted future trends for different topic areas in the</p>

	The baseline data does not consistently assess the likely needs of future generations and therefore fails the key test of sustainability. If the plan is to 2030, then there needs to be baseline information from now to then.	SA baseline has been added A detailed analysis of effects on the baseline to 2030 will be required in the Environmental Report.
Question 6: Have we identified appropriate sustainability issues? Are there any other sustainability topics or issues we should consider?		
SA01	End products of waste treatment should be suitable to backfill extraction of minerals.	Decisions on process options/waste treatment, etc. will be made by the Joint Plan team (rather than suggested by the Sustainability Appraisal). However, the SA will evaluate the predicted effects of any proposed option in relation to this.
SA13	You should use the Brundtland definition.	The Brundtland definition is used in section 3.1
SA13	You do not address the need for suitably treated waste to provide cover for extraction site restoration.	This is a detailed issue to be taken account of as part of the plan and is covered by objective 9.
SA14	The topics appear to be comprehensive but I do not see anything about flexibility and the ability to respond to changing priorities and new demands.	There will be an element of flexibility built into the plan.
SA14	It is quite possible that new environmental risks are identified, new political policies developed, new taxes imposed (e.g. a carbon tax) so whatever choices are made they should allow for change.	There will be an element of flexibility built into the plan.
SA15	You should use the Brundtland/UN Resolution 42/187 definition.	This is used and referred to in section 3.1 of the scoping report.
SA15	You fail to address the interaction between minerals and waste policy, e.g. the need for suitably treated waste to provide cover for extraction site restoration.	This work will be carried out as part of preparation of the Plan. However, it is recognised that greater links between minerals and waste could be made in objective 9 by including a sub objective 'Recognise and promote the value of waste streams as alternatives to primary mineral extraction'
SA22	The sustainability issues are appropriate.	Comments noted.
SA34	See comment above.	See SA Team response above.
SA34	In addition, although individual issues are identified, collective issues are not. You cannot treat the County like a set of unconnected elements – there needs to be some integration whereby you synthesise the different datasets into a coherent spatial and temporal	It is not for the SA to propose a spatial and temporal model at this stage. Rather it is the plan itself which will decide upon the 'how and where'. The SA will critique and challenge the approach, and may propose alternative spatial/temporal approaches based on a bringing together of datasets. However, this is not possible until the appraisal of options commences. The evidence base for the Plan focuses more closely on minerals and waste (view

	model. This has not been done or even tried. Therefore, the document at present fails to provide the spatial and temporal data required to assess the how and the where of future minerals and waste development.	the evidence base at: northyorks.gov.uk/mwevidence .
Question 7: Do you agree with the sustainability objectives and sub objectives? Can you think of any further indicators we should add to the SA framework?		
SA01	Far too many. It is impossible to cover everything. You have to choose. Should there be criteria to balance competing objectives?	The intention of the Scoping Report (which formed this consultation) is to outline all the key sustainability issues relevant to the Joint Plan. The objectives list key outcomes which we should be aiming to achieve as part of the Joint Plan. The next stages of the Sustainability Appraisal will take into account alternative options for minerals and waste development and the extent to which each objective may, or may not be achieved under alternatives, or options. Inevitably, trade-offs will need to be made between objectives.
SA13	These objectives are too numerous and broad . Some are mutually incompatible. They need refining.	There will always be uncertainties between conflicting objectives, but these still need to be taken into account within the SA.
SA14	The objectives and sub-objectives appear sound.	Comments noted.
SA15	These objectives need refining. As they stand they are too numerous and too broad. Worse, some are mutually incompatible.	It is recognised that some of the objectives are in competition with each other. However, an assessment of cross compatibility and areas of tension is made at section 6.6 and a number of actions proposed to reduce tensions.
SA18	Protection and enhancement of natural environments should go beyond conservation sites. It should apply wherever feasible.	This is taken into account under sustainability objective number 1.
SA19	Protection and enhancement of natural environments should go beyond conservation sites. It should apply wherever feasible.	This is taken into account under sustainability objective number 1.
SA22	Agree with the sustainability objectives and that they are appropriate. However, Sustainability Objective 10 focussed on heritage assets needs a further sub-objective to protect locally/sub-regionally significant non-designated assets of local significance e.g. medieval field systems which are important to the distinctive landscapes in certain parts of Ryedale. And Sustainability Objective 12 on economic growth needs to recognise the relationship of minerals and waste operations with surrounding economic uses - there could be potential conflicts e.g. with the horse	Comments noted. This will be amended to recognise regional and local heritage assets. In addition we agree that surrounding economic uses need to be recognised in objective 12.

	<p>encing industry, agriculture and tourist destinations.</p>	
SA23	<p>The RSPB supports the objective to “protect and enhance biodiversity ... and improve habitat connectivity” (Table 7, p.45) and the associated sub-objectives. The RSPB is particularly pleased to see sub-objectives relating to the creation of priority habitat and the increasing the connectivity between habitats. The aspiration for these sub-objectives should be that they are delivered at a landscape scale to provide coherent and resilient ecological / habitat networks (in line with NPPF, paras. 109 and 117). In addition, there should be a sub-objective that explicitly promotes the delivery of a net-gain in biodiversity.</p> <p>The RSPB supports the draft indicators relating to protecting and enhancing biodiversity.</p>	<p>Comments noted. These will be included in the finalised scoping report.</p>
SA34	<p>You have listed everything you can possibly think of, instead of those that really matter. A huge missing element of this review is the regional and national need for minerals and waste provision. Because most developments cause harm, there is a need to demonstrate that there is a need that offsets this harm. Moreover, since there seems to be a preference for large-scale projects in both minerals and waste (which we note, may not be sustainable – as in Allerton Park), the need for such schemes has to be justified at the regional and, often, the national level. At present there is no rigorous comparison of the local and regional / national need under different indicators. There is therefore no easy way to assess whether the sustainability criteria will be applied in a sensible way or not. Scale matters here – development can destroy the ability of future generations in North Yorkshire to take decisions over their resources, in the name of some claimed regional or national need. These trump cards need to be defined.</p>	<p>Disagree. The SA objectives taken as a whole consider the sustainability of approaches taken by the plan makers as presented, and the SA has the capacity to develop and then assess alternative approaches that may show alternative ways of provision that may be more (or less) sustainable. This may include reliance on facilities in different locations or at different times, or at different scales that may or may not fit better with the environmental, social and economic objectives defined. The evidence base for the plan focusses more on minerals and waste and the needs and requirements for future developments and can be viewed at northyorks.gov.uk/mwevidence.</p>
<p>Question 8: Is there anything else we should consider when we assess options in the Minerals and Waste Joint Plan?</p>		
SA01	<p>Try to do better than last time (2011 consultation) which seems to have been completely ignored.</p>	<p>Input from earlier consultations carried out as part of the separate Minerals and Waste Core Strategies have been taken into account in developing the Issues and Options document.</p>
SA01	<p>Local focus enables local residents to input about their own area which they know more about from experience. Overarching plans are rarely inspiring to encourage local comment.</p>	<p>Minerals and waste development is a strategic issue and therefore needs to be planned at a wider than local scale. However, local knowledge will be taken account of when sites and areas of search are</p>

		assessed.
SA13	You should take note of the recommendations which emerged from Waste Core Strategy stakeholders workshop at Northallerton on 18 October 2011 which showed a strong emphasis to sustainability, using waste as a resource, moving waste treatment up the waste hierarchy, treating waste close to the source (proximity principle), having distributed treatment centres rather than a single massive site, minimising distances waste is transported, supporting local economies with small local treatment centres, using treatment options outside the county boundary, minimising carbon footprint., investigating transport options other than road. In effect that consultation exercise answered the questions which you are raising again.	The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in the Consultation Outcomes document. Most of these issues are covered in the SA Framework. The issues of scales of development are not explicitly mentioned, however, SA objectives such as objective 10, 11 and 17 would challenge sustainability impacts that might arise from infrastructure which is out of scale, while objective 12 includes a range of economic sub objectives that should refine and challenge options that could be improved in terms of their economic benefits.
SA14	I cannot see the inclusion of representatives of District Authorities within the Joint Plan area. They represent the actual population covered by the Joint Plan. These people will have a more detailed knowledge of the issues and needs of their people rather than a purely 'helicopter' view available to North Yorkshire County Council.	They are not minerals and waste planning authorities, but we work with them when the plan is developed.
SA14	So it is important that previous work undertaken on these issues with District Councils, as well as their current views, are given proper weight and inclusion.	They are not minerals and waste planning authorities, but we work with them when the plan is developed.
SA14	<p>"The National Planning Policy Framework provides that Local Plans should plan positively for the infrastructure required in the area to meet the objectives, principles and policies of the NPPF and that local planning authorities should work with other authorities and providers to:</p> <ul style="list-style-type: none"> - assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and - take account of the need for strategic infrastructure including nationally significant infrastructure within their areas." <p>We would add not only the District Councils within the Joint Plan area but also the authorities lying just outside the boundaries particularly Teesside to the north and South Yorkshire to the South.</p> 	Discussions have taken place with district councils and adjoining councils.

SA15	<p>You should take note of the recommendations which emerged from the Waste Core Strategy stakeholders' workshop at Northallerton on 18 October 2011. The public views expressed in the consultations about emerging strategy should be given very great weight. Significantly those views emphasized:</p> <ul style="list-style-type: none"> • A preference for maximising recycling and the reuse of materials • A preference for a number of treatment centres rather than one • A preference for waste treatment facilities to be located close to the major waste producing conurbations, rather than a single remote site • A desire to minimise the distance waste is carried to reduce carbon pollution. • A view that Energy from Waste systems should be used only where the heat output can be fully utilised • A recommendation that NYCC should review and take advantage of waste treatment opportunities outside its county boundaries 	<p>The SA builds upon recommendations made in previous SA related consultations. The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in the Consultation Outcomes document.</p>
SA15	<p>You should be aware that this consultation exercise answered the questions which you are raising again.</p>	<p>As the Plan area has changed since the last consultation in 2011 (with CYC and the NYMNP being involved), this means that the consultation must be carried out again. However, The SA builds upon recommendations made in previous SA related consultations</p>
SA23	<p>Table 61 (p.61) predicts that the objective to 'protect and enhance biodiversity and enhance habitat connectivity' will have major positive effects on the baseline in the long term. However, this is only likely if the long-term management of the restored sites is secured as part of the mineral planning process. Many types of habitat take considerably longer than the statutory five year aftercare period to become well established. If the longer term management of these habitats is not secured then they could easily deteriorate. In some cases the habitats could even be removed and replaced by alternative after uses such as agriculture. Therefore, securing the long term management of newly created habitat on restored mineral sites is a vital part of the mineral planning process.</p>	<p>Comments noted. It should be noted that the table includes only an illustrative example, not an actual assessment. The effect on biodiversity due to the amount of site restoration carried out will be monitored as the Plan is implemented.</p>
Question 9: Is the approach we are taking to the consideration of alternative options appropriate?		
SA01	<p>Nothing much about the consideration of alternative</p>	<p>Options will be appraised at the</p>

	options. Except to say they will be considered against whatever comes out of the consultation. Bit worrying that the Allerton Park planning permission is set out with no other alternatives, existing or to be discussed. Or options for varying what might be sited there in response to new existing capacity, new technologies, much lower gate prices for waste etc.	issues and options stage. Allerton Park cannot be considered as it already has planning permission.
SA13	It is not clear how you are doing this.	Options will be assessed against the SA objectives.
SA14	The method looks simplistic and blunt edged. It is perhaps a useful top level guide but the detail needs to be available to fully understand the choices with something more like detailed percentages and written analysis supporting that percentage score rather than a couple of plus signs.	The scoring system used in the SA follows best practice. However, scoring will be fully explained and supported by evidence, professional judgement and the topics papers.
SA14	Also it would be useful to include options that were ruled out and why.	This will be included in the SA as part of the preferred options stage.
SA15	You don't make it clear how you are doing this. You should start from scratch and not rule anything in or out at this stage. Consideration must include both alternative technologies and alternative distribution of those technologies as well as making use of facilities close to the plan area (e.g. those to the north and south of it mentioned elsewhere in my response.	Section 7.1 outlines how alternatives will be considered, although we accept that this section is not clearly demarcated in the report. Options are being generated as part of the work on the plan. The SA can generate alternative options to those proposed by the plan, though these must be relevant and reasonable to the options presented. If relevant and reasonable, alternative distributions of minerals and waste facilities may be proposed.
SA22	The approach to the consideration of alternative options is appropriate.	Comments noted.
SA34	We cannot understand how you are doing this.	This will be presented at the Issues and Options stage of Plan preparation.
Question 10: Do you have any other comments on the scoping report		
SA01	I do not think that residents who have tried to respond to this consultation will be keen to remain involved. It is too much information, really vague overarching questions and wholly inappropriate as a means of gaining the views of the public. I doubt a PhD on these issues would find it easy/possible.	Comment noted, the information contained in the Scoping Report meets the requirements of relevant legislation. A non-technical summary was included to aid understanding. A separate non-technical summary will be produced to accompany Sustainability Appraisal Update Reports.
SA01	The important questions seem to me likely to come later by which time the general public will have totally lost interest. And there is no commitment to pause the planning permission for a very large incinerator at Allerton Park so it is clear to all this permission will not prejudice the waste strategy.	Allerton Park has already been given planning permission and cannot be reassessed as part of this process. Other waste infrastructure that is needed for the plan area will be considered as part of the SA.

SA13	The data is massive.	Comments noted.
SA13	The credibility of this Consultation is seriously damaged by the abandonment of the previous NYCC consultation exercise in 2011 and the NYCC decision to ignore it and also to pre-empt this consultation by the December 2010 NYCC decision to award to AmeyCespa the AWRP contract for the collection and treatment off ALL North Yorkshire Municipal waste at one site at Allerton Park.	The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in this Consultation Outcomes document.
SA13	The amount of material presented for consideration is very large. The time allowed for response is not sufficient for most people to digest and give proper consideration to it.	The statutory time for consultation is five weeks, however, six weeks were allowed for this consultation.
SA13	The situation is worsened for bodies such as Parish Councils which need to circulate the documents before meeting to respond and may not meet more than quarterly.	The statutory time for consultation is five weeks, however, six weeks were allowed for this consultation.
SA13	The questions are broad and are likely to produce very diverse responses which will be difficult to consolidate.	Comments noted.
SA14	We think it is a very useful document but there has been little time to really analyse it.	The statutory time for consultation is five weeks, although six weeks were allowed for this consultation.
SA14	We are in agreement with the aspirations of the document subject to a balanced assessment of affordability relating to both money constraints and environmental costs.	Objective 12 will provide balance to other objectives to ensure that addressing other objectives does not unnecessarily jeopardise sustainable economic growth.
SA14	Secondly we do not see anything about flexibility and the ability to respond to changing priorities and new demands.	This is an issue for the Plan rather than the SA.
SA14	It is quite possible that new environmental risks are identified, new political policies developed, new taxes imposed (e.g. a carbon tax) so whatever choices are made they should allow for change.	This is an issue for the Plan rather than the SA.
SA14	Thirdly we believe that gaps identified in this report, particularly with respect to waste volumes, forecasts and treatment technologies should be added and issued for public scrutiny before we can be happy towards the general approach.	Forecasts are being carried out as part of the plan and additional evidence is available in topic papers.
SA15	This document should be read in conjunction with our comments on sustainable development in our response to the Minerals and Waste Joint Plan, First Consultation Comments Form.	These will also be taken into account.
SA15	Already the credibility of this Consultation is seriously compromised by your abandonment of the previous exercise in 2011 and the NYCC decision to ignore it and also to pre-empt this consultation by the December 2010 NYCC decision to award to AmeyCespa the AWRP contract for the collection and treatment off ALL North Yorkshire Municipal waste at one site at Allerton Park. If that contract is fully	The event referred to was a plan consultation - previous plan consultations have been taken into account in drafting the Issues and Options document. Previous SA consultations are discussed in the Consultation Outcomes document. It should be noted that, as the Plan

	entered into then this consultation would descend into farce.	Area changed with the inclusion of CYC and NYMNP, the consultation exercise had to be carried out again to meet statutory requirements. The Joint Plan will set policies for consideration of future minerals and waste applications, the AWRP already has planning permission.
SA15	You have presented a huge amount of material for consideration but allowed insufficient time for most people to digest and give proper consideration to it. The suspicion must be that this is a device to stifle proper public participation.	Five weeks is the statutory time to be allowed for consultation. However, six weeks were allowed for this consultation exercise.
SA22	Need to clarify that it is the Mineral Planning Authorities and not the Local Planning Authorities on p52 and in the Baseline report p31.	Comments noted. Amendments will be made.
SA34	These documents are too detailed and lack a strategic over-sight. It is not sufficient to say that you are simply collating all the evidence into one place, from which future plans and priorities will emerge. This is because if you pull everything you can think of into a single publication, then it provides infinite opportunities for future plans. The purpose of this kind of exercise is to undertake a first sift, concentrating on those issues that genuinely matter. That means discarding much that is simply not relevant or unintelligible (some of the tables in the reports are entirely unusable other than to say "we collated the data") and there is little effort to overlay, in time and space, the different indicators under consideration. The scope is, quite simply, far too broad and as such fails to deliver any clear, coherent message.	Relevant evidence for minerals and waste development, which will inform the policies, is set out within the evidence base for the plan which can be viewed at northyorks.gov.uk/mwevidence technical papers. The data for the Sustainability Appraisal outlines the current conditions across the Plan area, and future monitoring will detect any deterioration or improvement in any of the sustainability objectives.
Question 4 from the Regulation 18 Response Questionnaire: Do you have any other comments on the scoping report?		
SA01	It seems amazingly excessive with an astonishing number of reports quoted and summarised, for a public consultation. Really off-putting and very general questions.	Comments noted. A non-technical summary is provided as part of the Scoping Report and separate Non-Technical Summaries will be published alongside Sustainability Appraisal Update Reports at key stages.
SA01	Ultimately, some kind of balance between sustainability and economic viability should be considered.	The intention of the Scoping Report (which formed this consultation) is to outline all the key issues relevant to sustainable development of minerals and waste sites across the Plan Area. The objectives list key issues which we should be aiming to achieve as part of the Joint Plan. The next stages of the Sustainability Appraisal will take into account

		alternative options for minerals and waste development and the extent to which each objective may, or may not be achieved under alternatives, or options. Inevitability, trade-offs will need to be made between objectives.
SA01	I believe that NYCC already knows that previous consultations supported the waste hierarchy on page 9 of the consultation document. Why has this strategy development ignored existing information that is not, I think, even in the massive list of relevant data?	Input from earlier consultations carried out as part of the separate Minerals and Waste Core Strategies has been taken into account.
SA02	Where possible sites should be away from settlements.	A site assessment methodology to appraise the siting of minerals and waste development is currently being developed.
SA02	Transport - most will be by road, lorries must be routed away from settlements. Where possible rail should be used and if appropriate conveyor/pipeline.	A site assessment methodology to appraise the siting of minerals and waste development, which will include possible transport links, is currently being developed. The scoping report also includes an objective for sustainable transport. Sites, options and policies will all be assessed against these objectives.
SA02	Where sites are recognised for future development - screening etc. should begin long before site working so vegetation etc. used in screening has grown.	Development management issue - will be passed over to the plan team.
SA02	Restoration must be built in to any mineral development and when appropriate phased in with working.	Development management issue - will be passed over to the plan team.
SA03	The approach appears to be sound as it identifies that sustainability principles and their application/interpretation will vary widely between different areas.	Comments noted.
SA03	It is important that sound judgements can be made based on local consideration of environmental, social and economic effects.	The SA will be informed by published literature and professional judgement. In addition, the site assessment methodology that is currently being developed will take account of local circumstances and will feed into the wider sustainability appraisal.
SA04	It is not sustainable to burn waste in the middle of the countryside.	The sustainability of site allocations will be assessed against 17 SA objectives to give a rounded view of the sustainability of different options for waste management.
SA04	Incineration will divert recyclable and re-usable material into the incineration stream.	Comments noted. The sustainability effects of all waste spatial options will be considered.
SA04	Given that the incinerator is in the middle of the	Comments noted. The sustainability

	<p>countryside it will not even have the side benefit of providing district heating.</p>	<p>effects of all waste spatial options will be considered.</p>
SA04	<p>In continental Europe countries like Germany and Holland now recognise that they have over capacity in incineration and NYCC, having failed to develop a coherent plan in built contingencies, are now falling into the same trap despite the Government having told them that their proposed incinerator is excess to requirements.</p>	<p>Although EU targets on waste recovery have been met nationally, there is still a need to move waste management up the waste hierarchy.</p>
SA05	<p>In 'Table 7 - Sustainability Appraisal Framework ' of the Scoping Report we support the proposed objective 2 - 'Enhance or maintain water quality and improve efficiency of water use'.</p>	<p>Comments noted.</p>
SA05	<p>We look forward to seeing further detail on how sub-objective 'Ensure that Water Framework Directive status objectives for surface and groundwater are not compromised by maintaining or improving upon ecological and chemical status' will provide assurances against the issues raised above.</p>	<p>Minerals and waste policies will be assessed on their effects on surface and groundwater, as set out in the SA framework.</p>
SA06	<p>The first focus of the Sustainability Appraisal should be to identify local provision of material wherever possible as the costs (both financial and environmental) of transportation are significant.</p>	<p>Comments noted. All sites, options and policies within the Joint Plan will be assessed against all sustainability objectives outlined within the scoping report. Local provision is supported by the SA objectives.</p>
SA06	<p>In a predominantly rural area covered by the authorities, the biggest contribution would be a network of low carbon public transport with incentive for its usage to ensure that the frequency of service is adequate.</p>	<p>The SA framework supports low carbon public transport, but this will be covered in more detail in local transport plans.</p>
SA07	<p>Yorkshire Water produces a Water Resource Plan every 5 years, this looks forward over a 25 year period and is agreed with the Environment Agency. We are currently consulting on our new plan due to be published in spring 2014. This would be a suitable addition to the PPPSI review table. A summary and link to the full plan can be found here: http://www.yorkshirewater.com/our-environment/water-resources/managing-water-resources.aspx.</p>	<p>Comment noted. The Plan has been added to the PPPSI.</p>
SA07	<p>Table 6 - there are a number of Source Protection Zones (SPZ) as defined by the Environment Agency within North Yorkshire that protect the groundwater from which Yorkshire Water supplies parts of North Yorkshire and the surrounding areas. An SPZ1 is the inner catchment zone in which water at the water table will reach the abstraction point for water supply in 50 days or less; SPZ2 represents a travel time of 400 days for contaminants at the water table reaching the adit. Areas designates as SPZ1 are therefore of particular concern and certain types of land use are</p>	<p>The location of sites within areas of particular environmental sensitivity will be taken account of within the site assessment methodology.</p>

	therefore wholly inappropriate within SPZ 1 and to a lesser extent SPZ2.	
SA07	If development is permitted in SPZ1, Yorkshire Water would expect mitigation measures to be implemented that are appropriate to the particular development.	Development management issue - will be passed over to the plan team.
SA07	SPZ3 are of less concern and very few types of development would be unacceptable, although mitigation may still be required.	Development management issue - will be passed over to the plan team.
SA07	Yorkshire Water will object to any development that it believes poses an unacceptable risk to the public water supply.	Comments noted.
SA07	Foundations or other groundworks must not penetrate the natural drift cover that protects the aquifer.	Development management issue - will be passed over to the plan team.
SA07	Foul drainage should be to foul sewer and in SPZ1, foul drainage proposals should include provision of a suitable lined system for the sewers and an appropriate means of ensuring that associated foul water infrastructure (e.g. a pumping station) is sealed such that there will be no discharge of foul water to ground.	Development management issue - will be passed over to the plan team.
SA07	In SPZ1 Yorkshire Water would generally expect a developer to provide, as part of a planning application, a detailed risk assessment to include a detailed conceptual model of the groundwater regime, including cross sections across the area and which takes into account seasonal variations.	Development management issue - will be passed over to the plan team.
SA07	Consideration of existing, construction and post-construction risks and mitigation should be detailed with some quantitative as well as qualitative assessment.	Development management issue - will be passed over to the plan team.
SA07	Table 7, objective 2 - We would question the legitimacy of the sub-objective 'Prevent unsustainable levels of ground and surface water abstraction' in this context. Yorkshire Water's abstractions, as with all abstractions, are governed and agreed by the Environment Agency and they would be unlikely to grant an abstraction licence if they felt it was unsustainable.	This is reflecting the need to make sure that this is taken account of strategically and from the outset.
SA07	Table 7, objective 6 - Yorkshire Water support the inclusion of sub-objective 'Maximise the generation and use of renewable energy in appropriate locations'. Some processes related to the production of clean water and the treatment of waste water are energy intensive and Yorkshire Water is committed to exploring new ways of meeting that energy demand through renewable sources.	Comments noted.
SA07	Table 7, objective 9 - Yorkshire Water supports the inclusion of the sub-objective 'Recover residual resources', particularly related to anaerobic digestion and similar processes.	Comments noted.
SA07	Table 7, objective 16 - Yorkshire Water would	Promotion of SUDS for future

	suggest the inclusion of a sub-objective specifically linked to the promotion of sustainable methods of drainage in new development and retrofitted to existing development. Surface water flooding should be highlighted as a potential cause of flooding.	development is included in objective 16. There is limited capacity to influence existing development.
SA08	More emphasis on plans to reduce, re-use, recycle and local composting, alongside exploring safe and sustainable new technologies to reach the ideal of zero waste.	We recognise the need to move up the waste hierarchy, which is included in objective 9.
SA09	Incineration is not a sustainable long term solution to waste treatment given the rapid changes already apparent in the waste in treatment industry.	The sustainability of incineration is determined by the waste hierarchy.
SA10	The Sustainability Appraisal should be approached in line with point 4 in question 3 (which is: In regard to minerals extraction an overall view should be taken towards the economic and environmental aspects).	A balance between social, environmental and economic aspects of alternatives will be made.
SA11	Natural England's opinion should be sought on any proposed site from the outset to avoid sites with high environmental value being included in the Joint Plan.	Agreed and comments noted.
SA14	<p>The definition of SD is 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs':</p> <p>This means that the approach and scoping should look for</p> <ul style="list-style-type: none"> • A flexible approach that is able to respond to changes in technology, costs and other priorities. • A low cost approach. • Using existing facilities within and outside the Joint Plan Area. • Minimise environmental impact. • Start with Prevention, Reuse and Recycling. • Work with Joint Plan District Councils. 	Where developments are publically funded, costs are considered alongside the SA in addition to consultation outcomes. Most minerals and waste developments are privately financed. The waste hierarchy is taken into account in the production of the Plan.
SA15	There is a great deal of material in the documents mentioned in this question and it is unreasonable to expect people to respond in detail to this voluminous material on a short timescale. Instead, we set out below what we think needs to be taken into account, starting from first principles. However, it is clear that these documents fail to use the Brundtland definition of sustainability which is both internationally recognised and a crucial part of the National Planning Policy Framework. Sustainable development (SD) is a pattern of resource use that aims to meet human needs while preserving the environment so that these needs can be met not only in the present, but also for generations to come. The Brundtland Commission and UN Resolution 42/187 definition of SD is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs".	The information contained in the Scoping Report is required to meet statutory requirements. The Brundtland definition is used in section 3.1 of the scoping report.
SA15	1. As with Question 3 above, the decision by NYCC	Allerton Park has already been

	to grant planning permission for the AWRP must cloud any discussion of sustainability.	granted planning permission and will therefore not be considered as part of the Joint Plan.
SA15	2. The Brundtland Commission and UN Resolution 42/187 defined Sustainable Development as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The AWRP would not meet this definition. The 25 to 30 year contract will fundamentally compromise the ability of future generations to meet their needs and lead to the destruction of valuable resources that could have been reused or recycled, necessitating the exploitation of virgin resources. The incinerator dominates the facility in cost and treatment volumes and, once built, cannot be reduced in size and its capital-intensive nature forces the operator to run it at full capacity even where there is no need within the county to do so. Its' use would cause harm by emitting substances harmful to man, wildlife or the environment and damage the Council's ability to increase recycling to anywhere even near to best practice.	Allerton Park has already been granted planning permission and will therefore not be considered as part of the Joint Plan.
SA15	3. Accordingly, no strategy for waste management that includes incineration can meet any reasonable sustainability criteria.	Incineration of residual waste where a useful product is recovered (e.g. energy) is considered to be more sustainable than landfill within the EU's Waste Hierarchy (included within the scoping report).
SA15	4. The NPPF states that authorities should conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations. This must apply equally to waste and to minerals extraction. In particular even AmeyCespa has admitted that the proposed AWRP development would cause harm to the landscape that cannot be adequately screened or mitigated. This further demonstrates that the proposed development fails the sustainability test.	Landscape impact is carried out as part of the SA. However, it should be noted that this is one consideration of the SA and there are many other sustainability issues to take into account.
SA15	5. Sustainable development (SD) is a pattern of resource use that aims to meet human needs while preserving the environment so that these needs can be met not only in the present, but also for generations to come (this is something taught as ELF - Environment, Local People, Future).	Comments noted. This is reflected within the SA objectives.
SA15	6. The production of waste represents a failure of sustainability but waste management can overcome this to a certain extent. DEFRA's Government Review of Waste Policy in England 2011 (WR) was published in June 2011 along with a series of supporting documents. It contains actions and commitments for	The Plan can promote reductions in the volumes of waste produced, but it must also acknowledge that there must be a method in place to deal with any residual waste that arises. The SA Framework seeks to

	<p>government and other key players. Together, these seek to set a direction towards a ‘zero waste economy’ – defined as one where “material resources are re-used, recycled or recovered wherever possible, and only disposed of as the option of very last resort” (WR para 28). The Government envisages that amongst others, in a zero waste economy resources will be fully valued, financially and environmentally. This sees one person’s waste as another’s resource so that over time we get as close as possible to zero landfill and a new public consciousness in our attitude to waste.</p>	<p>promote management of waste as high up the waste hierarchy as practicable.</p>
SA15	<p>7. The Waste Hierarchy reflects sustainability issues. Thus a key to judging whether a strategy even approximates to such a vision (essentially a vision of sustainable waste management) is the extent to which a given strategy complies with the Waste Hierarchy. This has to be interpreted with care, something that the consultation documents fail to do.</p>	<p>This is taken into account within objective 9.</p>
SA15	<p>8. The Waste Hierarchy is set out in Article 4 of the revised EU Waste Framework Directive (Directive 2008/98/EC) - see DEFRA and EA. It comprises five steps for dealing with waste, ranked according to environmental impact – the ‘waste hierarchy’ (illustrated in Table 1 and Figure 1). Prevention, which offers the best outcomes for the environment, is at the top of the priority order, followed by preparing for re-use, recycling, other recovery and disposal, in descending order of environmental preference, as illustrated in the table below. However, there is considerable difference between the environmental impact of the various technologies under “other recovery”, both in terms of the climate change and other emissions.</p>	<p>The waste hierarchy is taken into account within objective 9. Other objectives (e.g. on climate change) should help differentiate between more or less sustainable options that operate at the same level on the waste hierarchy.</p>
SA15	<p>9. As the Scottish Environmental Protection Agency, SEPA say “The Directive shifts the focus away from waste as an unwanted burden towards being a valued resource, which can provide opportunities for sustainable growth in a low carbon economy”.</p>	<p>This is taken into account within objective 9.</p>
SA15	<p>10. The waste hierarchy has been transposed into UK law through the Waste (England and Wales) Regulations 2011. The Regulations came into force on 29 March 2011. The provisions relating to the hierarchy (set out at in Regulations 12, 15 and 35) came into force on 28 September 2011.</p>	<p>This is taken into account within objective 9.</p>
SA15	<p>11. The further up the hierarchy, the greater the contribution that is made to sustainability. Disposal is not a sustainable option. [Included diagram and description of the waste hierarchy.]</p>	<p>This is taken into account within objective 9.</p>
SA15	<p>12. The picture with AWRP is, of course, complex and illustrates the need for a careful approach when comparing waste management strategies. For</p>	<p>Allerton Park has already been granted planning permission. Objective 9 will assess the</p>

	<p>example, AWRP’s AD plant with its electricity generation can properly be classified as “other recovery”. However, the EfW (incinerator) plant is electricity generation only rather than CHP and is therefore at the lowest level of “other recovery”, only just above disposal at the bottom of the waste hierarchy.</p>	<p>sustainability of options for future waste developments in the Issues and Options document.</p>
SA15	<p>13. To illustrate the care needed in looking at the sustainability of different waste management strategies, one must consider the Waste Framework Directive (Directive 2008/98/EC) which set new standards in the waste management field, including ambitious recycling targets all over the EU and a requirement to develop national waste prevention programs. It also clarified the “recovery” and “disposal” definitions. According to the new waste hierarchy, incineration can be qualified as a recovery operation rather than a disposal one, when the energy recovery efficiency is higher than a designated threshold. The threshold for MSW incineration facilities to be classified is that the energy recovery efficiency calculated according to the “R1 formula” . According to Grosso et al. [reference included in comments form], about 40% of European incinerators do not meet the 0.6 threshold for plant existing before end 2008 and are thus classified as “disposal”. In general the “disposal” plants produce only electricity or, when CHP, they treat less than 200,000 t/y. Thus EfW (incinerator) facilities that do not supply CHP may not meet the criterion for being regarded as a recovery facility.</p>	<p>Comments noted. This will be assessed as part of the SA under objective 9. Further detail on different types of waste management is contained in the Topic Papers which provide evidence to inform the Plan. These are available at www.northyorks.gov.uk/mwevidence</p>
SA15	<p>14. According to Art 4(2) of the WFD, Member States should encourage those waste management options that deliver the best overall environmental outcome. For waste streams where recycling is the preferable option, this should include appropriate measures such as introduction of separate collection schemes and other measures supporting recycling, implementing recycling targets and avoiding overcapacities for waste incinerators in waste management plans [references guidelines in Waste Framework Directive].</p>	<p>The WFD and its objectives are taken into account within the SA framework. Different Plan options will be assessed based on their likely potential impacts on water bodies.</p>
SA15	<p>15. Chapter 7 of the UK Government Sustainable Development Strategy (Cm 6467) states that “The overall objective of government policy on waste is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Through more sustainable waste management – reduction, re-use, recycling, composting and using waste as a source of energy – the Government aims to break the link between economic growth and the environmental impact of waste.”</p>	<p>This will be taken into account under sustainability objective 9.</p>

SA15	<p>16. Achieving the Coalition’s ambition of “working towards a zero waste economy, encouraging paying people to recycle and working to reduce littering” as set out by DEFRA’s Secretary of State [includes reference of speech to SoS] means action at all stages of the waste hierarchy to achieve optimal waste management which reduces waste, ensures maximum re-use and recycling and deals with the residual wastes in an environmentally responsible manner that takes full and proper account of health risks. In addition, DEFRA will be working with the Department of Energy and Climate Change (DECC) “to send a much greater volume of our biodegradable waste through anaerobic digestion – generating renewable energy and bringing down levels of greenhouse gases from landfill”. A natural extension of this would be to avoid waste management options that are unusually bad for climate change.</p>	<p>This will be taken into account under sustainability objectives 6 & 9.</p>
SA15	<p>17. The clear implication is that any acceptable waste management strategy can and must comply with the waste hierarchy. Crucially, this means treating each item of waste as far up the waste hierarchy as possible. It is not acceptable for waste that could be recycled to enter the “other recovery” tier. Within “other recovery” waste should be treated as far up the hierarchy of technologies in that tier as is possible.</p>	<p>This will be taken into account under sustainability objective 9.</p>
SA15	<p>18. An obvious corollary of the Brundtland definition (as used in the NPPF) is that the waste management system should not produce hazardous waste where none existed within the waste feedstock, Examples of such unacceptable production of hazardous waste are fly ash and air pollution control residues from incineration. This is not acceptable within a sustainable waste management system since there are cleaner and more environmentally friendly alternatives that do not produce hazardous waste streams as a result of their operation.</p>	<p>This will be taken into account under sustainability objectives numbers 4 &15.</p>
SA15	<p>19. It is essential to compare different waste management strategies on the basis of sustainability, taking a holistic view of the entire system. This will take strong account of the waste hierarchy and any system that does not comply with it cannot be regarded as a sustainable development and should therefore be ruled out. It will include comparison of the extent to which different systems treat waste as far up the waste hierarchy as possible, for example a system such as that in San Francisco in which over 70% of residual waste is recycled would be greatly superior in terms on sustainability than the proposed NYCC/CYC system at AWRP.</p>	<p>Allerton Park has already been granted planning permission. Objective 9 will assess the sustainability of different waste disposal options.</p>
SA15	<p>20. However, compliance with the waste hierarchy is not the entire story since sustainability also means minimising harm to the environment and human</p>	<p>The consultation outcome and the SA will both inform the final Plan.</p>

	health. The latter means accepting that some technologies cause fear and resentment among sections of the population and that this is a form of harm and therefore a counter-indicator to using that technology.	
SA15	21. Selecting an optimum strategy further means compliance with the proximity principle and seeking to minimise transport impacts, in particular road traffic.	This is taken into account within objective 3.
SA15	22. Selecting an optimal strategy, particularly one that is future-proof and will not tie the people of the area to a particular choice for a generation is not an easy task. The waste hierarchy coupled with considerations such as financial flexibility, effect on employment in the wider economy in the area (particularly on important industries locally such as agriculture, leisure and tourism), and minimising adverse impacts on human health and the environment all need to be taken into account.	The sustainability objectives taken together cover this range of effects.
SA15	23. A choice has to be made between all available technology choices and different geographical patterns of waste facilities. It is no good selecting an expensive and obsolescent technology which limits choice for a generation simply because planning permission has been granted. The need now is for an honest choice of waste management systems to be made untrammelled by the errors of the past.	Planning permission for Allerton park has been granted . The Joint Plan considers minerals and waste planning into the future. The plan production process must begin from the start to meet legislative requirements as it covers a new area.
SA15	24. Assessing sustainability fairly and honestly means challenging existing pre-conceptions and assumptions. Unlike the proposed appraisal, it also means paying full regard to cost, economics and affordability. Given that most respected economists see much of the plan period, especially the first part, as one of low growth, escalating cost and shortage of funds, the effects of excessively expensive or inflexible waste plans on other council services and the people employed in them and who use them must be taken into account. The plan cannot be formulated in isolation.	Most elements of sites that come forward for development will be privately funded commercial projects.
SA15	25. A good starting point is the recommendations arising from the Waste Core Strategy stakeholders workshop at Northallerton on 18 October 2011 which showed a strong emphasis to sustainability, using waste as a resource, moving waste treatment up the waste hierarchy, treating waste close to the source (proximity principle), having distributed treatment centres rather than a single massive site, minimising distances waste is transported, supporting local economies with small local treatment centres, using treatment options outside the county boundary, minimising carbon footprint.	The SA builds upon recommendations made in previous SA related consultations The impact of waste development will be assessed under objective 9.
SA15	26. Failure to take these points on board would suggest that you did not like the answers from the	Planning permission for Allerton park has been granted and cannot

	previous consultation exercise and have abandoned the earlier consultation in the hope of achieving a new consultation which validates the NYCC decision to enter into a contract with AmeyCespa for the AWRP.	therefore be reconsidered through this Plan. The Joint Plan considers minerals and waste planning into the future. The SA builds upon recommendations made in previous SA related consultations.
SA16	The sustainability Appraisal should approach the issue of impact of sites for minerals and waste on the environment.	The sustainability objectives take all relevant environmental effects into account.
SA17	The definition of sustainable development may be too narrow if it is allowed to be interpreted as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Some minerals are clearly running out. We should be looking for alternatives which are less damaging to the climate, the environment, and to human and animal life.	Sustainability objective number 8 covers this issue.
SA17	The draft sustainability objectives, however, are laudable, and should not be diminished.	Comments noted.
SA17	There should be some assessment of the dangers of hydraulic fracturing to release hydrocarbons, considering the international literature of effects on water pollution and health.	The sustainability objectives are designed to assess the effects of all types of minerals and waste development. All assessments will be evidence based, drawing on published studies and professional judgement.
SA17	There should be an assessment of the desirability and lower cost of a zero waste strategy compared to the expense of either incineration or landfill.	The Joint Plan must account for residual waste produced across the Plan Area in the future. Reduction in waste is largely beyond the scope if this Plan.
SA18	The joint plan is an opportunity to aim for enhancement of environments rather than simply sustainability through appropriately directed coordination and management of environmental issues.	This may be carried out through restoration plans and is considered under objective 1.
SA19	The joint plan is an opportunity to aim for enhancement of environments rather than simply sustainability through appropriately directed coordination and management of environmental issues.	This is taken into account under sustainability objective 1.
SA24	Only that I think lots of residents of NY are keen to do their bit and engaging the public in adopting sustainable practices should be a priority – at least making it easy for people to recycle as much as possible with minimum effort.	Comments noted.
SA25	How to make those positive contributions to wider objectives such as those mentioned, but also conservation and renewable energy.	These issues are covered under the sub-objectives.
SA25	Plastics are a notable component of landfill or incineration that should be given more attention for recycling. Most recyclable containers identify the	This is considered as part of sustainability objective 9, and objective 17 which supports

	plastic by code, and more attention could be given to local sorting close to source, e.g. by volunteer groups.	'community led waste management schemes'.
SA25	The carbon cost of disposal of household waste at waste transfer stations needs to be considered. This is particularly galling in relation to local authority boundaries. If I wish to use a trailer to move waste to a transfer station, I cannot go to the nearest because it is in the York district, but have to more than twice as far, to Malton. Border issues should not exist for households.	Carbon emissions are taken into account under sustainability objective number 6. The issue raised relating to use of particular facilities is beyond the scope of this Plan.
SA25	Local recycling of biomass and waste timber card and paper should be encouraged, including companies that convert such materials into energy products, such as wood pellets. Such considerations should be part of the planning framework in relation to housing and business developments. Why exclude small businesses from waste recycling by not including them in household collection cycles?	This is taken into account under sustainability objective number 9. The issue raised relating to collections is beyond the scope of this Plan.
SA26	SA objectives: Number 2 - add in word 'supply' to read 'Enhance or maintain water quality and supply...'; Number 3 - add in word 'impact' to read 'Reduce transport impact and reduce...'; Number 5 - add in word 'environmental to read 'Use soil and land efficiently and safeguard or enhance environmental quality'; Number 6 - add in 'low carbon economy' to read 'Reduce the causes of climate change and move to a low carbon economy'.	It is felt that the additional wording to objective 5 is not necessary as other objectives seek to safeguard environmental quality. Similarly, a low carbon economy is supported by objective 12. Objective 2 - While water supply is not explicitly referred to, it is felt that 'efficiency of water use', referred to in the objective, will protect supply. However, the point does highlight that supply of water could be better protected - for instance by protecting groundwater source protection zones, which may be disrupted by inappropriate development. Therefore an additional sub objective 'protect groundwater source protection zones' should be added. Objective 3 - impact is covered under objective 15.
SA27	As set out in the leaflet: economic, social and environmental priorities - to be set after consultation with local communities, businesses and residents, etc.	Comments noted. There will be three further rounds of consultation on the plan (Issues and Options, Preferred Options and Publication) and a Sustainability Report will be produced at each stage.
Natural England	In general Natural England welcomes the approach to evaluating the robustness of the SA objectives and considers the matrix in figure 5 to be very useful in highlighting areas of incompatibility and uncertainty. It is extremely important that the areas of incompatibility and uncertainty are resolved as much as possible;	Comments noted. The compatibility matrix has been reviewed as part of the finalised Scoping Report and further explanation added that where uncertainties exist it is possible for these to be consistent.

	otherwise it is likely that incompatibility/uncertainty will continue forward to the next draft of the SA. Rewording/amendment to objective/sub objective wording and any associated objective explanation can help to minimise conflict and uncertainty.	
Natural England	With respect to the SA objective on soil, 'Use soil and land efficiently and safeguard or enhance their quality', Natural England considers that more detail should be added to ensure reclamation is adequately considered when appraising the effects of the Joint Plan. The plan should seek to require high standards of reclamation to appropriate after-uses that are demonstrated to be technically achievable, financially viable and sustainable in the longer-term (i.e. well beyond the completion of the statutory aftercare period).	The Plan will set out policies relating to reclamation and restoration of sites. The sub-objectives are sufficient to assess whether restoration policies will contribute to the SA objective. Restoration itself isn't a sustainability objective - though the existing sub objective 'promote good land management practices on restored land' should encompass the points made.
Natural England	Natural England would also expect the Habitat Regulations Assessment (HRA) to inform the SA and its objectives. Whilst SEA and HRA are two separate processes and should be reported upon separately there are a number of linkages between the two processes. For example, evidence gathered for the HRA on European Sites can be fed into the SA process. The HRA of The Joint Plan does not appear to have commenced and therefore should be started as soon as possible to ensure any evidence can be fed into the SA process.	Work has recently commenced on the Habitats Regulations Assessment for the Joint Plan and efforts will be made to share evidence base information between the SA and HRA while keeping the two processes separate.
SA29	My comments from the workshop in York will be relevant. Unfortunately I don't have enough time to look through the document in sufficient detail to provide helpful comments.	Comments noted. Unfortunately it is not possible to disaggregate and ascribe comments made during the workshops to individuals due to the open discussion format of the workshops. However all comments were recorded and will be taken into account.
SA29	I will attach with this response a copy of a document drawn up in 2009 as part of a project to map BAP habitat opportunities and mineral sites done by YWT in partnership with NYCC. [Named Individual - the Principal Ecologist at North Yorkshire County Council] will have a copy of the report.	Comments noted. The report will be considered during the literature review preceding relevant assessment/appraisal work
Environment Agency	Flood Risk: We are satisfied with the approach taken, and we are pleased to see, and we support, the planned production of a specific Waste & Minerals Strategic Flood Risk Assessment to inform your decision making process.	Comments noted.
Environment Agency	Groundwater: We are pleased to see that the following documents are listed in your table of relevant plans: EU Water Framework Directive (2000), EU Directive on the Protection of Groundwater (2006); EU Nitrates Directive (1991); Groundwater Protection: Policy & Practice	Comments noted. The Humber River Basin management Plan is referred to within the PPPSIs.

	(Environment Agency, 2012); Regional River Basin Management Plans (Environment Agency, 2009) N.B you need to specifically refer to the Humber river Basin Management Plan.	
Environment Agency	Biodiversity: We are pleased to see that the objective of 'enhancing biodiversity' is included within the SA. Table 7 of the SA Scoping Report highlights well the key factors that should be considered through the production of the SA and the plan itself.	Comments noted.
Environment Agency	General: Sustainability Appraisal Scoping - Appendix 1 – suggested amendments: 3. Reduce transport miles and associated emissions from transport and encourage the use of sustainable modes of transportation. Add as sub objective: encourage beneficial use of waste near to site of production or treatment. Reason: excessive transport costs can make reuse/recovery of waste uneconomic.	The sub objectives already include 'Encourage proximity between minerals and waste sites and sources'. However, it is accepted that it may be unclear as to what the scope of this sub objective is. Therefore, an explanatory footnote will be added to clarify the sub objective, and in particular the beneficial uses to which both traditional and non-traditional end products of waste processing can be put when users exist nearby.
Environment Agency	4. Protect and improve air quality. Add as sub objective: consider potential for odour effects on existing communities. Reason: Unpleasant odours from waste facilities are one of the most common causes for public complaint, and have a detrimental effect on amenity.	The existing sub objective 'to minimise dust and odour' would cover the point made. However, it does not identify specific receptors to odour, which may result in variance in significance. Reword the sub objective to 'to minimise dust and odour, particularly where communities or other receptor may be affected'.
Environment Agency	5. Use soil and land efficiently and safeguard or enhance their quality. Add as sub objective: Ensure when biodegradable waste is spread to land it has a beneficial effect. Reason: Spreading inappropriate wastes to land can cause damage to soil and water.	This is too detailed an action to be included as a sub-objective and for assessing policies of the Joint Plan and is covered more broadly by 'promote good land management practices on restored land'
Environment Agency	8. Minimise the use of resources and encourage their re-use and safeguarding. Add as sub objective: Encourage sustainable construction techniques so as to reduce resource use in all building. Because: These principles can be applied to all construction.	The sub objective will be added as 'Encourage the utilisation of sustainable construction techniques'.
Environment Agency	9. Minimise waste generation and prioritise management of waste as high up the waste hierarchy as practicable. Add as sub objective: Ensure all infrastructure is designed and built so as to maximise opportunities for segregation and collection of recyclables, e.g. Adequate space for bin storage, home composting etc. Because: Ease of collection makes recycling more cost effective.	This suggestion is a policy rather than a sustainability objective or sub-objective.
Environment	12. Achieve sustainable economic growth and create	Comments noted.

Agency	and support jobs. Comments: We welcome the statement on capturing value from waste streams.	
Environment Agency	15. Protect and improve the wellbeing, health and safety of local communities. Suggestions: Could this be widened to include all potential detrimental impacts on amenity and wellbeing. There is no specific mention of the potential for odour which we have found to be an important factor in whether a waste facility is acceptable to its near neighbours.	Odour is already mentioned under SA objective 4 - however we accept that it can have impacts on quality of life, so we will include odour as an example of a nuisance impact in the first sub objective, i.e.: 'To minimise the impact of nuisances associated with minerals and waste development, such as noise pollution, odour and severance'.
SA32	We welcome the approach taken and the underpinning of the plan by the definition of sustainable development and the guiding principles of the UK Sustainable Development Strategy.	Comments noted.
SA33	Unfortunately the scope of the sustainability appraisal does not include the nature, needs, potential and sub-regional/national roles and functions of waste processing sites such as that operated by Dalkia plc. .In this aspect the appraisal could be considered to be significantly deficient.	Comments noted. It is not for the sustainability appraisal of this plan to favour any one particular waste management technology (or set of technologies) over any others. Rather its role is to appraise the overall approach to planning for waste management in the plan area. The Material Assets section of the baseline of the scoping report considers broad details of waste managed within the plan area and the SA Framework promotes waste as a potential resource through, for example, the SA Sub objective 'recover residual resources (e.g. through anaerobic digestion or energy recovery)'. However, the point made suggests that there may be merit in including some broad information on the potential of all waste types (not any particular individual waste types) as a resource for a range of usable products, accepting that data may be limited, as well as some discussion on likely sources of wastes for processing to usable produces. Further consideration of the sustainability of waste processing at a sub-regional / regional level should also be considered during the assessment..
SA33	It is considered critical for the soundness of the plan that the waste sites and areas assessment methodology (to be developed) includes	Comments noted. The site assessment methodology will include assessment of the viability

	consideration of the importance of maintaining the economic viability and sub-regional/national function of sites such as that operated by Dalkia.	of sites with the aim of aiding the allocation of only viable sites.
SA35	i. The sustainability appraisal must include quantification of financial matters. At present affordability is barely mentioned.	This isn't relevant to the appraisal as most development will be commercially financed.
SA35	ii. The document fails to recognise the comments submitted by us and others to the most recent consultation on the Waste Core Strategy. This gives no confidence that any of the comments submitted to this round will be given any weight at all. You have a serious issue in terms of public trust and engagement, precisely because so many views that have been legitimately expressed in the past have been ignored.	Responses to previous consultations carried out by NYCC on the Core Strategies have been considered in drawing up the Issues and Options document. The SA scoping report as presented has been informed by the sustainability appraisal work that has preceded it in all three partner planning authorities. While it is hoped that the core elements of those SA documents are retained (and appendix IV of the Scoping report shows the headline SA objectives arrived at through consultation in previous consultation rounds which were reviewed ahead of this work), inevitably a changed plan scope and geographical area will lead to adjustments in the approach taken to this new sustainability appraisal. Section 5 of this report summarises earlier recent consultation activity.
SA36	I broadly support the draft Sustainability Appraisal objectives but believe more rigour should be applied to reducing climate changing gases. Britain needs to do better on greenhouse gas reduction and local authorities need to play their part by adopting an appropriate greenhouse gas reduction target. A major climate summit will take place in 2 years' time in Paris.	Comments noted. This is taken into account under sustainability objective 6.
SA37	One overall objective should be to assess how both the minerals and waste frameworks contribute to resource efficiency improvements and the circular economy. Should be stronger than current objective 8.	Add to sub-objective under objective 9? (Economic gain through re-use?)
SA37	Options for local job creations via CICs [CICs is not defined, but is taken to mean Community Interests Companies] and charities getting involved in materials / items sorting, repair and re-use. Also reducing waste transport need.	Agree. CICs and charities can play an important role in waste management and are already supported by the sub objective to 17 'to support community led waste management schemes'. The existing SA framework contains sub objectives that seek to reduce the need for transport.
SA37	Objective 5 on soil quality should encompass	This is too detailed an objective to

	improving the water and carbon retention of soils (to prevent flooding and sequester carbon to prevent CO2 reaching the atmosphere) and reducing topsoil lost to wind and water erosion by ensuring particles are heavier so less easy to blow away	be specified within the SA - we cover broad objectives and sub-objectives here and have to include only measurable indicators through which success of the Plan is measured. It should be noted that the sub objective 'conserve and enhance soil resources and quality' would cover this in a broader sense.
SA37	Any waste solution should be as close as possible to the producers of that waste, so they can see the results of their irresponsibility, so they can get to materials re-use / repair sites easily and by sustainable means, and so sites are close to people to use the resulting repaired items.	For this issue, the Proximity Principle in PPS10 is used, along with consultations carried out as part of the Plan and the accompanying SA.
SA38	Decisions should take into account the impact on the landscape character based on the latest landscape character assessments, including the North Yorkshire & York Landscape Character Assessment 2011 and Reading the Past in Today's Landscape: North Yorkshire, York and Lower Tees Valley Historic Landscape Characterisation (HLC). Great care should be taken to ensure the landscape assets (identified within the LVIA) are conserved in a manner appropriate to their significance, including the impact of proposals on any views that are important to the area.	Landscape Character Assessment will inform the site assessment methodology. 'Reading the Past in Today's Landscape: North Yorkshire, York and Lower Tees Valley Historic Landscape Characterisation (HLC)' will be added to the PPPs
SA39	Care must be taken to fully acknowledge that mineral development can only take place in areas where the mineral quality and resource scale are of sufficient scale to merit development. For new workings a resource of over 1.5 million tonnes is generally required to justify the capital costs of the planning process and site development costs. In relation to Home Farm Kirkby Fleetham we have a draft EIA and we would appreciate detailed discussion when you are undertaking sustainability appraisal.	Comments noted.
SA40	Clearly, the Sustainability Appraisal, relating to waste treatment must stress the question of greenhouse gas emissions as one of the key elements in relation to all forms of waste handling and treatment.	Sustainability objective 6 takes this into account.
SA41	The 17 points at the beginning of the report seem comprehensive	Comments noted.
SA41	In the ideal world humanity should be aiming for a Zero foot-print asap.	Sustainability objective 6 takes this into account.
SA42	I cannot fault the sustainability appraisal itself. However, there is a need to guarantee that nothing recommended in or allowed by the Minerals and Waste Joint contravenes it	The SA will inform the final Plan.
SA43	The appraisal needs to take into account: 1. Environmental Sustainability; 2. The impact on the local environment; 3. The impact on the surrounding	To draft response once actions carried out.

	economy; 4. The impact on the population; 5. The impact on tourism and rural industries	
SA44	The volume of information contained with the Sustainability Appraisal Scoping Report and associated Appendices makes it very difficult for the non-expert to comment.	Comments noted. A non-technical summary is provided as part of this Sustainability Appraisal. A separate Non-Technical Summary will also be produced to accompany the Sustainability Appraisal Update Reports at key stages.
SA44	The Parish Council refers in brief to the key messages table on page 25: "Protect and enhance historic and archaeological features" - Allerton Castle (of significant historic interest) will not be enhanced by the development of the AWRP.	Comments noted. AWRP already has planning permission so will not be assessed by the SA.
SA44	"Conserve and improve local environmental quality ..": Issues of significant air pollution already existing in Knaresborough – an AQMA with emissions exceeding acceptable limits (primarily caused by HGV movements);	Comments noted. AQMAs (including the one in Knaresborough) are recorded in the baseline.
SA44	"Ensure development proposals do not result in unacceptable air, water or land pollution": Incineration will produce toxic substances including incinerator bottom ash and air pollutants.	Comments noted. Such issues are already covered by the SA Framework, so should be taken into account where relevant to specific options or sites.
SA44	"Seek to safeguard and improve the health and wellbeing of communities ...": See above. Additional to the actual impact on health will be the mental anguish in regards to the impact on health.	Comments noted. While the wellbeing sub objective should capture these issues, it is felt that some additional analysis of mental health issues in the plan area would enhance the baseline.
SA44	"Recognise the importance of protecting the best and most versatile agricultural land and fertile soils"; AWRP would be surrounded by prime farming land, sustaining crops and animals. Pollutants would quickly enter the food chain.	Comments noted. This is covered by the sub objective 'conserve and enhance soil resources and quality'. AWRP already has planning permission and so will not be assessed by the SA.
SA44	"Ensure that waste is managed as high up the waste hierarchy as practicable": Incineration is at the very bottom of the waste hierarchy. It is a process which creates new hazardous waste.	Comments noted. Moving waste up the waste hierarchy is included in the SA Framework.
SA44	Table 7: Sustainability Appraisal Framework: 3. Reduce transport miles and associated emissions from transport i) reduce vehicle emissions due to mineral and waste movements ii) encourage proximity between minerals and waste sites and markets/sources - The Parish Council would question how creating a single waste treatment plant for the county sits with these objectives.	Comments noted. The SA and Site Assessment Methodology should pick this issue up for future planned sites.
SA46	Please see responses to other questions. [the full response includes answers to all questions - see column K]	Comments noted.
SA46	We support the objectives, however we feel that a	Some of the objectives will conflict,

	number of these could be seen to be in conflict with each other, perhaps these will become clearer as the consultation process progresses	and the extent to which will become clear as the Sustainability Appraisal is taken forward. Uncertainty between competing objectives and their compatibility is also shown in the Scoping Report.
Question 5 from the Regulation 18 Response Questionnaire: Do you have any other comments?		
SA06	If there is a need to identify all potential mineral extraction areas by type, tonnage, technique and duration for the period 2014-2030 then the specific details required by the form will be too difficult to assess in some cases.	Sites put forward will provide this information.
SA06	If there is still the opportunity to bring forward new proposals in that period then as economics, technologies and exploration techniques for minerals evolve, new prospects will inevitably be identified.	The plan will need to be flexible - this will be passed to the plan team.
SA11	Quarry site submitting plans to extend their existing sites should only be able to do so if they can provide evidence that they will have exhausted their mineral/aggregate deposits during this the time frame for which the current call for sites falls (i.e. 2030).	A certain level of mineral reserves will need to be maintained.
SA11	Needless expansion scars the landscape.	Comments noted.
SA11	They should also be tasked with restoring their worked areas before being permitted to expand.	Development management issue - will be passed to planning team.
SA11	Restoring the landscape to its original condition should be one of the priorities.	A range of restoration options will be considered.
SA14	The Allerton Waste Recovery Park should NOT influence the context of the Joint Plan because:	See below.
SA14	<p>1. It is unsustainable and fails objectives 3, 4, 6, 7, 8, 9, 11, 13, 15, 17 of the sustainability objectives below. It also has a 25 year contract life making it wholly inflexible to any change be it political, tax, health or any other criteria.</p> <p>The draft Sustainability Appraisal objectives to be used when assessing the Minerals and Waste Joint Plan are listed, below:</p> <ol style="list-style-type: none"> 1. Protect and enhance biodiversity and geodiversity and improve habitat connectivity. 2. Enhance or maintain water quality and improve efficiency of water use. 3. Reduce transport miles and associated emissions from transport and encourage the use of sustainable modes of transportation. 4. Protect and improve air quality. 5. Use soil and land efficiently and safeguard or enhance their quality. 6. Reduce the causes of climate change. 7. Respond and adapt to the effects of climate change. 8. Minimise the use of resources and encourage their re-use and safeguarding. 	Allerton Park has already been given planning permission and will therefore not be assessed through this SA.

	<p>9. Minimise waste generation and prioritise management of waste as high up the waste hierarchy as practicable.</p> <p>10. Conserve or enhance the historic environment and its setting, cultural heritage and character.</p> <p>11. Protect and enhance the quality and character of landscapes and townscapes.</p> <p>12. Achieve sustainable economic growth and create and support jobs.</p> <p>13. Maintain and enhance the viability and vitality of local communities.</p> <p>14. Provide opportunities to enable recreation, leisure and learning.</p> <p>15. Protect and improve the wellbeing, health and safety of local communities.</p> <p>16. Minimise flood risk and reduce the impact of flooding.</p> <p>17. Address the needs of a changing population in a sustainable and inclusive</p>	
SA14	<p>2. It does not include resources for waste disposal beyond the boundaries of the joint plan area as required by the National Planning Policy Framework.</p> <p>“The National Planning Policy Framework provides that Local Plans should plan positively for the infrastructure required in the area to meet the objectives, principles and policies of the NPPF and that local planning authorities should work with other authorities and providers to:</p> <ul style="list-style-type: none"> - assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and - take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.” 	<p>The NPPF requires cooperation between authorities. However, the NPPF does not state that this means facilities for use by North Yorkshire may be placed in other authority areas.</p>
SA14	<p>3. It is uneconomic because it is too large and relies on incorrect assumptions about waste volumes and does not take into account likely demand for waste from UK and Europe.</p>	<p>Waste projections are currently being undertaken to provide details of waste arisings in the future.</p>
SA14	<p>4. There was no proper consultation despite years of opportunity.</p> <p>In September 2008 Planning inspector Jonathan King held a public examination of the council's waste core strategy. He required clear evidence that the plan being proposed was well researched and thought out. There was no such evidence and NYCC had to seek permission to withdraw its Strategy. NYCC did not draft a new policy but continued with a procurement</p>	<p>Allerton Park has already been granted planning permission. This Plan will address all impacts of minerals and waste planning into the future.</p>

	<p>process for waste disposal. In December 2010 NYCC voted to enter a contract with AmeyCespa. It was only AFTER this decision that NYCC looked to develop a Waste Core Strategy.</p> <p>The consultation papers went out in July 2011 and said that the Strategy MUST pass three tests. It must be</p> <ul style="list-style-type: none"> • Justified when considered against reasonable alternatives • Must be Effective and FLEXIBLE and • Must be Consistent with national policy <p>It goes on to say "...involvement of the public and organisations in the preparation of Waste Core Strategy documents is a FUNDAMENTAL REQUIREMENT of LEGISLATION and GUIDANCE." On page 25, however, one found that the whole strategy was based around an incinerator at Allerton. Page 25 made a mockery of the 'must have' criteria and public consultation requirements stated above. A key stakeholder workshop was held by NYCC in Northallerton on 18 October 2011. It was attended by 25 people, representing Parish Councils, local interest groups, countryside and environment organisations, local authorities and the waste industry.</p> <p>Five key themes emerged prominently.</p> <ol style="list-style-type: none"> 1 Location—the benefits of treating waste as close to source as possible 2 Economic benefit –jobs can be created and maintained through the local management and treatment of waste 3 Cross boundary cooperation 4 Encourage education and behaviour change 5 Sensitivity to landscape—to protect North Yorkshire’s heritage of quality landscape, <p>It is clear that from the progress on consultation made so far that a single site large incinerator is not a desired solution. We are dismayed that the same thing seems to be happening again with the current consultation and inclusion of Allerton on page 5 of the leaflet.</p> <p>ALTERNATIVE The decision of DEFRA not to award PFI credits is an opportunity for NYCC to abandon the Allerton Incinerator with a reasonable excuse. The savings will far outweigh the penalties. More cash will be available for services in the county.</p>	
SA24	I don't want to see our precious landscape and environment destroyed for profit unless there is NO	The landscape is considered under sustainability objective 11.

	other source of specific minerals.	
SA24	I want to see a robust rejection of 'fracking' in North Yorkshire not least because of the underground cave systems much valued by cavers (both local and visitors) who contribute to the county's economy.	Sustainability objective 12 covers economic issues. Any fracking options or policies would be considered by this and the wider SA Framework.
Additional Comments		
English Heritage	The suggested sustainability appraisal objective for the historic environment is somewhat repetitive and it might be better to simply use the following: 'Conserve and enhance the historic environment, heritage assets and their settings'.	Noted, this has now been changed.
English Heritage	Proposed sub-objectives: A key part of waste minimisation in terms of construction and demolition waste is to encourage the reuse or adaptation of existing buildings. This should be included as one of the sub-objectives, perhaps along the following lines, 'Encourage the reuse or adaptation of existing buildings'.	This is generally covered by the objectives, but will also be passed to the plan team.
English Heritage	Draft indicators: Add the following indicator, 'Number of existing buildings adapted or reused'.	Number of buildings reused for waste purposes will be very low, this is more of a LDF/LP indicator.
English Heritage	Proposed sustainability indicator: The suggested sustainability appraisal objective for the historic environment is somewhat repetitive and it might be better to simply use the following, 'Conserve and enhance the historic environment, heritage assets and their settings'.	Noted, will be changed.
English Heritage	Proposed sub-objectives: It is not clear what a 'landmark monument' might be. Consequently it is suggested that this is deleted to avoid any confusion.	Noted, this will be removed.
English Heritage	The York local plan sustainability appraisal includes as specific sustainability appraisal objective relating to the protection of those elements which contribute to the special character and setting of the historic city. In view of the importance of York, consideration should be given to a similar objective, perhaps along the following lines, 'Safeguard those elements which contribute to the special historic character and setting of York'.	A sub-objective to protect the setting of York will be added to this objective.
English Heritage	Draft indicators: None of the indicators will actually monitor the impact which the policies and proposals of the plan are having upon the historic environment. It is suggested that the following additional indicator is added, 'Number of designated heritage assets whose significance is affected either positively or negatively by minerals or waste developments'.	The site assessment methodology, which will assess the sustainability implications of all sites allocated as part of the Joint Minerals and Waste Plan, will document the number of designated heritage sites that are affected by minerals and waste development.
English Heritage	If an additional sub-objective relating to York is included, then the following indicator should also be included, 'Number of minerals or waste developments impacting upon the elements identified as contributing	Reference to York will be included within the first sub-objective of objective number 10. The impacts on historic assets of York should be

	to the special character or setting of York'.	considered in line with historic assets across the rest of the Plan Area.
English Heritage	The number of visits to historic sites provides little information about the impact of this DPD. Therefore, it might be better to delete it.	This indicator can also provide information about tourism in the Plan area, so will be included for these purposes. Indicators for monitoring the effects of the Plan will be established later in the SA process.
English Heritage	One of the main ways by which this plan can assist in protecting and enhancing the character of the townscapes is by ensuring a steady supply of locally sourced building stone. This should be referred to within this sustainability appraisal objective, perhaps along the following lines: proposed sub-objective - 'To ensure a steady supply of building and roofing stone for the repair and construction of buildings and structures'; draft indicator - 'Quantity of building and roof stone extracted'.	Comments noted - the sub-objective will be added. At present there is no sufficient data recorded the amount of building stone extracted.
English Heritage	English Heritage strongly advises that the conservation and the archaeological staff of the councils are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policies or proposals can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic sites.	Conservation and archaeological staff will be consulted on drafts of SA reports during drafting and through the site assessment methodology process.
English Heritage	Finally, we should like to stress that this opinion is based on the information provided by you with your letter correspondence received on 18th May 2013. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.	Comments noted.
SA20	We welcome the recognition in the leaflets and documents that there is a need to reduce waste; move up the waste hierarchy; and the recognition that provision must be made for all waste types including low level radioactive waste. The Plan needs to move up the waste hierarchy.	Comments noted. This is reflected within SA objective 9.
SA20	The approach to a call for sites is also welcomed, as is the Sustainability Appraisal.	Comments noted.
Environment Agency	In terms of the scoping report this is very thorough and rather overfacing. There is one small bit that bothers	The matrix has been revisited and further explanation added as to why

	<p>me a little and that is section 6.6 in Volume 1 - the internal compatibility matrix (and table) for sustainability appraisal. I think it stretches credibility that so very few objectives are uncertain and none are even potentially incompatible. Quite a few are potentially incompatible I would have thought, but need not be if certain measures are taken / safeguards are put in place.</p>	<p>uncertainties have been identified. Where objectives are potentially incompatible this is where 'uncertain' is scored. Incompatible should only be scored where it is not possible for the two objectives to operate alongside each other.</p>
Environment Agency	<p>Q1: Groundwater: We are pleased to note that Table 3 of the Sustainability Appraisal Scoping Report, May 2013, has captured all the main documents of concern to the Groundwater and Contaminated Land team of the Environment Agency. The table lists the Regional River Basin Management Plans. Specifically, we recommend that the Humber River Basin Management Plan, produced by the Environment Agency, is referenced and taken into account in the Minerals and Waste Plan. It is available from the following location on our website: http://www.environment-agency.gov.uk/research/planning/124803.aspx . The river basin plan covers the whole of the minerals and waste plan area. The river basin plan is about the pressures facing the water environment in this river basin district, and the actions that will address them. It has been prepared in consultation with a wide range of organisations and individuals and is the first of a series of six-year planning cycles. Specifically, it highlights failing water bodies in the region, dividing it into failures in water quality and failures in water quantity. In the case of minerals planning, interruptions to flow quantity or directions will be of concern, especially in already failing water bodies but also in water bodies deemed to be at good quantitative status, as we have a statutory obligation not to allow good water bodies to degenerate to poor.</p>	<p>The Humber River Basin Management Plan is explicitly referred to in the review of PPPSI.</p>
Environment Agency	<p>Certain types of mining may also generate contaminative end products and this could have implications for the qualitative status of water bodies throughout the region. Table 6 of your Sustainability Appraisal Scoping Report, May 2013 references the Groundwater Source Protection Zones. You should be specifically aware that our most stringent restrictions are applied to Source Protection Zone 1. Our guidance document entitled Groundwater protection: Principles and practice (GP3) November 2012, Version 1 describes our approach to the management and protection of groundwater in England and Wales. It provides a framework within which we can work with others to manage and protect groundwater, and includes mining activities. It is available from the following location on our website:</p>	<p>The specific types of restoration will not be considered by the SA. However the SA will help ensure that any schemes proposed are in line with environmental good practice.</p>

	<p>http://www.environment-agency.gov.uk/research/library/publications/144346.aspx Specifically, we would ask that quarry restoration schemes avoid the infilling of the void in order to return it to agricultural land. Open holes are more protective of groundwater as the infill materials have the potential to introduce contaminants into the water environment.</p>	
Environment Agency	<p>Groundwater: We are pleased to note that Table 3 of the Sustainability Appraisal Scoping Report, May 2013, has captured all the main documents of concern to the Groundwater and Contaminated Land team of the Environment Agency.</p>	Comments noted.
Environment Agency	<p>The table lists the Regional River Basin Management Plans. Specifically, we recommend that the Humber River Basin Management Plan, produced by the Environment Agency, is referenced and taken into account in the Minerals and Waste Plan. The river basin plan covers the whole of the minerals and waste plan area. The river basin plan is about the pressures facing the water environment in this river basin district, and the actions that will address them. It has been prepared in consultation with a wide range of organisations and individuals and is the first of a series of six-year planning cycles. Specifically, it highlights failing water bodies in the region, dividing it into failures in water quality and failures in water quantity. The main concern for new waste sites will be how they affect the quality of water bodies in the region, and whether they contribute to preventing a failing water body from achieving good status, or whether they jeopardise the status of water bodies that are currently designated as good.</p>	<p>The Humber RBMP is taken into account specifically within the report and PPPSIs. Water bodies affected by the Plan are taken into account within sustainability objective 2.</p>
Environment Agency	<p>Table 6 of your Sustainability Appraisal Scoping Report, May 2013 references the Groundwater Source Protection Zones. You should be specifically aware that our most stringent restrictions are applied to Source Protection Zone 1. Our guidance document entitled Groundwater protection: Principles and practice (GP3) November 2012, Version 1 describes our approach to the management and protection of groundwater in England and Wales. It provides a framework within which we can work with others to manage and protect groundwater, and includes waste activities. It is available from the following location on our website: http://www.environment-agency.gov.uk/research/library/publications/144346.aspx</p>	<p>These issues will be explicitly taken into account as part of the site assessment methodology.</p>
SA45	<p>Whilst your Sustainability Appraisal is full of noble sentiments about using good science and recognising that the environment is the ultimate support for all economic activity (I welcome the revision made to the</p>	<p>Comments noted. The issues that are mentioned are all sustainability issues that are relevant to the Plan area and have been identified by</p>

	<p>previous economics/ society/ environment Venn diagram used on the earlier Minerals and Waste Framework document!) , the actual scoping seems to lose a lot of this focus. It appears to encompass sustainability, impact on the historic environment, job creation, inclusivity - even leisure opportunities. These are not the same things as sustainability, even by the broadest Brundtland definition. This document would perhaps be more accurately described as 'Inconvenient Secondary Considerations Document'. I do believe that the impacts on social inclusion and the historic environment are worth considering - in fact I would say that such quality of life issues, alongside an intellectually honest sustainability plan, should be placed at the heart of this process of public policymaking. Certainly I would place them more centrally when making decisions than providing a guaranteed 25 year income to AmeyCespa or a determination to facilitate the economically efficient extraction of minerals by large private interests. I look forward to re-responding at the next shifting of the goalposts.</p>	<p>the SA scoping report already. The policies in the Plan will be assessed against SA objectives but must also take forward national policy relating to waste management and facilitating the supply of minerals.</p>
SA46	<p>In order to protect landscapes and the environment, rigorous systems must be established to ensure that sites worked have minimal impact on communities and in this difficult economic environment that secure finances are made available/secured to ensure that restoration of mineral and waste sites is ensured. Whether that is through planning and or legal and financial agreements. Prior to planning permission being granted for extraction of minerals, a clear strategy should be identified and agreed with the planning authority ensuring that disposal of waste is best used in line with the waste hierarchy, this must then be enforceable through the planning process.</p>	<p>These are detailed development management considerations that can only be considered by the Plan and not the SA. These comments will be passed over to the Plan team.</p>
SA46	<p>Selection of new minerals sites should be undertaken with full public involvement as these communities will have to live with the planning decisions taken for many years. Rigorous policies need to be implemented and enforced to protect the landscape and the environment and quality of life of the communities within which they exist.</p>	<p>The public will be consulted on at all stages of the Sustainability Appraisal process. The public will also be consulted as the Plan progresses.</p>
SA46	<p>Sustainability is an important area and reuse of products which are created as a by-products of mining should be of utmost importance and the creation of ways to use these products as secondary aggregates should be investigated and facilitated as part of the Minerals and Waste Strategy</p>	<p>A sub objective will be added to SA objective 8 stating 'promote the use of secondary and recycled minerals resources where they can play a role in reducing the need for primary minerals extraction'. This is also an issue for the Plan team and so this comment will be passed to them.</p>
SA46	<p>Joint Plan form Q2: See Q1 and 3</p>	<p>N/A</p>
SA46	<p>Is there a strategic overview of what is needed within</p>	<p>This is an issue for the Plan team</p>

	<p>the area of the plan? Our concern is that private companies put in planning applications for, as an example a waste incinerator at Kellingley Colliery, when potentially there is already one in the planning system the Allerton waste recovery park. It is clear that with 110 waste management facilities within the joint plan area, further proliferation is in no one interest, presumably a needs assessment has been undertaken?</p>	<p>and so this comment will be passed to them.</p>
SA46	<p>Can the Minerals and Waste Joint Plan influence in any way the proliferation of schemes put forward by private companies which may not be in the interest of the local community and may indeed cause harm, and may be unnecessary if a needs assessment had been undertaken?</p>	<p>This is an issue for the Plan team and so this comment will be passed to them.</p>
SA46	<p>Joint Plan from Q3: It would be very helpful if the Minerals and Waste Authority could take a strategic view of all Minerals and Waste projects across the area covered by this plan and facilitate collaborative working between the two streams i.e. minerals and waste. Examples exist in other areas where integrated collaborative working has taken place between for example quarry operators and collieries. Such collaborative working has benefitted the community and local environment in other areas. This also ensures that waste produced from coal mining which would otherwise end up at the bottom of the waste hierarchy under “disposal” rises to second to the top of the waste hierarchy under “reuse”. Again the use of planning policies should ensure that planning permission is not granted unless the operator can demonstrate they have fulfilled the requirements of the planning authority in so much as compliance with the highest level of the waste hierarchy- the level should be determined by the planning authority or the Minerals and Waste Authority for each type of waste not left to the operators discretion to choose where it fits.</p>	<p>This is an issue for the Plan team and so this comment will be passed to them.</p>
SA46	<p>There are a number of quarries around the area covered by NYCC which have voids to be filled and where material may have to be imported to fill these voids, equally there are a number of coal mines which are producing massive amounts of colliery spoil and have nowhere to tip this.</p>	<p>This is an issue for the Plan team to consider in planning for facilities.</p>
SA46	<p>Joint Plan form Q5: The Parish Council would appreciate being involved in any further consultation as this plan progresses. We have a number of Minerals and Waste sites within our area which have an impact on local amenity.</p>	<p>Consultees who have expressed an interest in the Joint Plan will be updated as the Plan progresses.</p>
SA47	<p>The accompanying SA and SEA work appears to be well judged in content and appropriate for the plan.</p>	<p>Comments noted, thank you.</p>

Appendix 2: Joint Minerals and Waste Plan Sustainability Appraisal Scoping Report Workshop Session 1 Outcomes

Attendees to the workshops were asked to look through the proposed sustainability objectives, sub-objectives and indicators and provide comments on these and identify any gaps.

Table 2.1: Session 1 Comments

Sustainability Objective	Comments/suggestions	How this has been addressed in revised Scoping Report
1. Protect and enhance biodiversity and geodiversity and improve habitat connectivity.	Add indicator 'no. of SSSI sites affected by the minerals and waste plan'.	Indicator added.
	Record specific impacts of each planning application.	This will be outlined in the site assessment methodology and the subsequent assessment of sites that will take place.
	Local Nature Partnerships are not fully taken into account. The targets of LNPs should be reflected in the indicators.	- Information pertaining to LNPs will be added to the Scoping Report
	Flytipping could have an impact on biodiversity – indicators can be drawn from flycapture/waste data flow.	Indicators that take account of biodiversity are already included in the scoping report
	BARS (Biodiversity Action Reporting System) should be referred to.	This is referred to within the baseline.
	Group noted strong links to geodiversity in minerals work.	Comment noted
	Accessibility to geodiversity is important.	Comments noted, thank you.
	Would be helpful to differentiate between geodiversity and biodiversity SSSIs in the indicators.	This has now been split in the baseline and reporting.
	Would be good to add number of local geodiversity sites 'maintained and identified' to the indicators.	Currently local geological sites only exist in the part of the Joint Plan area in the Redcar and Cleveland part of the National Park. Work on identifying local geological sites in the remainder of the Plan area is currently being carried out. Further information will be added when the work is complete.
Higher Level Stewardship is coming to an	This has been highlighted in the scoping report and future	

	end, so indicators should refer to agri-environment schemes.	monitoring will measure agri-environment schemes.
	The word 'SINC' in the indicators may not cover all areas. The group suggested that SINC should be changed to 'local nature conservation or local biodiversity sites'.	Noted – this has been changed within the scoping report.
	The group suggested that the objectives should link in with green infrastructure strategies (Harrogate are currently developing a green infrastructure strategy). Minerals sites have an opportunity to contribute to green infrastructure through restoration.	This is covered by SA objective 14
	There was a suggestion that National Character Area profiles should be referred to in relation to biodiversity.	Comments noted – this has been added to the baseline.
	One comment was that the objectives and sub-objectives are pitched at about the right strategic level	Comments noted.
	It will be important to tie post-SEA monitoring in with EIAs in some way.	Comments noted. This will be considered when finalising the monitoring framework.
2. Enhance or maintain water quality and improve efficiency of water use.	The 'flow' of rivers should not be impacted – this is another quality indicator in addition to those specified within the framework.	Water Framework Directive status objectives and Catchment Abstraction Management Strategies are considered under SA objective 2.
	There should be no sites located in groundwater protection zones.	This is considered in the Site Assessment Methodology.
	Add sub-objective supporting re-use of water.	Comments noted – this has now been added into the framework.
	Include recycling water as opposed to use of fresh water, in the sub-objectives.	Comments noted – this has now been added into the framework.
	Flood storage should be pre-planned.	
	Sites within source protection zones should be minimised.	Comments noted.
	There should be a coherent plan for site	Comments noted.

	restoration within the Plan, rather than piecemeal restoration so that landowner agreement doesn't conflict pre-application.	
	Safeguard zones could affect water extraction.	Source Protection Zones are considered in the site assessment methodology
	Restore sites within source protection and safeguard zones to benefit biodiversity rather than agriculture.	Comments noted. The SA must balance competing opportunities based on local evidence, rather than ascribe policy positions.
	Both quarrying and waste management could have an impact of nitrate levels in rivers. The EA has data available to monitor supply and nitrate concentrations available in CAMs.	An indicator relating to water bodies achieving 'good status' is included in the SA Framework.
	Future mitigation (for consideration at later stages) included restoration for biodiversity, flood storage, open water course. Also, not to agree to type prior to development as this can result in poor restoration.	Comments noted
3. Reduce transport miles and associated emissions from transport and encourage the use of sustainable modes of transportation.	Sites should be located next to existing train lines for more sustainable transportation and to minimise disturbance to local communities (i.e. having less freight transport and not having to build new roads for transportation).	This is reflected in the site assessment methodology.
	Noise and disturbance from trains, lorries, etc. needs to be taken into account/measured in the assessment process.	Noise pollution will be considered in areas where this is an issue through the site assessment work, mitigation measures will also be set out where relevant.
	Add waste into second sub-objective	Comments noted, this has now been carried out.
	Re-word sub-objective 4 as it looks like minerals and waste sites should be close together	Comments noted, this has now been carried out.
	Minimise, rather than improve, congestion in the last sub-objective	Comments noted, this has now been carried out.

	Combine 2 nd and 3 rd sub-objective	Comments noted, this has now been carried out.
	Include waste transport in sub-objective 2.	Comments noted, this has now been carried out.
	Consider transport routes.	This will be done as part of the site assessment process.
	Travel plans should take into account Rights of Way and cycle routes.	The Sustainability Appraisal will take Rights of Way into account and cycle routes, specific travel plans will be implemented as part of individual schemes.
	Sites should be located, where possible, near to existing rail lines.	This is taken account in the SA framework; the site assessment methodology will specifically consider this also.
	Generally agreed that the objective covered the main transport themes.	Comments noted.
4. Protect and Improve Air Quality.	Links with objective 3.	Comments noted. Air quality is affected by other factors in addition to transport, so they have been kept separate.
	All minerals sites are monitored for dust so this data may be available for indicators.	. These issues are highly site specific so will be considered further in relation to the finalised ongoing indicators for the SA in the Environmental Report
	Dust and odour can be more significant at certain times of year.	
	The EA representatives suggested they would go away and think about air quality monitoring.	Comments noted. We will follow up this issue with the EA.
	Objectives about air quality are negatively phrased – should be framed more positively.	Comments noted – the wording has now been reviewed and revised.
	Considered that “reduce all emissions from new development” was not specific enough. Should be “compliant or improve on standards”. EA should be consulted on phrasing.	Comments noted. Will consider specific emissions connected will individual sites in the site assessment methodology/planning application stage.
5. Use soil and land efficiently and safeguard or enhance their quality.	Add in support for use of waste-derived composts.	Comments noted, this is a specific objective, composting is supported within the SA framework.
	Overlap with objective 9.	Comments noted, we will be keeping the objectives distinct, given the wider issues associated with each objective.
	Encourage on-farm composting.	Comments noted, this is a specific objective, composting is supported within the SA framework. This will also be a plan-

		led policy.
	There should be a policy against depositing waste in particular types of quarry sites, for example, filling sand and gravel sites with waste can result in problems with water pollution.	Comments notes, this will be for the Plan to consider.
	There shouldn't be permission for landfill of material that is biodegradable and has a recoverable nutrient value.	Comments notes, this will be for the Plan to consider.
	Brownfield land isn't always the preferred option for sites where there is high biodiversity.	Impacts on biodiversity will be considered in the SA framework. Where conflict may arise, this will be stated in the SA.
	The mitigation principle should be set out at an early stage – important to establish long-term viability including consideration of end use.	Comments noted.
	Acknowledgement of land type and understanding what land could be used for in order to determine end use is important in site assessment.	Site assessment will identify land use.
6. Reduce the causes of climate change.	An indicator to measure recycling should be added.	Included as part of objective number 9.
	An indicator to measure how many buildings are re-used should be added.	Comments noted – this is not specific enough to minerals and waste planning.
	Add a sub-objective to promote re-use of buildings.	Comments noted – this is not specific enough to minerals and waste planning.
	One point was that minerals are extracted where they are found, so there may be limited opportunity to locate close to railheads etc.	Comments noted.
	A question was raised as to whether existing land use captures carbon (so it may not just be about capturing carbon through future land management).	Comments noted. An indicator on land use change CO2 emissions is included under SA objective 6.

	As well as the 'energy hierarchy' the 'waste hierarchy' should be considered in objective 6.	The waste hierarchy is considered in objective 9 as it is specific to waste, crossover with climate issues will be picked up in the SA assessment.
	To tackle climate change 'renewable, decentralised energy' and 'local renewable systems' should be referred to in the sub objectives.	Comments noted – this is taken into account into the SA framework.
7. Respond and adapt to the effects of climate change.	Sub-objective referring to 'not susceptible to the effects of climate change' is a bit vague.	Comments noted – wording has been reviewed and revised.
	Should refer to not increasing flooding or affecting elsewhere.	Comments noted, crossover with the objective considering flooding will be taken into account in the assessment.
	A question was asked as to whether existing sites would also be subject to SA. The group agreed they would only be considered where they are likely to change during the plan period (e.g. extensions), however, cumulative effects with existing sites will be considered.	Comments noted.
	One comment was that the merits of joining objectives 6 and 7 together should be considered. All objectives should be 'smart' and well evidenced.	Comments noted – these objectives have been kept separate as they seek to achieve different things.
8. Minimise the use of resources and encourage their re-use and safeguarding.	There needs to be a policy on the promotion of recycling within the Joint Plan.	This will be considered as part of the plan.
	Figures for rubble and building materials from private companies would be useful in determining the market of such materials and The use of secondary aggregates and minerals. Central government are the only ones who can get information on this, local authorities will probably not be able to access this information.	Commented noted, should data become available, this will be considered as part of the plan.
	Add example to 1 st sub-objective re: not using high quality building stone for aggregates for	Comments noted – this is too specific for the sub-objectives.

	example.	
	'Wisely' is ambiguous – need to be more specific (in 1 st sub-objective)	Comments noted – this has been changed to 'efficiently'.
	Commercial waste needs to be taken into account in re-use and recycling – much can be re-used (for example, building rubble).	Comments noted, this is supported by the objective, but will also be considered explicitly as part of the Plan.
9. Minimise waste generation and prioritise management of waste as high up the waste hierarchy as practicable.	Waste should be separated - inert from non-inert waste, which would enable more re-use and recycling. There should be a policy of separation and re-use of minerals to encourage this.	Comments noted, this is supported by the objective, but will also be considered as part of the Plan. There may be potential to monitor how these types of waste are monitored.
	Add sub-objective to re-use materials that can be recycled and avoiding using materials	This is supported as part of the objective.
	Support re-use of buildings	Comments noted – this will be considered by the plan developers.
	There should be a presumption to use recycled aggregate wherever possible and this should be separated in the waste stream.	This is supported by the objective.
	Can inert waste be processed at quarries into aggregate?	Objectives 8 and 9 support the reuse of waste and the use of secondary and recycled resources.
10. Conserve or enhance the historic environment and its setting, cultural heritage and character.	Wording of objective should be re-worded along the lines of 'conserve and enhance the historic environment, heritage assets and their setting'.	Comments noted – this has now been changed.
	Sub-objective to protect the setting of York	This has now been added in to the bullet point list of first sub-objective.
	Focus seems to be on designated whereas 90% are non-designated.	This is supported by sub-objectives 3 and 4, and will also be assessed at the site assessment stage and development management stage.
	Sub-objectives – not clear what 'landmark monuments' are.	This has now been removed.
	4 th sub-objective should also refer to understanding	Comments noted – this has now been added.

	Sub-objective should support supply of building stone to preserve historic assets	This sub-objective has now been modified.
	Indicators should relate to effects of the Plan – effects on sites, no. of new discoveries through planning applications, measure enhanced knowledge and understanding, new sites on HER, amount of building stone extracted.	This will be considered when we approach the monitoring stages of the SA.
	Looked broadly fine. However, there is the potential for the sub objectives to consider the potential for improvements to the wider historic townscape and landscape.	We have now added ‘enhance’ into sub-objectives 2 and 3.
	In addition, the fourth sub objective should include ‘public understanding’ – i.e. ‘To improve access to, and enjoyment of, and public understanding of, the historic environment where appropriate’.	This sub-objective has now been modified.
	The group were confused by what ‘preserve and enhance local culture’ meant	This will be changed to cultural heritage.
	The group also agreed that the indicators were too reliant on English Heritage data, and should also consider Historic Environment Record.	This will be considered when we approach the monitoring stages of the SA.
	It will be important to also consider non designated historic assets (for instance York’s buildings of local but not national significance). In Darlington, Durham Archaeology helped identify areas of greater archaeological interest,	This will be considered when we approach the monitoring stages of the Plan/SA.
	Defining significance in relation to historic assets will be important	This will be considered at the site assessment stage via the focus groups.
	Potential for further understanding of local culture and patterns of movement in the	Understanding is incorporated into this objective.

	location process?	
11. Protect and enhance the quality and character of landscapes and townscapes	Add York to 1 st sub-objective	An additional sub-objective for York has now been added.
	Include Heritage Coast in 6 th sub-objective.	This has now been changed.
	Add sub-objective about protect character and setting of York	Covered above.
	8 th sub-objective – amend along the lines of ‘to co-locate waste facilities with existing uses where possible to reduce dispersed visual impact or in a way which fits in with the landscape’ (talked about example designed as an agricultural building).	This has now been changed.
	Add sub-objective re: maintain and enhance enjoyment and understanding of the landscape and townscape.	This is covered in objective 14.
	There are indicators in York’s plan to monitor effects on setting of the Plan.	Noted – this will be considered when finalising the monitoring framework.
	The sub objective ‘to protect and enhance local landscape/townscape character.....’ should be moved to the top of the list of sub objectives.	This has now been moved.
	The group questioned why the first sub objective ‘conserve and enhance the natural beauty and cultural heritage of the North York Moors National Park’ applied just to the National Park.	Considered above – now moved.
Traffic was seen as having a visual impact and was suggested to be considered in the sub objectives. One suggestion was to change a sub objective to ‘to protect and improve tranquillity levels and reduce sources of intrusion, such as light pollution, traffic and the visual impact of traffic’.	This has now been added.	

	Indicator 3 'ratio of standalone minerals/waste sites to sites located next to existing buildings' needs to be explained with a footnote.	This indicator is to be removed
	Green belt is not a designation	Yes it is.
	Reviews of cultural heritage have been undertaken in North Wales	Comments noted.
	One suggestion was that a sub objective should state 'ensure development does not compromise the purposes of designation of National Parks and AONBs'.	AONBs have now been added into first sub-objective, as have the Dales.
	The group suggested that national parks and AONBs should be given the same weight in the objectives.	Noted in the above comments.
	There was some uncertainty over the merits of using the indicator 'ratio of standalone minerals/waste sites to sites located next to existing buildings (NYCC)' – this seemed to the group to be appropriate in some landscapes but not in others.	This indicator is to be removed
12. Achieve sustainable economic growth and create and support jobs	Add consideration of the wider economy (national).	Comparisons of NY with England/GB are included in the baseline. Sub-objective 2 covers local and national levels.
	Reduced construction costs could be beneficial to economy	Comments noted.
	There needs to be markets for end products created by waste streams – are the markets there?	Comment noted, wider national initiatives support this.
	Very few re-processing facilities in North Yorkshire – paper is exported to Liverpool, glass to Barnsley and cans to Nottingham.	Comment noted.
	An indicator should be added - 'level of reserves' which can be drawn from the Local Aggregate Assessment.	This will be considered when monitoring the SA.
	The sub-objective 'to capture value from	Comments noted – this has now been changed.

	waste streams by creating saleable products from them' should have words akin to 'provide opportunities to use waste as a resource' added.	
13. Maintain and enhance the viability and vitality of local communities	New facilities could enhance community life.	This is covered by objective 14.
	Restoration can boost tourism.	This is covered in the first sub-objective.
	Job creation, training and volunteer opportunities should be 3 separate objectives, and should not just be related to site restoration.	Job creation is covered by objective 12.
	Offsite mitigation through S106 – provision of community infrastructure.	This will be a development management issue.
	Indicators should relate to site reclamation.	This will be thought about as part of the monitoring framework.
	In addition to comments on specific objectives, the point was made that Defra has done a waste arisings survey, which alongside the waste interrogator and an EA study of waste arisings in the north east, could be a helpful source of indicators.	Work is being undertaken as part of the evidence base for the Plan.
	The group agreed that tourism could be generated through minerals restoration. However, it will be important to be flexible in the approach to restoration. The tourism objective should be accompanied by a visitor numbers indicator – and not just the number of visits to historic sites.	This will be considered as part of the post SA monitoring plan.
	The group agreed that the indicator 'length of public rights of way network' would be good but noted this could be good or bad – diversions would add to length and so would new footpaths created through restoration.	This will be considered as part of the post SA monitoring plan.
The group suggested that Natural England	Number of hectares created will be considered as part of	

	ANGST standard could be made into an indicator.	post SA monitoring plan.
14. Provide opportunities to enable recreation, leisure and learning	Quarries can be turned into learning centres after extraction from them has ceased. Living landscapes should be taken into account for recreation and learning in the restoration process. Quarry sites should be restored to good quality habitats.	This has been passed to the plan team for consideration.
	This can be linked with biodiversity and creating BAP habitat and living landscapes.	BAP habitat created will be considered for monitoring as part of the post SA monitoring plan.
15. Protect and improve the wellbeing, health and safety of local communities	Fly-tipping may occur when quarries are not restored to a good enough standard, in this way, it makes it easy for people to think that they can dump rubbish in them. If they are restored to a high quality and used for recreation/learning, people would be less likely to dump rubbish (as they would also be filled). Landscaping in connection with re-use of the site can also reduce fly-tipping.	Development management issue and has been passed to the Plan team.
	There was some confusion about how the indicator 'Incapacity benefit claimants as a percentage of working age population' could be linked directly to this objective.	This is a proxy indicator that gives an indication of the wellbeing of communities.
	Noise pollution isn't measured in the indicators.	This will be considered for specific sites, there are no data on levels of noise across the plan area.
	We need to enable site security and to reduce fly tipping – landscaping can reduce the incentive to fly tip and can create more bio diverse settings.	Development management issue and has been passed to the plan team.
	The group commented on the relevance of the healthcare objectives.	This is contextual information that indicates the general health and wellbeing of the plan area.
	The group discussed that there are 3 phases which need to be considered for this	This is a development management issue and has been passed to the plan team.

	objective: construction, operation and restoration	
	It was considered that the sub-objectives should be more specific to health related impacts from waste and minerals.	The sub-objectives are relevant to minerals and waste development.
	Site specific work should consider decibels acceptable on a proximity basis.	Specific sites will be considered for the potential for noise to impact on local communities. Noise from sites cannot be quantified before development.
	Future analysis should consider pollution sensitive locations particularly in connection with water contamination and biodiversity	This is taken into account in the framework.
16. Minimise flood risk and reduce the impact of flooding	Areas for flood storage should be improved, disused quarries can be used for flood storage (upstream, to limit damage downstream).	This will be considered as part of plan policies.
	There are often failures with geo-engineered schemes – natural storage/alleviation is the much better option. This should be used wherever possible.	This will depend on specific sites, but these considerations will be taken into account.
	There should be a strategic use of sites for flood storage – enhance flood storage in this way.	This will be considered as part of plan policies.
17. Address the needs of a changing population in a sustainable and inclusive manner	The footprint of water use should be taken into account.	Sub-objectives under objective 2 relate to the use of water and its conservation.
	Water butts and other water-saving schemes should be used in minerals processing in order to conserve water.	This is a development management issue and has been passed to plan team.
	The local authority should specify that local resources should be used in the Joint Plan.	This is covered by several sub-objectives.
	Sourcing of resources should be done within the county – even large companies can specify sourcing of materials from the local area.	The SA objectives support local viability and vitality.

	There should be a short supply chain and recycled materials should be used along this wherever possible.	This is supported by objective 9.
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Table 2.2: General comments on Sustainability Objectives (e.g. missing themes)

Comment	How this has been addressed in revised draft methodology?
There is nothing about the managed aggregate supply system in the framework – this includes the requirement for steady aggregates supply	This is covered in objective 12.
There should be an explanation as to what the purpose of indicator is in the Framework is.	A more thorough explanation has now been added.
There needs to be some objectives/indicators for safeguards around sewage works.	This is a development management issue, although the implication of sewage works are covered by a number of SA objectives.
Some additional indicators could be drawn from district level LDFs	This will be reviewed for post SA monitoring.

**Appendix 3: Joint Minerals and Waste Plan Sustainability Appraisal Scoping Report Workshop
Session 2 Outcomes**

This task involved discussion around a ‘mock’ site allocation – each group had either a waste site or a minerals site with a brief description of the site and surroundings and the type and scale of the development proposed. The sites were highlighted on a map showing constraints. Attendees were asked to list the types of constraints that they felt would be relevant to consider and these were then compared against the draft questions in the Site Selection Methodology. Comments are in relation to the questions presented in the draft methodology against each sustainability objective rather than on the sustainability objectives.

Table 3.1: Session 2 Comments

Sustainability Objective	Comments on questions/suggested questions
1. Protect and enhance biodiversity and geodiversity and improve habitat connectivity.	De-watering could affect all land and habitats surrounding the site.
2. Enhance or maintain water quality and improve efficiency of water use.	Is the site likely to affect any water body (regardless of proximity)?
	Would it affect groundwater?
	Is the land sloping? Would it lead to run-off and where to?
	What is the capacity of drainage facilities?
	How high are current groundwater levels and what would the effects of de-watering be?
	Does the site slope towards receptors?
	Contamination of groundwater could affect nearby watercourses.
	Watercourses connected to the site could affect groundwater quality
	Groundwater quality is also affected by the underlying strata and the run-through rate of the groundwater (this would be the case at this site as it is located on a slope).
	Could Nitrate Vulnerable Zones be affected by a combination of nearby waste sites, plus potential deposition of farm waste at these sites (i.e. extra nitrates)?
3. Reduce transport miles and associated emissions from transport and encourage the use of sustainable modes of transportation.	A potential showstopper is whether the site removes or diverts water from a groundwater Source Protection Zone.
	What is the geology under the site? Is it a Source Protection Zone? Where are the abstraction licenses?
4. Protect and Improve Air Quality.	How close is the site to any village/town – would traffic go through this?
	Consider transport routes and the method of transport in addition to the effect on the communities that they pass through.
4. Protect and Improve Air Quality.	Perception of dust as well as reality should be considered.
	Is it windy? (Prevailing wind.)
	The group noted that objective 4 in the site assessment document should refer to ‘bio-aerosol’ exclusion zones. This is a potential showstopper for composting sites (if a house is within 300m of a site it is thought that Environment Agency policy is to object).
5. Use soil and land efficiently and safeguard or enhance their quality.	Smell should be in the air quality objectives .
	<i>No comments made</i>
6. Reduce the causes of climate change.	<i>No comments made</i>

7. Respond and adapt to the effects of climate change.	<i>No comments made</i>
8. Minimise the use of resources and encourage their re-use and safeguarding.	Is the site greenfield or brownfield?
9. Minimise waste generation and prioritise management of waste as high up the waste hierarchy as practicable.	<i>No comments made</i>
10. Conserve or enhance the historic environment and its setting, cultural heritage and character.	Consider visual impact of all buildings associated with the development.
11. Protect and enhance the quality and character of landscapes and townscapes.	Is the site screened?
	Is it in a high or prominent location?
	Is the site is on a slope can it be viewed?
12. Achieve sustainable economic growth and create and support jobs.	What is the market for the end product (waste treatment)?
	What is the feedstock?
	Potential for job creation in nearby area.
13. Maintain and enhance the viability and vitality of local communities.	First question under Objective 13 covers too many things and needs to be separated out.
	Second question should also cover reducing use of materials.
14. Provide opportunities to enable recreation, leisure and learning.	<i>No comments made</i>
15. Protect and improve the wellbeing, health and safety of local communities.	Objective 15 should also consider visual effects of transport.
	Litter from waste sites – would need to take into account waste blowing from sites and lorries and the topography of the site (i.e. where the litter would fall) and the impact that it might have on nearby towns or villages.
	Could trees provide adequate protection from strong winds that may blow waste from the site and also from the smell that could descend on nearby towns?
	Dust produced from the quarry could blow-off and affect the quality of surrounding water bodies and also affect groundwater and towns/villages.
16. Minimise flood risk and reduce the impact of flooding.	Objective 16 should include 'Is the development water compatible?' (E.g. sand and gravel.)
	Flash flooding and the impact on waste sites and also the local community where waste and pollutants from the flood may be deposited should be taken into account.
17. Address the needs of a changing population in a sustainable and inclusive manner.	<i>No comments made</i>

Other comments on the site assessment methodology:

Comments/questions
In Table 2 of the methodology, flood storage should be added as an opportunity.
Include the question – ‘Is the site/type of development needed?’
Include the question – ‘Are there existing sites that could meet the requirement?’ There should be a check that the site is needed in the local area – can other nearby sites already established do the job?
Include the question – ‘How can public opinion be taken into account in site selection?’
Include question – ‘Where is the market from which the waste will be brought in?’ There is a need to check that what the developer is proposing can actually take place/is viable.
Include question – ‘Is it already an industrial area?’
Development Management-type considerations that should be taken into account: Dust, odour, use of netting to avoid waste flying around, how run-off will be managed, how will public be engaged with?
How will scoring or weighting be applied? What is positive and what is negative?
Public engagement and acceptance is a big issue with siting of waste centres – we will need to engage with the public very early in the process to get ‘buy-in’ from community members.
Is the technology proven (in the case of energy technologies for waste)?
When allocating sites there will need to be a consideration of housing growth areas as this will exert additional pressure on land.
‘Should site assessment process discussion learn from the past?’ (I.e. assessments that took place in earlier iterations of minerals allocations work).
Public acceptability of the technology is important.
Mitigation measures should consider enhancements and opportunities for the sites in the long-term.

Appendix 4: Site Identification and Assessment Methodology Consultation Summary

A technical consultation on the Site Identification and Assessment Methodology took place from 7th August 2013 to 16th September 2013. Consultees included industry representatives, district and neighbouring councils, statutory bodies, environmental groups and individuals who had indicated they wished to be kept informed of developments in previous Sustainability Appraisal consultations. These consultees were contacted by e-mail in most cases. However, the Methodology was also placed on the North Yorkshire County Council website alongside a comments from which listed six questions.

The questions and the responses given to them are listed in tables 5.1 to 5.7 below.

Table 4.1: Answers give to Question 1

Respondent ID	Question 1: Do you agree with the means by which sites may be identified and the broad screening questions?	Project Team Comments
Site ID1	Yes, agree.	Comment noted
Site ID2	It is essential that geology is looked at in consultation with experienced industry geologists. Please consult [contact details deleted for privacy]. Sites need to have a sand and gravel resource of proven quality in sufficient volume to justify investment in planning costs and development costs. For some sites such as Home Farm Kirkby Fleetham there is a scoping Opinion, a draft EIA and site investigation report available.	Evidence will be gathered at a strategic level as per the assessment framework. Using information from EIAs that support planning applications that have already been approved may be helpful in validating data when considering the longer term future of the site and so will be referred to where available, however, Environmental Impact Assessments which are the subject of an active planning applications will not be referred to as the evidence presented may not have been scrutinised. <u>Action: a note will be added to the methodology to this effect</u>
SiteID4	None	Comment noted

SiteID5 – English Heritage	We support the means by which it is intended to initially identify sites and areas for potential minerals and waste development and the broad screening questions which it is proposed to use as an initial sift.	Comment noted
SiteID6	No. 1) Will need to consider potential cumulative effects, where sites for consideration lie in close proximity to each other or in close proximity to other major development sites. This information should be identified and agreed early on in the scoping stage of the assessment process.	Comments noted. Although the methodology as a whole is largely concerned with direct effects of individual mineral and waste sites, the findings of the methodology will inform the sustainability appraisal, which is required to consider cumulative effects. In addition, the panel will be asked to complete a proforma that asks about potential cumulative effects with other development. However, the point that early identification would be beneficial is accepted so the findings of the review of other plans and programmes that will be undertaken in the Habitats Regulations Assessment (and will also inform the SA) will be made available to the assessors at step 3 and the panel. <u>Action: include some text to show how the process of gathering evidence for cumulative effects in HRA / SA will inform both step 3 and the panel (step 4).</u>
Site ID6	No. 2) Methodology doesn't set out if the panel members will be involved in step 1 and 2 of the site selection process.	Comment noted. The panel members will not be involved in the first two stages as these are purely an initial screening and an information gathering stage,
Site ID6	No.3) HBC will need to be consulted on the scope of Steps 1 and 2 and the range of sites for selection	A further consultation when at Issues and Options Stage will be undertaken to obtain. This will include presentation of the data collected to date.

<p>Site ID6</p>	<p>No.4) Sites for selection should be given a recognised scoring system to enable the adverse effects to be judged comparatively.</p>	<p>Comments noted. Partly disagree. Sites will be scored on their overall impact relating to 17 sustainability objectives in the accompanying sustainability appraisal. A difficulty with allotting a score to every impact is that there is considerable divergence in views about the relative significance allotted to different impacts, even between professionals. Therefore the site assessment methodology will rank impacts across broad categories of significance, from major positive to major negative, while the SA will further refine this score.</p>
<p>Site ID6</p>	<p>No.5) Steps 1 and 2 should include a landscape site selection study supported by GIS capabilities enabling robust site assessments to be undertaken at early stages. Should consider using a site Appraisal Matrix. See Wiltshire and Swindon Draft Plan. http://www.wiltshire.gov.uk/consultation-wilts-swindon-draft-aggregate-minerals-site-selection-site-appraisal-methodology0509.pdf . Topics within the Site Appraisal Mix should include: biodiversity and geodiversity; historic and cultural heritage, human health and amenity, land use, landscape and visual, restoration proposals, traffic and transportation, water environment.</p>	<p>Comment noted. The starting point will be to use existing sources of information such as Landscape Character Assessment & any relevant information in the MLC work. The need for more detailed assessment will need to be kept under review depending on the development of the strategy and the nature of any site allocations ultimately required</p>
<p>SiteID7</p>	<p>Overall Lafarge Tarmac is supportive of the means by which sites may be identified and the broad screening questions to be used. We particularly support the statement that the judgement as to which sites and /or areas to exclude from further assessment will be based on a balanced one.</p>	<p>Comment noted.</p>

Site ID7	Nevertheless, the site identification and assessment methodology needs to distinguish between the two different land uses - a waste development would generally be a permanent development whereas in contrast minerals development is temporary and given that minerals are a finite natural resource they can only be worked wherever they are found (paragraph 142, NPPF 2012). Furthermore, in applying primary planning constraints, it should be recognised that some primary planning constraints are applied differently depending on the land use in question. For example in respect of the Green Belt; this is generally regarded as an absolute constraint for waste development, whereas minerals development is not considered inappropriate development in the green belt (paragraph 90, NPPF, 2012)	Comments noted. We agree that there are different requirements for minerals and waste development, though equally there are numerous requirements that apply to both, and in addition, minerals and waste development can be sub-divided into numerous types of development with different planning and environmental constraints. To address this, the site Assessment SA Framework (Step 3) includes a number of generic, minerals specific and waste specific questions. However, the SA Team accept that some additional text could explain some key differences in the planning context for minerals and waste. In addition, clearer demarcation of which sub objectives in the site SA Framework are applicable to minerals or waste only would be beneficial. <u>Action: add some additional text / formatting to illustrate how waste and minerals sites are distinguished in later stages of the methodology.</u>
SiteID7	Although the broad Screening Questions set out in Table 1 are supported, it is recommended that the column headed 'Progress to Part B of assessment methodology' is not just recorded as either yes or no. Rather a justification should be recorded, as appropriate, especially where the decision is not to progress to Part B.	Agree. <u>Action: reformat table so that 'progress' column is removed and replaced with a row at the bottom showing whether the site will progress further in the assessment.</u>
SiteID8	Yes	Comment noted
SiteID10	YES – BUT why aren't the Dales included? It seems odd that such a large area is omitted or do they have their own plan?	The Yorkshire Dales National Park Authority are producing a Local Plan which will contain policies on minerals and waste.
SiteID11 – Natural England	Natural England welcomes the screening of environmental 'showstoppers' within Step 1. This process could be completed alongside the HRA screening of likely significant effects upon Natura 2000 sites.	Agree. The screening of likely significant effects will be planned to coincide with the methodology.

SiteID12	Generally we agree. However it is not clear what is meant by the question 'is the site available for development within the time period?' What does available mean? For example if the landowner has not yet given consent for a site to be developed is the site considered to be unavailable? We consider that guidance in respect of the definition of 'available' would be helpful.	Comment noted. As a minimum there needs to be general landowner support for the development and there are no known physical or other reasons why the site could not be brought forward for development for the intended purpose within the relevant time period.
SiteID12	Also in respect of the question 'Are there any overriding major environmental constraints (for example the site is within an area of international significance, an SPA, SAC or Ramsar site, Groundwater Protection Zone 1 or functional floodplain)...' we consider that guidance in respect of the definition of 'international significance' would be helpful.	Agree. The language used in the broad screening questions should be made more concise so that all showstoppers are listed. <u>Action: remove reference to international significance and replace with list of showstopper constraints. This list will be SPA, SAC, Ramsar site, Groundwater Protection Zone 1 and functional floodplain.</u>
SiteID13	The RSPB agrees with the means by which potentially suitable mineral Sites and Areas may be identified.	Comments noted
SiteID13	The RSPB supports the inclusion of overriding major environmental constraints within the broad screening questions, including the specific reference to areas designated as being of international importance (SPAs, SACs, Ramsar sites, etc.).	Comments noted
SiteID13	However, it is worth noting that the development would not necessarily have to be located within the international designated site in order for it to be undeliverable. For example, if the development was located outside of the international designation but it could not be ascertained that there would be no adverse effect on the integrity of the site then consent could not be given until the sequential tests required by the Habitats Regulations were successfully met (footnote: i.e. the alternatives test, mitigation, reasons of overriding public interest and compensation. The Conservation of Habitats and Species Regulations 2010.	Comments noted. A Habitats Regulations Assessment is being prepared alongside the methodology.

SiteID13	<p>Whilst the RSPB recognises that international designations have the highest priority, it is important to note that paragraph 118 of the National Planning Policy Framework (NPPF) also specifies that development should not normally be permitted if it is likely to: - have an adverse effect in a Site of Special Scientific Interest (SSSI), either individually or in combination with other developments; and / or - result in the loss or deterioration of irreplaceable habitats, including ancient woodland. Therefore, where a development is likely to have these impacts then SSSIs and irreplaceable habitats should also be considered as overriding major environmental constraints</p>	<p>Comment noted. Partly disagree. SSSIs are not absolute showstoppers but that exception should only be made where the benefits of the development, at the site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest, so depends on detail of the proposal. SSSIs are considered from Step 2 onwards. With respect to other irreplaceable habitats we agree that ancient woodland and other irreplaceable habitats are extremely valuable, but that there are sometimes opportunities to preserve these areas in situ by adjusting, for example, the orientation of development. So while we consider these sites in step 2 and 3, we don't agree that they should be listed in step 1 of the methodology.</p>
SiteID14	<p>The identification of sites and the broad screening questions are appropriate.</p>	<p>Comment noted</p>
SiteID15	<p>SBC Planning Services support the broad screening questions.</p>	<p>Comment noted</p>
SiteID16	<p>Screening appears to be very “light”, with emphasis on broad sweeping opinion rather than a factual checklist, points system or traffic light style assessment. Should a site fail the screening is it then excluded from further assessment completely? If so, as a land owner I would simply challenge the validity of the screening as superficial. Thus the screening would be a pointless step. A more detailed screening is required.</p>	<p>Comment noted. The initial screening is intended as an initial check as to whether a site should be considered further. The limited number of questions is intended only to screen out a very small number of sites that stand no realistic chance of contributing to the plan. In addition, the methodology states that judgements will not be made on only one factor, but the balance of outcomes. However, should a site be screened out, the judgement will be made available to the site owner and that person will be able to offer</p>

		evidence to counter the judgement, which could allow sites to remain in the assessment process.
SiteID18	There are surface coal resources in the extreme western part of North Yorkshire, which the MPAs will be aware of as The Coal Authority has previously provided GIS data illustrating the spatial extent of this resource. This information was recently reissued to the three MPAs in June 2013. This mineral resource information can be used to assist in the identification of potentially suitable mineral sites and areas.	Comment noted. This information will help answer the question 'is the land / site likely to contain a viable resource of mineral?'
SiteID20	Yes	Comment noted
SiteID22	Yes	Comment noted
SiteID24	As broad screening questions they would seem sensible in the main but there doesn't appear to be any specific reference to proximity of human population at this screening stage. The presence of a vulnerable population close by is likely to be a major consideration when assessing acceptability in terms of air quality and noise later in the process. Although the proximity of human population is probably covered by the broad question on 'major environmental constraints' it is currently not clear if this would be the case and perhaps requires some further consideration with respect to wording of the questions.	Comments noted. The vulnerability of human populations differs between populations. Similarly different mineral and waste development can have substantially different effects on nearby populations. This is explored at Step 3 through a number of site assessment headlines and sub objectives. However, to capture human impacts a row will be added to the broad screening questions. <u>Action: Add a new row to the broad screening questions. Are there any major human population constraints such that the development type proposed is unlikely to be deliverable?</u>
SiteID28 – Environment Agency	Table 1 – Broad Screening Questions: The text refers to the importance of internationally designated sites (SPA, SAC or Ramsar) but makes no reference to sites of national importance such as SSSI's which are afforded similar protection from development or disturbance.	Comment noted. Partly disagree. SSSIs are not absolute showstoppers but that exception should only be made where the benefits of the development, at the site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest, so depends

		on detail of the proposal. SSSIs are considered from Step 2 onwards.
SiteID28 – Environment Agency	Flood Risk Sequential Test: It is unclear how or when the sequential test is to be applied to sites in step 1, stage 2. We would expect to see the sequential test applied at this initial stage to ensure sites can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. Figure 4.1 of the PPS25 Practice Guide should be adhered to.	A Strategic Flood Risk Assessment is being undertaken alongside the Site Identification and Assessment Methodology and will ensure that the sequential test has been undertaken for each site. Although flood risk is not an absolute showstopper for all sites (some of which are water compatible, or may be justified following the undertaking of an exception test) the preliminary findings of the SFRA will be made available at Step 1 to assessors if available, and full consideration of SFRA findings will inform Step 3 and be made available to the panel at Step 4. <u>Action: make explicit reference to the link between SFRA and this methodology within the document.</u>
Site ID29	Areas not just sites need to be subject to sustainability appraisal. Additional screening question: are there any overriding sociological constraints for example too near local housing or schools. Major infrastructure constraints should include the provision of viable transport links.	Areas will be considered in through the site assessment process (see methodology for approach to areas). We have included an additional screening question related to human population constraints.

Table 4.2: Answers to question 2

Respondent ID	Question 2: Are there any absolute showstoppers' to a minerals or waste development which we have not identified in the broad screening questions?	Project Team Comments
Site ID1	No, believe at this stage all areas have been covered.	Comment noted
Site ID2	The showstoppers are usually geological (quality issues or a resource too small to justify investment), other issues can often be addressed by mitigation measures. The Environment Agency should be consulted to establish which sites would not be able to dewater for access to mineral or abstract for mineral processing.	Comment noted. The broad screening questions already consider whether a viable resource of material is available (which would include whether sufficient quality of the material is available). Preclusion of dewatering does not necessarily mean extraction is unviable as some sites can be wet-worked. Further advice on dewatering will be sought from the Environment Agency and the assessment progresses.
SiteID4	None	Comment noted
SiteID5 – English Heritage	In terms of the historic environment, there are no absolute show stoppers. Whilst there are several parts of the Plan Area where the heritage assets could be considered to be particularly sensitive in terms of certain types of minerals or waste developments (for example, in most circumstance it would be reasonably safe to assume that large-scale mineral extraction within or in close proximity to certain designated areas would be incompatible with the purposes behind their designation (such as World Heritage Site, Grade I and II* Registered Parks and Gardens, Registered Battlefields)), even within such areas there may still, potentially, be locations where some development might take place without causing substantial harm to the significance of those assets. The Managing Landscape Change Study should greatly assist the Council in identifying those areas which are likely to be of greatest sensitivity in terms of heritage assets together with those areas where there is likely to be scope for minerals development without resulting in significant harm to the area's environmental assets.	Comment noted. Managing Landscape Change is referred to in the methodology as providing contextual information.

SiteID6	<p>Yes. It is not clear how the assessment methodology will fit with the SEIA/EIA. This needs to be clarified. HBC should be given the opportunity to comment on any scoping responses where they are required to ensure that all environmental effects are taken into consideration.</p>	<p>The broad screening questions are intended as a preliminary step towards sustainability appraisal of sites, which is picked up at step 3, informed by step 4 and will go on to ultimately inform the Sustainability Report. The Sustainability Report will help inform the scope of future project level EIA. The assessment team accept that the relationship between site assessment and the Sustainability Report might be better clarified. <u>Action: Include a diagram to explain how the SA Process and the site assessment process overlap.</u></p>
SiteID7	<p>No comments to make.</p>	
SiteID8	<p>Needs to include a negative screening score if the site is within a National Park as this should be viewed as an overriding environment. This step should also have some consideration of the proximity of residential, schools, hospitals etc.</p>	<p>Graded scoring will be undertaken in step 3, at which point National Parks will be considered, however, National Parks do contain quarries and may contain waste sites so cannot be considered a showstopper.</p>
SiteID10	<p>This seems to cover all aspects</p>	<p>Comment noted</p>
SiteID11- Natural England	<p>In addition to internationally significant nature conservation sites, Natural England considers potential developments within nationally significant Sites of Special Scientific Interest (SSSIs) as severely constrained. The existence of a SSSI should be considered a 'showstopper.'</p>	<p>NPPF (118) does not say SSSI are showstoppers but that exception should only be made where the benefits of the development, at the site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest. SSSIs are considered from Step 2 onwards.</p>

SiteID12	We consider that the questions in step 1 are so broadly worded that any 'showstopping issues' should be identified by the questions. However further guidance as suggested to clarify some of the terminology may be helpful.	Comments noted / agree. See previous comments on 'international significance' and 'available' definitions above.
SiteID14	It is considered that there are no further showstoppers	Comment noted
SiteID15	Consideration should be given to whether the presence of national or international grade archaeological assets and scheduled monuments should be viewed as a showstopper. To provide an example in Scarborough Borough, Starr Carr is a Mesolithic archaeological site which is recognised as being of international importance.	Comment noted. Often there are coalescences of historic features that count towards their significance. These will be considered at step 3. Depending on their significance they may indeed 'stop the show', but due to the interpretive nature of these assets in terms of determining their significance they are not suitable for inclusion in the step 1 broad screening questions, which are meant as initial screening appraisal.
SiteID15	Another potential showstopper of particular relevance to Scarborough Borough, being a coastal resort, is the coastal erosion zone. Areas of potential cliff retreat have been identified through the Shoreline Management Plans and minerals extraction in such areas that have the potential to adversely affect erosion rates should be resisted.	Agree. Predicted Shoreline mapping is available in the SMP however this is not available as GIS. If sites are situated on the coast then the predicted shoreline will be referred to. <u>Action: include predicted shoreline for coastal sites and add this to list of datasets in methodology.</u>
SiteID16	The proximity to residential areas does not feature. For some types of M/W uses this would not be problematic, however for others there would likely be noise/smell/vibration issues etc. This could feature in the screening or in the mapping under Q3 below.	Agree. Proximity to residential areas will be recorded (listed as built development in table 2), this will be further tested via review of aerial photographs (if up to date) and site visits. <u>Action: add aerial photographs to step 2.</u>
SiteID18	No.	Comment noted.
SiteID20	Seems a reasonable list.	Comment noted
SiteID22	No	Comment noted.

SiteID24	Ability to comply with EU directive on PM2.5 and other international and UK air quality standards and objectives could be a potential issue if there are already other major sources of air pollution in the area, existing AQMAs or potential for large amounts of HGV traffic to be generated. Proximity to a human population will in turn determine how significant these issues are likely to be.	Comments noted. AQMAs and AQMAs close to being declared will recorded in the methodology as well as consideration of transport related data.
SiteID28 – Environment Agency	Sites that are located on potentially contaminated land may have large costs associated with developing them, regarding the necessary remediation. We feel the financial viability of carrying sites forward should be recognised in the broad screening questions, or associated text. If the costs are so high that a site becomes undeliverable, this has obvious implications for the allocations.	Contaminated Land Registers are available at District Councils and for the City of York. These will be checked where there is substantive evidence that land might be contaminated (e.g. where a historic use at the site may have led to contamination)
SiteID28 – Environment Agency	We agree with the inclusion of Groundwater Source Protection Zone 1 as a major environmental constraint	Comment noted
SiteID28 – Environment Agency	The supporting text on page 6 states that the judgement on whether or not to take sites forward “will not be based on a single negative outcome”. In certain circumstances, such as where development would negatively impact upon a Natura 2000 site, development would not be permitted under any circumstances.	There are derogations in the Directive that allow development if some (admittedly very hard to demonstrate) conditions are met - however, this is likely to be a de facto showstopper for most minerals and waste development. <u>Action: Change the wording 'this judgement will not be based on a single negative outcome' to 'in most cases this judgement will not be based on a single negative outcome'</u>
SiteID28 – Environment Agency	The location of waste sites and the proximity of local receptors, i.e. housing development, may result in ‘showstoppers’. For instance, if a new waste site, or a proposed extension to an existing waste site, was proposed in close proximity to a sensitive receptor this may potentially result in an environmental permit for this site being unattainable. Therefore we expect to see this highlighted within the broad screening questions.	Agree. <u>Action: Add a new row to the broad screening questions. Are there any major human population constraints such that the development type proposed is unlikely to be deliverable?</u>

Site ID29	A single negative in the screening should be enough to become a showstopper if financial investment is not able to overcome any infrastructure issues.	Comments noted. Wording in the document has been changed to 'in most cases this judgement will not be based on a single negative outcome.'
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Table 4.3: Answers to Question 3

Respondent ID	Question 3: 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 be collected through visiting sites)?	Project Team Comments
Site ID1	No additional constraints, opportunities or additional information.	Comment noted
Site ID2	The key to site identification and assessment is consulting at an early stage with industry geologists and Estates Managers not just the BGS.	Comments noted. We have included consultation stages on the methodology and scope at Issues and Options stage of plan production, and also on the findings of the assessment process at Preferred Options.
SiteID4	In the table of key constraints on Page 7, the preferred title for 'National Parks, AONBs and Heritage Coast' is 'Protected Landscapes', rather than 'Registered Parks and Gardens, Registered Battlefields' as listed.	The left column is not intended as a category, rather both columns list datasets available to the assessment. <u>Action: to avoid confusion the table will be re-formatted do that data sets are grouped into categories.</u>
SiteID4	In addition, 'Nature Improvement Areas' do not appear to have been considered as a constraint, under 'England Habitat Network and local habitat networks / Green Infrastructure corridors / Living Landscapes '.	Agree. <u>Action: Nature Improvement Areas will be added.</u>
SiteID4	On page 8, the methodology identifies the North Yorkshire and North York Moors LCAs. The Forest of Bowland AONB Landscape Character Assessment (2009) could also be added to this and	Agree: <u>Action: add AONB Landscape Character Assessments to list of desktop sources</u>

	considered in Site Identification and Assessment	
SiteID5 – English Heritage	In terms of the historic environment, Table 2 has identified the majority of assets which will need to be taken into account in identifying suitable locations for mineral and waste developments. The only amendment which needs to be made to the Table is the deletion of Protected Wrecks. The only one in this part of the country (the Bonhomme Richard) lies in Filey Bay. As such, one would hope that neither mineral nor waste allocations put forward in this Plan will affect it.	Comments noted: <u>Action: Remove Protected Wrecks from Table 2.</u>
SiteID6	Yes. Need to include the buffer zone to any designations e.g. WHS buffer zone.	Action: include reference to WHS buffer zones (available from English Heritage National Heritage List)
Site ID6	Important views and skylines.	County and district level Landscape Character Assessments will be consulted as well as the City of York Heritage topic paper.
Site ID6	Table 2 should include archaeology of national importance (NPPF 139), and also locally important heritage assets (NPPF135). The assessment must include consideration of both direct impact and indirect impact, the setting of heritage assets often contributes significantly to the significance of heritage assets (NPPF132). Remembering, the greater the significance of the heritage asset, the greater the weight attributed to its conservation.	The Heritage Gateway includes the Historic Environment Record and will be consulted. However this is a web map (rather than GIS) tool, so mapped information cannot be presented on overlay maps. So like some other data sets it will be used as additional contextual data. <u>Action: include a complete list of contextual datasets in appendix.</u>
Site ID6	There will be a need to carry out a landscape sensitivity and capacity study. Refer to Peterborough study. Http://www.peterborough.gov.uk/pdf/env-plan-ldf-myladpart1.pdf where the objective was to carry out an assessment of the likely capacity - the extent to which each site could accommodate mineral / waste development, without significant detriment to its character or that of its larger character area, taking into account current practice of mitigation and re-instatement.	Existing sources of information such as Landscape Character Assessment & any relevant information in the Managing Landscape Change work will be used. The need for more detailed assessment will need to be kept under review depending on the development of the strategy and the nature of any site allocations ultimately required

SiteID7	We support the key constraints and opportunities set out in Table 2. In terms of 'allocations in District Local Plans' not all such allocations should be regarded as potential constraints; such allocations, especially employment land allocations, can also provide opportunities for potential waste sites in particular.	Comment noted / agree. Step 2 explains that the datasets to be mapped include both constraints and opportunities.
SiteID8	No	Comment noted.
SiteID10	I have some concern here in relation to taking note of 'other' District/Borough/National Park policies and plans concerning Minerals and Waste. As the whole essence of the plan is to be joint between the named authorities, it is essential that the same policies apply across the whole area. Without this agreement it would be possible for objectors to quote district/borough policies if these contradict the policies finally agreed by the MWJP!	The Joint Plan is 'Joint' in as much as it is a partnership between York, the North York Moors and North Yorkshire County Council. The District Councils within that area also produce plans, but these are not specific to minerals and waste. The plan makers are addressing this further as part of the Issues & Options consultation because both the Joint Plan, the NYMNPA, CYC plan and the relevant District/Borough (as applicable) plans will be material to determination of applications depending on the area under consideration.
SiteID11 – Natural England	Soils: As the Provisional Series of published MAFF ALC maps are intended for strategic use and are not sufficiently accurate for the assessment of individual sites Natural England advised (form dated 28 June 2013) that proposed minerals and waste sites should be individually assessed to determine their specific Agricultural Land Classification (ALC).	Comment noted. Detailed soil assessment is usually a requirement of the application process. In this assessment we will utilise available datasets, though we will continue to review the need for further information.

<p>SiteID11 – Natural England</p>	<p>Landscape: Natural England is currently revising the National Character profiles. These identify landscape attributes, opportunities for enhancement as well as threats. Within our previous advice, we recommend that authorities should establish a framework for restoration at a landscape scale. The NCA profiles provide information that may be useful when determining restoration programmes and priorities for individual sites. Whilst not all the NCA profiles for North Yorkshire have been published (this should be achieved by April 2014), they can be viewed at http://publications.naturalengland.org.uk/category/587130</p>	<p>Agree. <u>Action: add NCA profiles to list of contextual information in proposed appendix</u></p>
<p>SiteID11- Natural England</p>	<p>Designated Sites: The conservation objectives for SPAs and SACs can be obtained from Natural England's website. Http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/conservationobjectives.aspx These should be used to determine, within the Habitats Regulations Assessment (HRA), whether a proposal that is likely to significantly effect a Natura 2000 site (determined through screening) will adversely affect site integrity (determined through the appropriate assessment). Natural England can provide further advice on the HRA, if requested.</p>	<p>Comments noted: HRA is underway for the Joint Plan and screening for likely significant effects will extend to sites.</p>
<p>SiteID11 – Natural England</p>	<p>In order to assess whether a proposal is likely to adversely affect a SSSI, the citation for the SSSI will be critical. These can be found at: http://www.sssi.naturalengland.org.uk/special/sssi/search.cfm</p>	<p>Agree. Potential impacts on SSSIs will be assessed against their citations, so data on these citations will be collated. <u>Action: add SSSI citations to list of contextual information in proposed appendix</u></p>
<p>SiteID11 – Natural England</p>	<p>Further information regarding sites, including priority habitat (formerly BAP habitats) can be found on the magic interactive website - http://magic.defra.gov.uk</p>	<p>Comments noted. <u>Action: refer to website when assessing impacts on priority habitats</u></p>

SiteID12	<p>It is considered that the list of constraints is comprehensive. Site visits and discussions with landowners / operators of proposed / existing waste or mineral facilities may identify other possible constraints. It may be helpful to provide the flexibility to consider other constraints not identified which may arise on a site specific basis.</p>	<p>Comments noted / agree. The methodology is complemented by information that will come from site visits. The point about flexibility is a good one and is addressed by step 3, though the methodology document does not explicitly state this. <u>Action: add some further explanatory text to Step 3 to explain how it is flexible enough to deal with site specific information.</u></p>
SiteID13	<p>Mineral site restoration provides a unique opportunity to help halt and reverse the current national decline in biodiversity. For example, mineral site restoration on its own has the potential to deliver 100% of the habitat creation targets for nine priority habitats and to make a significant contribution to the habitat creation targets of many more habitats (Footnote: Nature After Minerals: How mineral site restoration can benefit people and wildlife. RSPB / MIRO, 2006)</p>	<p>Comments noted</p>
SiteID13	<p>To help deliver this potential, Minerals Plans should: - identify and map how minerals sites (both individually and collectively) / Preferred Areas / Areas of Search fit in with the local ecological network; - plan positively for the creation, protection, enhancement and management of priority habitat on restored mineral sites such that they enhance the local ecological network and help to establish coherent ecological networks that are more resilient to current and future pressures. By doing this the Mineral Planning Authorities (MPAs) will be demonstrating compliance with paragraphs 109, 114 and 117 of the NPPF.</p>	<p>Comments noted. The Site SA Framework includes a sub objective: ' Is there an opportunity to enhance biodiversity or improve the connections between priority habitats?' In addition, local ecological networks will be mapped, so opportunities, where they occur, should be identified.</p>

SiteID13	<p>With these points in mind, the RSPB supports the inclusion of the following key constraints / opportunities in Table 2:</p> <ul style="list-style-type: none"> - The Natura 2000 Network; - Sites of Special Scientific Interest; - National Nature Reserves; - Sites of Importance for Nature Conservation / Important Bird Areas; - England Habitat Network and local habitat networks / Green Infrastructure corridors / Living Landscapes - Ancient woodland / Plantations on Ancient Woodland Sites; - UK Priority Habitats. 	Comments noted.
SiteID13	<p>Additional considerations that should be taken into account include:</p> <ul style="list-style-type: none"> - other landscape-scale conservation initiatives (in addition to Living Landscape), such as the Humberhead Levels Futurescape and the Forest of Bowland Futurescape / AONB; - nature reserves (e.g. Wildlife Trusts, RSPB, etc.). 	<p>As Futurescapes is available as a webmap tool this will be added to the list of contextual information and considered in relation to relevant minerals and waste sites. RSPB reserves will be the constraints / opportunities to be mapped table. Boundary maps for Yorkshire Wildlife Trust reserves are not available so we will map these as point data on maps if they cannot be sourced elsewhere. <u>Action: make additions to data gathering in step 2 as outlined above.</u></p>
SD13	<p>The RSPB supports the undertaking of Phase 1 habitat assessment for key Areas of Surface Minerals Resource Potential, as has been carried out in the North Yorkshire Planning Authority Area. The RSPB recommends that this Phase 1 habitat assessment exercise is extended to the North Yorkshire Moors National Park and City of York. This assessment will help to identify the appropriate habitats to be included in mineral site restoration plans and to identify how this mineral site restoration could contribute to the creation of a coherent and resilient ecological network.</p>	<p>This Phase 1 mapping was part of a bespoke 'Managing Landscape Change project and will be used where available.</p>

SiteID13	<p>As well as identifying potential constraints, the 'broad screening questions' should also identify the potential opportunities that mineral development could provide. For example, Worcestershire County Council is taking a restoration-led approach in developing its Minerals Plan. As part of this approach, one of the criteria that Worcestershire has used in identifying Areas of Search is the potential of the restoration of mineral sites in these Areas to provide significant ecosystem services (e.g. flood alleviation, recreation, biodiversity, etc.). Areas where there is a viable mineral resource but limited opportunity for delivery of significant ecosystem services have been excluded from Worcestershire's Areas of Search. The RSPB recommends that the Site Identification and Assessment Methodology follows Worcestershire's lead and incorporates ecosystem service delivery into the 'broad screening questions'.</p>	<p>Comments noted. An ecosystem services assessment was carried out on the headline SA objectives to establish how they might contribute to ecosystem services (see scoping report). Many of the questions under the objectives also relate to ecosystem services (such habitats' role in storing carbon and the potential for delivering flood prevention through restoration.</p>
SiteID14	<p>The following designations / constraints need to be considered: -Buffer zones that may be applicable with respect to Habitat Regulations designations / sites National Character Areas</p>	<p>The Habitats Regulations Assessment will consider a buffer of 15km around the Plan Area, and other Habitats Regulations Assessments will be reviewed for site specific buffers. <u>Action: include text in appendix 1 showing how information from HRA and SFRA will inform assessment.</u></p>
SiteID14	<p>Local landscape and site protection policies such as:- Regionally Important Geological / geomorphological Sites (RIGGs) - Ponds - Visually Important Undeveloped Areas (VIUAs) - Area of High Landscape Value (AHLV) - Ancient hedgerows / TPOs - Historic landscapes / archaeologically sensitive areas -HSE pipelines and Sites -Old Mine workings</p>	<p>Comments noted. District landscape designations (where saved), pipelines and mines will all be considered. Site visits, review of aerial photos will pick up other site features. Tree Preservation Orders are now available online for a number of local authorities and will be reviewed where available or efforts to obtain them will be made.</p>
SiteID14	<p>The identification of closed local quarries that were used for local stone needs that have the potential for reinstatement if necessary for repair and / maintenance of local buildings.</p>	<p>This is more relevant to site safeguarding policy work so will not be included.</p>

SiteID15	The list of key constraints is considered comprehensive.	Comment noted
SiteID16	It may be useful to include pipelines and their exclusion zones, as well as blast zones (e.g. surrounding chemical works), as these may limit sites.	Information would originate from HSE PADHI+ & individual pipeline operators (some may be wary of putting information in wider public domain). <u>Action: include HSE Pipelines and Sites and other pipelines to be included in table 3.</u>
SiteID18	Given the presence of coal resources in North Yorkshire, there exists a legacy of past coal mining activities. This legacy can potentially present land instability hazards to new development. The Coal Authority is therefore pleased to note that "Land instability" is identified as a key constraint/opportunity to be mapped in Table 2.	Comment noted
SiteID18	The Coal Authority has provided the Development Management teams of each of the three authorities with GIS data illustrating the spatial extent of coal mining hazards that potential pose a risk to new development. We would therefore expect that this information is used as part of a GIS mapping exercise to identify appropriate sites/areas.	Comment noted . <u>Action: add coal mining hazards into table 3</u>
SiteID20	Again a thorough list. The Trust is pleased to see that Living Landscapes are included. The only suggestion in mapping habitat networks would be to include information from the Yorkshire and Humberside Environment Forum based on the regional mapping from 2009 yhref.org.uk/pages/biodiversity-opportunity-areas-map	Comment noted / agree. The planning guidance for biodiversity opportunity areas will be added to the contextual evidence. <u>Action: Add biodiversity opportunity areas to Step 2 evidence.</u>
Site ID21		
SiteID22	As an opportunity, existing socio-economic information should be included in the GIS database. This should include data from the Indices of Deprivation in order to see where areas could benefit from new development. Another opportunity is to map areas where 'minerals of local and national importance' occur, as defined by the NPPF.	Agree: <u>Action: Add suitable Indices of Deprivation data to Step 2.</u>

SiteID22	<p>A constraint which should be taken into account is tourism. Specifically this should include data or the importance and popularity of tourist attractions (i.e. by annual income or visitor numbers). This data could be sourced from the Scarborough Tourism Economic Activity Monitor 2010 Report (Global Tourism Solutions (UK) Ltd, 2011) for example.</p>	<p>Agree. The presence of significant tourism attractions is a factor which will be picked up from site visits as part of looking at built/other development in the vicinity of a proposed site.</p>
SiteID24	<p>Built environment- could be separated into which is relevant for air quality (i.e. domestic, education etc.) and that which is not (i.e. offices, business parks - places of work). Definition of 'relevant' location available in Defra guidance on air quality.</p>	<p>Allocations for waste are unlikely to be technology specific and hence it is not possible to know with certainty the air quality implications. Where an allocation is proposed that could involve uses giving rise to significant air quality considerations, and where the site is close to sensitive receptors, this will be taken into account in determining the range of uses for which the site could be allocated (as indicated by the site SA framework at step 3).</p>
SiteID24	<p>Plotting of high pressure gas mains and national grid infrastructure could help identify energy from waste opportunities in terms of electricity generation and supply of bio-methane to the national gas network</p>	<p>The high pressure gas network and national grid is mapped as GI datasets and will be added Action: Add national grid (electricity and gas)</p>
SiteID24	<p>Plotting of likely site related HGV routes from proposed sites to county / LA boundaries and comparing this with existing AQMAs and other areas of borderline air quality to identify at an early stage the likely wider knock on effects of development traffic on the health of populations living alongside HGV routes and potential for additional AQMA declarations. For example if main approach to a waste disposal sites means refuse trucks from a number of authorities passing through a village 5 miles away this could have a significant impact on health in that village that won't be immediately obvious from looking at the allocation site in isolation. A similar argument can be made for the impacts of traffic noise.</p>	<p>Existing transport modelling studies and infrastructure delivery plans will be referred to.</p>

SiteID24	Existing processes in the area subject to IPPC permitting by either Environment Agency or Local Authority. Processes in other LA areas may need to be considered if there is potential for widespread dispersal of air pollutants that could result in cumulative impacts.	Cumulative air quality implications can only be assessed in detail at a project specific level and not at a general site allocation level.
SiteID24	Biomass boilers in the local area	Agree. Biomass facilities can be identified from http://www.biogas-info.co.uk/index.php/ad-map.html <u>Action: add biogas plants to list of data to be collated at step 2.</u>
SiteID24	Areas of significant population where there are no smoke control regulations in place and where domestic emissions of air pollutants from solid fuel burning may already be high. Further guidance on what numbers of dwellings may be significant can be found in DEFRA air quality guidance on review and assessment.	Cumulative air quality implications can only be assessed in detail at a project specific level and not at a general site allocation level.
SiteID24	There may be some benefit in noting agricultural use of surrounding land as installations such as large scale poultry farming and arable farming can give rise to significant levels of dust and other pollutants that combined with mineral / waste activities may result in unacceptable levels of some pollutants in populated areas	Consideration of surrounding agricultural use will be considered in relation to site visits. Ultimately cumulative air quality implications can only be assessed in detail at a project specific level and not at a general site allocation level.
SiteID28 – Environment Agency	We would like to see included in the key constraints table, two more constraints in relation to new developments, which are not mentioned and we feel are of high importance, high groundwater levels and high probability of land contamination from previous uses.	Flooding issues, including those from groundwater will feed into the assessment review / completion of strategic flood risk assessments. Contaminated land registers will also be reviewed if historic use of the site suggests that land contamination may be a significant issue.
SiteID28	Also, for completeness, local wildlife sites should be included in this table as these may exist as opportunities or constraints dependent on the development type.	Comments noted. SINCS are a type of local wildlife site, though for clarity the wording will be changed. <u>Action: change reference to Sites of Importance from Nature Conservation to Sites of</u>

		<u>Importance for Nature Conservation (Local Wildlife Sites).</u>
SiteID28	Natural England also hold information regarding Green Infrastructure, this could help to identify potential opportunities to provide greater connectivity	Comment noted. Table 2 includes a commitment to map green infrastructure. The data used is from Natural England.
Site ID29	Sites of Nature Conservation - should include wildlife corridors. Green belt should also include areas designated as open space.	Comment noted. Wildlife corridors and green belt are included. Consideration of allocations in local plans should reveal open spaces.

Table 4.4: Answers to Question 4

Respondent ID	Question 4: Do you have any comments on the site SA Framework? Are we asking the right questions of each site?	Project Team Comments
SiteID1	Suggest in addition to local authority professionals and key statutory bodies also look into possibility of involving appropriate independent experts.	Comments noted: Appropriate experts will be involved via the proposed panel (step 4)
SiteID2	Look at Scoping Opinions and EIA documents where available	Scoping Opinions and past EIA documents will be reviewed to validate data gathered elsewhere
SiteID4	None	Comments noted
SiteID5 – English Heritage	Proposed SA Objective 10 - It would be preferable to use the terminology of the NPPF. It is suggested that the introductory sentence of this objective is amended to read: 'is development of the site likely to result in harm to or enhance elements which contribute to the significance of the following:-'	<u>Agree: Action: change the sub-objective as suggested</u>

<p>SiteID5 – English Heritage</p>	<p>Proposed SA objective 10 - there are several parts of the Plan Area which either are or, potentially, could be exploited to provide building or roofing stone. Such areas could assist in helping to conserve important heritage assets and reinforce the distinctive character of North Yorkshire's settlements. It might be worthwhile including an objective which addresses this area, perhaps along the following lines:- "would the development of the site provide building or roofing stone which could be used to conserve the heritage assets of the area or reinforce the distinctive character of North Yorkshire?"</p>	<p><u>Agree: Action: include the sub-objective as suggested</u></p>
<p>SiteID5 – English Heritage</p>	<p>Proposed SA objective 11 - none of the proposed questions make reference to the impact which minerals or waste developments might have upon the landscape setting of the settlements in the plan area. This could be addressed through amending the fourth question as follows: "is the site likely to negatively alter or enhance the landscape setting of a settlement or its townscape".</p>	<p><u>Agree: Action: include the sub-objective as suggested</u></p>
<p>SiteID5 – English Heritage</p>	<p>Proposed SA objective 11 - Mention should also be made of the Heritage Coast.</p>	<p><u>Agree. Action: add a sub objective "Will the Site affect an area of Heritage Coast?".</u></p>
<p>SiteID6</p>	<p>Need to clarify who will form part of the SA Team and what level of site assessment work will occur at this stage, it is not clear.</p>	<p><u>Agree: Action: the SA Team will be listed by job title and organisation in Step 3.</u></p>
<p>SiteID7</p>	<p>Lafarge-Tarmac is generally supportive of the site SA Framework, although we have the following observations to make: - For some of the objectives identified a distinction may need to be made between short and long term impacts.</p>	<p><u>Agree: the SEA Directive requires consideration of the timescale of impacts. While this will be considered in the accompanying sustainability appraisal we agree that impacts will differ in duration and that this will have a bearing on the panel's consideration of impacts. Action: modify the framework so that it considers short, medium and long term effects.</u></p>

SiteID7	Objective 3 - how is an 'unnecessarily long distance' from significant markets or sources' to be defined?	Agree. There is potential to make this clearer. Action: change question to 'Is the location justifiable given other factors (such as the distribution of minerals) or would the location generate more traffic impacts than alternative site options?'
SiteID7	Objective 11 - In applying the questions in support of the proposed sustainability objective, due consideration should be given to the level of protection afforded to national and local landscape designations	Comment noted. Significance of impacts is considered on page 22, though we accept that this could be further elaborated upon to help assessors consistently distinguish between national and local designations. <u>Action: include further guidance on significance in step 3.</u>
SiteID7	Objective 15 - The last question in support of this objective seeks to ascertain whether the development of the site would have an impact on levels of crime in the area. How will this be measured?	Indicators for SA objectives are listed in the Sustainability Appraisal Scoping Report. These will be further refined as the assessment progresses.
SiteID8	No	Comment noted.
SiteID10	I have grave doubts about the whole concept of sustainability – by definition any mining/quarrying is NOT sustainable. The resources being exploited are finite and thus when they have been used that is it! What you really are discussing are social/economic/environmental issues. I assume however that this idea has been foisted on the LA's by Central Government.	Comment noted. Whilst we agree that by definition, the extraction of finite resources can't be considered indefinitely sustainable (at least in human timescales), the site assessment framework is about considering how sustainable different site options are across a number of components of sustainable development (the sustainability objectives) and recommending more sustainable alternatives or mitigation.
SiteID10	Regardless of the above the appropriate questions are being asked and the importance of 'synergy' is recognised. Although, however careful and detailed these might be and no matter how detailed they are, almost certainly any scheme will no doubt have some unforeseen consequences!	Comments noted. Monitoring of the parallel sustainability appraisal will attempt to identify unforeseen consequences.

SiteID11 – Natural England	The list of questions within Appendix 1 should also determine whether the development would adversely affect a priority habitat or species. Whilst the second and third questions refer to locally identified nature conservation sites, and protected or nationally important habitats or species, protection of priority habitats should be explicit.	Agree. Use of the terms nationally important and locally important should be clarified. <u>Action: included a footnote to define nationally important (i.e. priority) habitats and species and sites.</u>
SiteID11 – Natural England	Natural England welcomes the assessment of biodiversity enhancement opportunities. This is consistent with previous advice that the minerals and waste plan should deliver a net gain in biodiversity.	Comments noted.
SiteID11- Natural England	The examination of landscape impacts should go further than enquire whether the development is within a nationally protected national park or AONB landscape. It should determine whether the impacts upon the protected landscape or its visual amenity will be significantly affected. The answer to this and the other landscape questions should be derived from a Landscape and Visual Impact Assessment of each potential allocation.	Comments noted. Existing sources of information such as Landscape Character Assessment & any relevant information in the Managing Landscape Change work will be used. The need for more detailed assessment will need to be kept under review depending on the development of the strategy and the nature of any site allocations ultimately required
SiteID12	To satisfactorily answer the questions asked may require detailed assessments. For example to answer the question 'would the site affect groundwater?' properly it may be necessary to carry out a detailed hydrogeological risk assessment which will take into account the development proposals and the site setting. In this example it should also be noted that just because a development may affect groundwater does not necessarily preclude the development. Similarly, to answer the question 'Are there likely to be protected or nationally important habitats or species on the site or within a distance where they are likely to be affected?' may necessitate detailed habitat assessment and / or species surveys and the potential impact may not preclude development. Whilst it is important to carry out these assessments as part of any planning application for development we would question whether such a potentially detailed approach is necessary to inform the Minerals	Comments noted. We agree that in most cases detailed assessments will not be required, rather the assessment will rely on a combination of desktop sources (drawn largely from the mapping at Step 2) and professional judgement. This will inevitably mean that the framework will report in terms of likely effects rather than confirmed effects in many cases. The assessment will not negate the need for detailed information at the planning stage.

	<p>and Waste Joint Plan. It may be preferable to make the question relevant to other guidance documents. For instance is the proposed type of development in the location proposed consistent with the Environment Agency guidance presented in Groundwater Protection: Principles and Practice (GP3)?'</p>	
<p>SiteID12</p>	<p>In category 3 the questions: 'how far is the site from significant markets?' and 'is the site accessible to employees?' are not appropriate for quarry developments as the location of the site is dependent on the location of the mineral and the issues should not be used as a method to assess the suitability of the site for inclusion in the Minerals and Waste Joint Plan.</p>	<p>Whilst mineral resource constraints will often be fundamental to determining the location of mineral sites, there may be circumstances where potential resources are extensive and more locational flexibility is available. In these circumstances distance to markets is relevant to consideration of traffic impact as is accessibility of a site to its employees.</p>

SiteID13	<p>The RSPB supports the proposed Sustainability Objectives 1 and, in principle, the questions that are being asked under these objectives. However, the RSPB suggests that some of the questions under proposed Sustainability Objective 1 are re-worded to better reflect the requirements of the National Planning Policy Framework (NPPF) - and to ensure more consistency in the suite of questions being asked – and that some additional questions are asked. For example, instead of asking: How far is the Site from a nationally designated or locally identified nature conservation site or network? Is this distance significant and could it cause harm? the question should be: Is the development likely to have an adverse effect on any Site of Special Scientific Interest (SSSIs) or locally designated nature conservation site or network?</p>	<p><u>Agree: Action: the wording of the sub objective will be changed to 'Is the development likely to have an adverse effect on any Site of Special Scientific Interest (SSSIs) or locally designated nature conservation site or network?'</u></p>
SiteID13	<p>If the answer to the first part of this question (in relation to a SSSI) is 'yes', then the implication is that the development should not be permitted (in line with NPPF, para. 118). If the answer to the question is 'yes' regarding locally designated conservation sites or networks, then the development should not be permitted until it can be ascertained that the adverse effects can be fully mitigated.</p>	<p>Comments noted</p>
SiteID13	<p>The question of distance should be asked of all levels of designation and habitat. For example 'How far is the Site from: -an international / national / local nature conservation designation? - Ancient Woodland? - Priority Habitat?</p>	<p><u>Agree: Action: the question will be included</u></p>
SiteID13	<p>The question: 'Does the Site contain any woodland or trees or is it likely to affect any adjacent woodland?' should specifically refer to Ancient Woodland.</p>	<p>Disagree: we feel that impacts on ancient woodland would be picked up by the preceding question. The question cited relates to all woodland (which, while not receiving similar levels of protection does often fulfil an important role as a potential reservoir of biodiversity or deliver important ecosystem services). Therefore it will be retained.</p>

SiteID13	The question: 'Is there an opportunity to enhance biodiversity or improve the connections between priority habitats?' should be split into two separate questions, focussing on: (i) delivering a net-gain in biodiversity (in line with NPPF, paras.9 and 109) and (ii) helping to establish a coherent and resilient ecological network (in line with NPPF, para. 109 and 114). The questions should be: - 'Will the development deliver a net-gain in biodiversity?' - 'Will the development - both individually and / or as part of a 'cluster' of mineral sites - help to establish a coherent and resilient ecological network by: creating significant areas of new priority habitat? / buffering and linking core areas within the existing ecological network?	Disagree: It is important to recognise that this is an assessment prior to the panel's review (Step 4). It is not possible to tell whether a development will deliver a net gain for biodiversity prior to deciding on the detail of mitigation (which will be noted by the panel and finalised in the Sustainability Report). In relation to the second part of the question it is felt that as several 'networks' are currently in circulation it may be difficult to gain consensus on 'core areas'.
SiteID13	Following the questions on habitats and woodland, there should be an additional question: Is the development likely to result in the loss or deterioration of irreplaceable habitats, including ancient woodland? If this answer to this question is 'yes', then the implication is that the development should not be permitted (in line with NPPF, para. 118). It is worth noting that 'irreplaceable habitats' includes ancient woodland but is not exclusively ancient woodland. Most priority habitats are 'irreplaceable' in the sense that newly created priority habitat takes a considerable amount of time (50+ years) to deliver the same level of biodiversity as a well-established area of the same priority habitat.	Comments noted / Agree: <u>Action: include the question 'Is the development likely to result in the loss or deterioration of irreplaceable habitats, including ancient woodland?'</u>
SiteID13	The RSPB supports the other proposed Sustainability Objectives and associated questions.	Comments noted
SiteID14	You may wish to consider a 'no direct link' score for the SA where there is no direct link between the nature of the policy and the nature of the objective.	Comments noted. We would generally categorise such impacts under 'no effect on the achievement of the SA objective' <u>Action: include a footnote to better define 'no effect'</u>
SiteID14	The questions appear to enable a balanced consideration of the sites.	Comment noted.
SiteID14	A further question regarding local distinctiveness could be added to proposed sustainability objective 10.	Comments noted. It is felt that references to distinctive character and historic character in the

		questions under objective 10 should cover this.
SiteID15	The 17 proposed objectives and associated questions are very comprehensive. SBC Planning Services has nothing to add to this list.	Comments noted
SiteID16	The SA framework appears to be well designed and appropriate for the subject.	Comments noted
SiteID18	No specific comments	Comments noted
SiteID20	The SA Framework looks fine although it may need some simplification so that the process does not get bogged down in too much detail.	Comments noted. We acknowledge there are a lot of questions, but only relevant questions will be asked of each individual site (so questions only relevant to waste will not be asked of minerals sites and vice versa), and many questions require only a simple check on a map, though there are a number of more technical questions. A review will also be undertaken of all sub objectives following consultation to remove areas of repetition or overlap. <u>Action: Ensure post consultation review removes repetition and overlap.</u>
SiteID22	Details should be made available of who completes the SA Framework (who is in the 'SA Team'?) and how and why those people are selected.	Agree. The details of the SA team will be included in the document. <u>Action: include details of SA Team</u>
SiteID22	Additionally, details should be given of how the scores are accumulated. It is unclear if scores will be given for each question that is asked of a site or just an overall score for each proposed sustainability objective.	Comments noted. Scores (++ to --) will be given for each sustainability objective and these will be an overall judgement of the performance of all relevant sub objectives. However, text will be included in the framework to detail how overall scores for each objective has been arrived at through consideration of sub objectives.

SiteID24	Objective 3 (Transport) - consider including a question relating to ability to harness bio-methane and use as a vehicle fuel either directly following onsite treatment and storage or via exporting to the main gas network for use elsewhere. Use of compressed bio-methane as a fuel could considerably mitigate some of the transport emissions arising from these sites.	Agree. <u>Action: add a sub objective 'Are there opportunities to utilise biogas or other sustainable fuels for transport from waste or minerals operations?'</u>
SiteID24	Is there potential for incorporating other sustainable transport infrastructure, e.g. charging points for electric vehicles for use by staff.	Agree. <u>Action: add a sub objective 'Are there opportunities to utilise biogas or other sustainable fuels for transport from waste or minerals operations?'</u>
SiteID24	Objective 4 - Air quality. - consider using term 'relevant locations' to describe sensitive populations.	The terms areas or populations are retained as we intend to apply this question to both human populations and sensitive habitats.
SiteID24	Other 'sites' likely to add to air pollution will not be limited to industrial sites, may need to consider domestic fuel use (solid fuel use), agricultural activities, biomass heating plants etc.	Comments noted. However, this is intended to consider industrial sites in the main – collation of other smaller sources would be a very large job that is beyond the scope of this strategic assessment.
SiteID24	Are there any areas close by or along likely transport routes where AQ objectives are close to being breached (the potential for new AQMAs as well as existing ones)	Agree. Action: remove 'Is the site in an Air Quality Management Area?' and replace with 'Is the site, or are likely transport routes, in or close to an Air Quality Management Area or near to an AQMA that is close to being declared?'
SiteID24	Objective 6 - Climate Change - consider potential for harnessing and using bio-methane (positive for both climate change and local air quality).	Agree. Action: insert 'could the site offer opportunities for renewable or low carbon energy production as part of its development for minerals or waste?'
SiteID24	Objective 8 - Re-use of resources - consider potential for bio-methane production, particularly via managed anaerobic digestion plants as an alternative to landfill / incineration - links back to air quality and climate change aspects	This point relates to moving waste up the waste hierarchy. This is covered in part by objective 6. However, an explicit link to resources could be made by including a question in objective 8. <u>Action: include 'Is the Site allocated for a purpose that is likely to move waste up the waste</u>

		<u>hierarchy (thereby reducing demand for future virgin materials)' in objective 8.</u>
SiteID24	Objective 9 - waste hierarchy - potential for biomethane production from digestion (as for objective 8)	We agree with the principal of this objective, but feel it is already covered by the broader sub objective 'does the site allow otherwise wasted resources to be utilised?'
SiteID24	Objective11 - Is a large stack likely to be needed to alleviate air pollution (especially in relation to incineration schemes).	We agree with the principal of this objective, but feel it is already partly covered by the broader sub objective 'Is the site likely to negatively alter or enhance a townscape'. If landscape were added to this sub objective it would be fully covered. <u>Action: alter fifth sub objective so that it reads 'is the site likely to negatively alter or enhance the landscape setting of a settlement or its townscape''</u>
SiteID28 – Environment Agency	In the appendix, we would recommend that under objective 2 (To enhance or maintain water quality...), a clear question about whether the site is likely to affect groundwater quality and quantity is included.	Agree: <u>Action: add a sub objective "is the site likely to affect groundwater quality and quantity?"</u>
SiteID28 – Environment Agency	Furthermore, under objective 5 (use of soil and land efficiently...) we would like to suggest the inclusion of the question "how will development on contaminated land affect the water environment?"	Agree: <u>Action: include a sub objective 'If the site is on contaminated land, how would its development affect the water environment?'</u>
Site ID29	The Sustainability Appraisal seems appropriate but the scoring system could be clearer.	

Table 4.5: Answers to Question 5

Respondent ID	Question 5: 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?	Project Team Comments
SiteID1	Yes, agree	
SiteID5 – English Heritage	We endorse the intention to use a panel of specialists to evaluate the likely effects of the potential mineral and waste sites and the proposed terms of reference.	Comments noted.
SiteID6	<p>The specialist panel should be assembled in sufficient time to contribute to Steps 1 and 2 and also the SA Framework stages (including the site assessments) stages of the process. The Panel should consist of disciplines that are to conduct assessments based on their respective areas of expertise (e.g. development control and environmental protection, flood risk, landscape character and visual intrusion, historic environment and built heritage, nature conservation, transport infrastructure planning and economic planning). Refer to Northamptonshire MWDP. http://www.northamptonshire.gov.uk/en/councilservices/Environ/planning/policy/minerals/Documents/PDF%20Documents/MWDFSiteAssessMethodology.pdf</p>	<p>Partly disagree. The Site Panel is intended as an objective means of reviewing and refining the collated information and analysis that has been collected in earlier steps (1 to 3). These steps will take a good deal of time to complete, so it will be important that panel members are not overly burdened by the detail of the data collation and initial appraisal. However, once all data has been collated panel members will have the opportunity to utilise this data and ask for refinements to data. We agree with the disciplines suggested, which closely align with those disciplines suggested in the methodology paper, however, we will add development control. <u>Action: add development control/management to the list of panel specialisms.</u></p>
SiteID6	The Methodology doesn't clarify how the main potential adverse impacts will be established from Site development. For example, the study should include an assessment of the landscape and visual effects (LVIA) based on the Good Practice Checklist and Guidance contained in the attached report. An LVIA methodology should be agreed with the Council prior to any assessment	The main adverse effects will be identified by considering the objectives and questions at step 3 and then reviewed by the Panel. This in turn will be reported in the wider sustainability appraisal. A combination of professional judgement, multi criteria analysis and critical path analysis will

	preparation.	support the methodology and the sustainability appraisal and adverse impacts will be referenced in relation to effects on the baseline established in the sustainability appraisal baseline. <u>Action: Clarify judgement processes in the methodology and ensure the methodology makes reference to how it will link with the SA baseline and indicators.</u> It is important that the methodology does not take on detailed issues that should be considered in EIAs and planning applications. These issues include the results of LVIA
SiteID6	The outcomes of any discussions of panel members should be shared with relevant professional officers in HBC.	Agree. All findings will be published and made available to both professional officers and the wider public.
SiteID7	Lafarge Tarmac support the qualitative scoring method proposed as set out in Appendix 1. Furthermore, we support the approach set out for consideration of sites by a specialist panel. In order for such an approach to be successful, it is imperative to secure the support of and engage as early as possible in the process with, staff from the key statutory bodies, namely the Environment Agency (both local and central based staff), English Heritage and Natural England.	Agree. The statutory bodies have been consulted on this report and will be invited to attend the panel if they are available.
SiteID10	This is a very sensible way forward. HOWEVER, I think that it is essential that any member of the panel is required to state if they have any 'special' interest in a particular site – e.g. live near the proposed site – could be defined by the Parish in which the activity is proposed and adjoining Parishes. Local Councillors have to declare interests and the same should apply to these panel members. I am not questioning the integrity of any potential panel member, but, with the best will in the world it is difficult to be totally objective if there is to be a waste disposal site or gravel workings at the bottom of your garden! Such a scheme would also protect panel members from any accusations of bias – with Minerals &	Agree. <u>Action: Review the terms of reference to ensure interests are declared.</u>

	Waste being such potentially serious local issues, vociferous objectors will look for anything that they can use to support their case.	
SiteID11- Natural England	Natural England supports the use of a specialist panel to review the initial SA findings. As the statutory advisor on the natural environment and SA we would welcome involvement with this panel. However the level of involvement will be dependent on workload pressures within our organisation.	Comments noted
SiteID12	We do not disagree with the panel approach proposed?	Comments noted
SiteID13	A 'specialist panel' could be a useful addition to the Site Sustainability Appraisal process. It is important that any representative selected to cover 'ecology and biodiversity' should be able and willing to promote this issue, as well as looking at impacts on designated sites and existing habitat.	Comments noted
SiteID13	One of the factors to consider when looking at 'the main likely opportunities arising from development' of sites, is the potential to: Deliver a net-gain in biodiversity, primarily through the creation of priority habitat on restored sites, such that the site makes a significant contribution to the creation of a coherent and resilient ecological network	Comments noted
SiteID14	The broad approach set out for consideration by a specialist panel appears appropriate. However, you may wish to consider representatives from each of the District Councils in the North Yorkshire County area.	Comment noted.

SiteID15	Yes	Comment noted
SiteID16	What is the process of updating the SA as a result of the panel debate? Should one panel member have concerns but others disagree the issue – is there a vote?	The panel will be asked to note down all relevant issues. This will then be used as the primary source for completion of the site aspects of the Sustainability Report (plus things like cumulative effects / refined mitigation / HRA considerations / monitoring proposals etc. will be considered alongside)..
SiteID18	The specialist panel and its terms of reference appear appropriate	Comments noted
SiteID20	The list and the TOR look fine. Within the Yorkshire Wildlife Trust there may be people with expertise in assessing mineral sites, [name deleted] our Regional Manager would be the best contact [contact deleted].	Comments noted. Due to the large interest in this panel we cannot accommodate everyone, so to ensure we get a balanced panel it will be restricted to local authority officers and specialists from the Statutory Consultees. All panel results will be made available for wider comment.
SiteID22	When answering 'is the site likely to be deliverable?' the panel should list what facts have led them to their decision, not what issues. The SA Framework requires 'Key Facts' are provided for consideration by the panel so their comments should be based on these facts.	Agree. <u>Action: remove reference to issues in table 4 and replace with 'factors'.</u>
SiteID22	Panellists should give examples or evidence which demonstrates why they have reached a particular view.	Agree. The 'panel comments' column is intended for this purpose but this will be made clearer. <u>Action: re-title the second column of table 4 to 'Panel comments (include examples or key evidence where applicable)'.</u>
SiteID22	Separate representations should be made for 'tourism' and the 'economy' on the panel.	Comment noted. This will depend on the availability of potential panel members.

SiteID22	Economic competition is a fundamental principle of the planning system, as set out in chapter 1 of the NPPF 'Building a strong competitive economy'. Is economic competition therefore to be viewed as an 'opportunity' by the panel.	Comment noted. Sustainable economic growth is the subject of an objective in the site SA framework that will be considered by the panel. There will be the opportunity to note economic development as an opportunity should the panel see this as an opportunity.
SiteID24	Yes a specialist panel is required. Panel must include specialists able to comment on air pollution issues, noise issues and opportunities for sustainable energy and fuel production (including anaerobic digestion to produce bio-methane for vehicle fuel or input into gas network). A direct reference to an Environmental Protection specialist should be made as these specific issues do not necessarily fall into the remit of 'sustainability' or 'transport' specialists.	Agree. <u>Action: the list of specialisms should be extended to include 'environmental protection'</u>
SiteID28 – Environment Agency	Regarding the arrangement of the specialist panel, we would recommend the separate representation of water environment, possibly by a hydrogeologist specialist, in addition to the flooding specialist.	Comment noted. This will depend on availability and how many people attend the panel.
Site ID29	Specialist panels should include Health Service representative and local residents and / or ward councillors.	Comments noted. Due to the dynamics of this technical panel it is not possible to accommodate a large number of individuals. However, extensive consultation will be undertaken on panel findings at preferred options stage.

Table 4.6 Answers to Question 6

Respondent ID	Question 6: Do you have any further comments on this Site Assessment Methodology Paper	Project Team Comments
SiteID1	No further comments at this stage	Comment noted

SiteID2	Ensure geology is prioritised in the initial stages in consultation with the industry and encourage sites without a Scoping Opinion to request a scoping opinion to clarify issues and mitigation prior to identification in the Minerals and Waste Plan	
SiteID4	None	Comments noted
SiteID6	The landscape character and visual intrusion matters should be assessed by a suitably qualified licentiate landscape architect with proven experience in waste and minerals site selection matters.	A landscape specialist will be invited to attend the panel and will have the opportunity to comment on all findings.
SiteID7	We have no further comments to make at this stage but would appreciate being kept informed on the progress of the Joint Minerals and Waste Plan.	Comments noted
SiteID8	No	Comment noted
SiteID10	No	Comment noted
SiteID12	There are 92 questions in 17 categories in the SA Framework. This is a detailed level of assessment which would take significant time to complete. Care should be taken that the approach is not excessively detailed at this stage and identifies only those major issues which would preclude a particular development. It should also be acknowledged that suitable mitigation can often be provided to minimise the potential impact of developments.	Comments noted. We acknowledge there are a lot of questions, but only relevant questions will be asked of each individual site (so questions only relevant to waste will not be asked of minerals sites and vice versa), and many questions require only a simple check on a map, though there are a number of more technical questions. Mitigation is dealt with at Step 4.
SiteID13	No	Comment noted
SiteID14	There are no further comments.	Comments noted
SiteID15	No further comments on the methodology but look forward to being involved as the Plan moves forward and the policies and potential allocations are drafted.	Comments noted
SiteID16	Other comments: Traffic effects on road capacity and routes through communities does not appear to be considered (other than through vehicle emissions in the SA). Consideration of transport modes does not feature – the Council opines that priority should be given to sites with rail/water access (if appropriate).	Objective 3 considers transport modes via the question 'Are there opportunities for sustainable movement of minerals or waste to and from the site? For example is there a railhead or a wharf that could be used nearby?'

SiteID16	It is not clear at what stage the sites are ranked, nor how the SA findings are combined with the desktop assessment and site visit notes. Again, a checklist would be useful, with point scoring or traffic light reporting. For transparency a detailed schedule should be produced at this stage, even if those decisions are taken later in the Plan preparation. That way stakeholders can be assured they are “comparing apples with apples” later down the line.	Once the panel have completed their review, the Site Sustainability Appraisal Framework results for each site will be updated. These will then 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 section below. Decisions on which sites to progress with would also need to be consistent with the preferred policy approach. The results will be presented at the Preferred Options stage of plan preparation.
SiteID18	N/A	Comments noted
SiteID22	No	Comment noted
SiteID24	It is important that the potential impacts of traffic on air quality are considered well beyond the immediate sites under consideration	Comment noted. Impacts of pollution away from roads will be supported using national guidelines (e.g. English Nature's 'the Ecological effects of diffuse air pollution from road transport' / evidence from Highways Agency Design Manual for Roads and Bridges.
SiteID24	There is a massive opportunity for the use of bio-methane as fuel for energy or as a transport fuel which should be high on the agenda when undertaking site screening.	Comments noted
SiteID28 – Environment Agency	We welcome the emphasis given to addressing resource efficiency and amenity issues.	Comment noted
Site ID29	Plain English Campaign criteria should be applied to the document	Comments noted. Efforts have been made to simplify the language in the report after referring to Plain English guidance, though there are some technical aspects to the methodology that have necessitated some technical description, though efforts have been made to explain technical terms so that no prior knowledge of the topic is required.

Table 4.7 Other Comments (these include comments made without using the consultation response form)

Site ID3	Comments	Project Team Comments
Site ID3	The Head of Planning has assessed the document with regard to the County Council's interests and priorities, functions and other material considerations. We have no comments to make on this consultation at this time.	Comments noted
Site ID9	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation. If you have any questions or need any further information please just let me know. More information on the role of MMO can be found on our website www.marinemanagement.org.uk	Comments noted
SiteID17	Thank you for the opportunity to comment on the above consultation document. Council officers have reviewed the document and I can confirm that Stockton Borough Council does not have any comments to make regarding the site identification methodology.	Comments noted
SiteID19	Thank you for sending me the information on the above, I note your request that responses are made by Monday 16 th September. Please find below response on behalf of UK Coal Kellingley Ltd and UK Coal Production Ltd, at the registered address of Harworth Park, DN11 8DB.	Comments noted

SiteID19	<p>As we have discussed in the numerous consultations, both in direct meetings and responses such as this, the issues that we face, especially in the form of disposal of colliery waste in the form of spoil, are somewhat unique and different to other mineral operators. As Kellingley Colliery is an underground mine, the disposal of waste (spoil) is not dealt with by placing back in the excavation void, as is the case of surface mining or quarrying. We have to rely on above ground tipping sites and haulage from the mine site to the tipping area. As such, I feel the comments form is not relevant in all areas and therefore I would prefer to make my comments to the methodology, detailed below, in the form of an email response. I understand from our correspondence of 31 July that this would be acceptable.</p>	Comments noted
SiteID19	<p>Identification of sites. Unlike the extraction of surface minerals, the sites that we require for spoil disposal do not have to be in particular locations for the presence of mineral, but they do have to be in areas which are suitable for disposing of spoil, relatively close to the mine operation and sites where commercial agreements can be made with the site owner. Identification of sites in the past has revolved around backfilling of old quarry sites. This is usually accepted as the most practical option. However we are limited to commercial agreements being able to be finalised with third party quarry operators, something which has not been particularly successful over recent years. An issue that we may have at Kellingley Colliery in the future is one where, for whatever reason, we were not able to reach agreement with the owner of an old quarry for tipping space, we are faced with looking at greenfield sites for above ground tipping. Therefore in response to this issue I would pose the question that asks if above ground tipping of colliery spoil would be acceptable on a greenfield site? The alternative could be as severe as the cessation of mining at Kellingley Colliery with the economic and employment issues that would follow such an outcome. Of course there will be many issues when one considers a</p>	

	greenfield site, such as landscape impact, but it also means that at this stage we will not be able to offer up any such sites as part of this process as we neither own or control suitable areas at the moment.	
SiteID19	You will be aware, of course, of the current planning application that is with NYCC for the extension of the existing Womersley Quarry site which is currently being used for the disposal of colliery spoil from Kellingley.	Comment noted. We cannot comment on current planning applications.
SiteID19	There is mention of an expert panel being set up to look at certain issues, I would be grateful to receive details of the timescale for this and the make-up of such a panel, the document outlines in broad terms its structure. I agree with the approach of a specialist panel to look at the Sustainability Appraisal Framework but assurances would be required that such a panel has the full breadth of expertise across the whole minerals sector.	Comment noted. The panel members will be drawn from the professions listed in the methodology where available.
SiteID19	If I was to focus on individual sites for waste (spoil) disposal, I would suggest that it is difficult to highlight greenfield sites, for the reasons stated above, but would urge that disused quarries that are suitable for receiving spoil are considered, NYCC will have a broader knowledge on locations than individual companies, therefore any proactive approach that Mineral Planning Authorities can make on this issue would be welcome.	Comment noted. The site assessment methodology does not make any assumptions about future local policy though the national planning and sustainability issues around all types of sites will be investigated.

SiteID19	<p>The issue of future coal extraction for Kellingley Colliery is more straightforward in one respect, the mineral is mined using underground techniques and the immediate visual impact is much less than surface operations. However, there are environmental issues with such topics as subsidence and therefore future planning applications for the extraction of coal have to take this in to account. You will be aware of the planning permission boundary that exists at Kellingley Colliery at the moment. There are further areas where coal could be extracted, these have been identified previously and would be the subject of full planning applications. It would, however, be remiss of me not to highlight the potential area where underground mining could take place as detailed in the public consultation held in 2012. Consultations were held in Pollington and Gowdall to show areas where it was proposed to mine coal in the future. Unfortunately these plans were not taken forward last year and no planning application was submitted. However, the coal could be worked in these areas in the future, subject to planning, and therefore I would not want these areas discounted or not considered.</p>	Comments noted.
SiteID21	<p>My specific interest is focussed on the York area at this stage. Nevertheless, I am of the opinion that the range of issues raised in the 'minerals and waste joint plan - site identification and assessment methodology' document dated July 2013 is most comprehensive and is certainly relevant to all Areas including York. Against this background, the response to this Site Assessment as currently drafted should provide a sound basis on which to evaluate the suitability of Minerals and waste Sites for the eventual Joint Plan for all Areas.</p>	Comments noted

SiteID21	<p>In general terms, perhaps I can suggest that the Joint Plan should ensure compliance with the following 'Planning Policy Statements' (PPSs) namely:-PPS19 (Planning and Sustainable Waste Management), PPS13 (Transport), PPS14 (Development on Unstable Land), PPS23 (Planning and Pollution Control), PPS24 (Planning and Noise), PPS25 (Development and Flood Risks).</p>	<p>Comments noted. Most Planning Policy Statements have now been replaced by the National Planning Policy Framework (PPS10 also remains in place which is of particular relevance to the Joint Plan). The Site Identification and Assessment Methodology and Joint Plan will be consistent with the coverage of all the listed topics as they are covered by current planning policy.</p>
SiteID21	<p>With regard to the suitability or otherwise of proposed new Waste Sites, the following constraints should be amongst those to be considered in depth: 1) The extent to which they support the policies set out in PPS10; 2) Protection of water resources and conversely locations subject to flooding; 3) Unstable land not normally being suitable for Waste facilities; 4) Any visual intrusion on the local environment such as the Green Belt or sites or buildings recognised to be of significant importance; 5) Traffic and access with regard to the road network and the extent to which access would require reliance on suitable local roads and their proximity to the Waste Site; 6) Is access to the proposed Waste Site unacceptably near to a main / very busy public highway or perhaps even on an established bus route etc.; 7) Air emissions, including dust, odours, and even the risk of toxic waste, which may require appropriate manned monitoring equipment at the Waste Site during working hours.</p>	<p>Each of the points raised is addressed in turn: 1) the methodology is considered to be broadly consistent with PPS10 however it is felt that the site SA framework could do more to promote re-use of redundant agriculture / forestry buildings (<u>Action: add a sub objective to promote use of redundant buildings to objective 8</u>); 2) Water is considered at Step 3; 3) Unstable land is considered at Step 2, but not well considered by Step 3 (<u>Action: add a sub objective relating to avoidance of unstable land to objective 15</u>); 4) visual intrusion is considered at Step 3; 5) Traffic is considered at Step 3; 6) Access is considered at Steps 1 and 3; 7) Air emissions are considered at Step 3.</p>
Site ID21	<p>8) Vermin and other such habitat, which could be attracted to waste sites; 9) Noise generated by Waste Management Equipment; 10) Litter can be a contentious issue at certain sites. Also the availability or indeed absence of essential public services such as sewerage, water, gas, electricity and security facilities such as street lighting etc.; 11) the availability of existing waste disposal opportunities in the region such as redundant airfields, brownfield sites, gravel pits, disused underground mine workings etc., which could provide waste disposal opportunities; 12) Sites of Special Scientific Interest; 13) Nitrate Vulnerable Zones; 14) Public Rights of Way and Open</p>	<p>8 and 9 are considered at Step 3. 10) Amenity issues are considered at step 3 however connections to utilities etc. should be considered as a development management rather than strategic issue; 12) SSSIs are considered at Step 2 and 3; 13) <u>Action: add Nitrate Vulnerable Zone to the list at Step 2</u>; 14) rights of way / open access land are considered at Step 2 and access is considered at step 3; 15) Existing waste sites will be considered at Step 1 (<u>Action: map active</u></p>

	Access Land; 15) Existing Waste Sites either active or dormant.	<u>and dormant minerals and waste sites at Step 2)</u>
Site ID21	It is understood that the Joint Plan will not focus at this stage on mineral development as far as York is concerned as the greater potential in this regard will exist in North Yorkshire.	The potential for minerals development in York is a matter to be addressed in the Plan and it is not yet known whether any development is likely; but a minerals site has been submitted through the 'call for sites' which will need to go through the due site assessment process.
Site ID21	I trust that you may find the above to be of relevance at this stage of the process. However, I would appreciate an opportunity to comment on any York sites which may be offered by landowners for the purpose of establishing Waste Sites in the York Area.	Yes, these have been made available as part of the Issues and Options Consultation.
Site ID23	We note the positioning of the waste and recycling sites and assume the site near Rufforth is ongoing. We don't know of the site north of Stockton on Forest.	Comment noted
SiteID23	We don't know the life of these sites but it is up to you to allow for this in time. Suitable land that is low lying and can be covered up and levelled off in time should be used.	Comments noted
Site ID23	We can only comment on the large hole which is now the Park and Ride car park at Grimston near the A1079 is a classic piece of planning. It took 7 years to fill and now it is excellent use of landfill?!	Comments noted
SiteID23	We hope you can organise such sites with as little as possible to the (vicinity?) they are put.	Comments noted
SiteID23	We note that the incinerator near the A1 past Green Hammerton has got approval. Hope it is successful.	Comments noted

SiteID25	Further to [Name removed - SITEID24's] initial response I would agree with her general comments. In addition I would advise that consideration to the potential impact of any site in relation to noise, dust and odour must be made. The suitable location of any such site is largely dependent on the proximity of receptors. And so as part of any screening assessment an indication of the numbers and location of residential dwellings must be made.	Agree: Amenity impacts are considered at objective 15, and odour is considered at objective 4. <u>Action: add reference to dust and noise in objective 15.</u>
SiteID25	In addition the impact of traffic on the local network and noise as a result must be considered as this could have the potential to result in loss of amenity to residents in the vicinity.	Agree. Loss of amenity (including by traffic) is considered by Objective 15.
SiteID26	Can you please add Registered Village Greens and Common Land to your list of constraints, these are mapped on GIS	Agree. A check will be made of Registered Village Greens and common land though these will need to be accessed from individual local authorities. <u>Action: add village greens to table 2.</u>
SiteID27	Overall the proposed methodology seems to be appropriate. When asking the broad screening questions and considering the infrastructure constraints the Highways would welcome consultation on the individual sites and will provide necessary highway feedback.	Comments noted. <u>Action: add Existing transport modelling / publicly available transport growth studies where available and Infrastructure Delivery Plans to table 3.</u> Further assessment will be considered later in the process only where a need for more detailed information.

<p>SiteID27</p>	<p>In terms of mapping the key constraints the Local Highways Authority (Highways NYCC) would request that the cumulative impact of traffic on the local road network (considering demands on Service Centres/ critical junctions etc.) is assessed. Clearly the routing of vehicles is going to have a significant impact on the network and should be considered as part of the allocation process, as well as appropriate mitigation measures where necessary. As part of their evidence base for their Local Plans a number of the Local Planning Authorities in North Yorkshire have engaged in necessary modelling work to identify the impact of committed and proposed development (residential and employment). Where necessary appropriate mitigation measures/ junction improvements have been suggested and included in their Infrastructure Delivery Plans. These assessments should be recognised and acknowledged as part of the scheme identification.</p>	
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