



Campaign to Protect Rural England
North Yorkshire Branch
registered charity 500333

13th October 2015

NY/2015/0233/ENV Kirby Misperton, North Yorkshire
OBJECT

Dear Sirs

Application NY/2015/0233/ENV

The Campaign to Protect Rural England (CPRE) does not oppose the exploitation of shale gas in principle provided it meets certain conditions.

Our primary aim is to ensure that the location and operation of shale gas sites do not harm the beauty and tranquillity of the English countryside. We are also concerned to ensure that the natural resources of the countryside, especially water, are not polluted or used unsustainably; and that it can be demonstrated how the exploitation of shale gas contributes towards meeting our climate change commitments consistent with established Government policy, for example by substituting for unabated coal use.

CPRE will oppose proposals which fail to meet these conditions.

The North Yorkshire Branch of the Campaign to Protect Rural England have commissioned KVA Planning to conduct in depth research into this application and prepare a report for this charity. We respectfully ask that the Council refuse this application for the following key reasons which are explained in depth in the attached report:

- The proposals are contrary to both national and local planning policies;
- The level of harm that will be inflicted on the landscape of the Ryedale countryside is unacceptable;
- The impact on the economy, including agriculture and tourism, in this and the wider location is unacceptable;
- The impact upon the residents of this part of Ryedale will be intolerable;

CPRE is gravely concerned that should this application be approved, the precedent will be set for hydraulic fracturing in North Yorkshire opening up vast swathes of North Yorkshire countryside as potential sites that will without any doubt impact adversely on the character and appearance of this outstanding countryside and ultimately have a negative and damaging impact on our tourism industry.

Taking all the matters raised into account, the impact of granting permission would significantly outweigh the benefits of the proposed development when assessed against the policies of the NPPF as a whole and local planning policies. We request the application be refused.

CPRE would welcome the opportunity to comment further with regard to this development proposal should further information be submitted by the applicant.

Yours Sincerely

Jules Marley
Chair

Campaign to Protect Rural England

North Yorkshire Branch Registered Charity 500333

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country

NY/2015/0233/ENV

To hydraulically stimulate and test the various geological formations previously identified during the 2013 KM8 drilling operation, followed by the production of gas from one or more of these formations into the existing production facilities, followed by wellsite restoration.

Plant and machinery to be used includes a workover rig (maximum height 37m) hydraulic fracture equipment, coil tubing unit, wireline unit, well testing equipment, high pressure flowline, temporary flowline pipe supports, permanent high pressure flowline and permanent pipe supports, at land at KMA wellsite, Alma Farm, Off Habton Road, Kirby Misperton, North Yorkshire

The following report has been prepared for the
Campaign to Protect Rural England (CPRE) North Yorkshire Branch
by
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of
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All replies and notifications should be sent to the Branch via email and to KVA Planning Consultancy.

Having had the opportunity to consider both the Planning and Environmental Statements and the associated appendices, submitted to the County Council in July 2015 alongside the application, CPRE North Yorkshire (CPRENY) feels strongly that this application should be refused planning permission on the following grounds:

- The proposals are contrary to both national and local planning policies;
 - The level of harm that will be inflicted on the landscape of the Ryedale countryside is unacceptable;
 - The impact on the economy, including agriculture and tourism, in this and the wider location is unacceptable;
 - The impact upon the residents of this part of Ryedale will be intolerable; and
- The applicant, Third Energy Gas limited (Third Energy) currently holds 6 Petroleum Licenses and 1 Petroleum Appraisal License, granted by the Secretary of State in the Department of Energy and Climate Change (DECC). Under the Petroleum Licensing system, this permits the licence holder to ‘search and bore for and get petroleum within the licence boundary’ subject to the granting of planning permission in accordance with the Town and Country Planning Act 1990.

The applicant has thus applied for planning permission from North Yorkshire County Council (NYCC) as the Minerals Planning Authority (MPA) to hydraulically stimulate the various geological formations previously identified during the 2013 KM8 drilling operation - followed by the production of gas from one or more of these formations into the existing production facilities followed by the wellsite restoration.

The wellsite at Kirby Misperton is in fact located within Ryedale District Council (RDC) area, although in this capacity, RDC have no powers of determination, however, are consulted by the MPA as a statutory consultee, in order for their response to be taken into account when assessing the planning balance.

The applicant has, on many occasions, alluded to the fact that should gas be found in sufficient quantities at this location, further applications for planning permission will be sought to hydraulically fracture in other locations within Ryedale including: Nunnington, Stonegate, Brawby, Swinton, Hovingham, Slingsby, Terrington, Coulton. Indeed the Planning Statement supports this notion by stating at paragraph 3 that: “the applicant also holds a number of exploration licences.”

CPRENY are concerned that should the MPA be so minded as to grant planning permission for this application, the precedent will have been set stating clearly that Ryedale is open to Fracking and thus it will be very difficult for the MPA to refuse future applications.

CPRENY are gravely concerned that this unique part of North Yorkshire will be subject to numerous applications to search for and subsequently extract petroleum following the announcement of the 14th round of Petroleum Exploration and Development Licenses on 18th August which highlights the fact that a further 30-35 licenses will be awarded to companies in and around North Yorkshire - on top of the licenses already held by Third Energy.

CPRENY has further serious concerns that should this application be permitted, the countryside of North Yorkshire will become a series of wellsite's, with each 'block' or license area measuring 10km x 10km, each having the potential to hold between 10-50 well heads and associated infrastructure at each.

This really would have the cumulative effect of destroying one of England's most 'unspoilt' and natural landscapes, especially as it is still uncertain as to whether or not DECC will allow fracking to take place within Areas of Outstanding Natural Beauty (AONBs) or National Parks. Some of the areas granted licenses in North Yorkshire are within these supposedly highly protected designated areas.

For the purposes of clarity, CPRENY would like it to be known that they were not contacted by Third Energy as part of the pre-application consultation as stated in Table 3.1 of the Planning Statement. However, the charity has been made aware of some community consultation activities surrounding the potential planning application by its members. Since then, the charity has been awaiting the submission of an application for some time with the full intention of responding to the consultation request by the MPA at the appropriate time.

The following sections of this report outline CPRE North Yorkshire's objection to this application in full:

The Proposals are contrary to both national and local planning policies.

NATIONAL POLICY CONTEXT

The National Planning Practice Guidance (NPPG) published online in March 2014 by the Department for Communities and Local Government (DCLG) established the key regulators for hydrocarbon extraction stating which issues MPAs need to consider and which others are matters for other regulatory regimes. MPAs are to rely on the assessments of other regulatory bodies for such issues. The responsibilities for the MPA when considering planning applications are set out at paragraph ID 27-013-20140306 (March 14) although it is noted that not all of these will be relevant to every site.

The National Planning Policy Framework (NPPF) was published by DCLG in 2012 and set out the Government's planning policies for England and how they are expected to be applied. The NPPF is a material consideration which should be used to aid the determination of this planning application. Achieving sustainable development is the primary aim of the NPPF. For decision making this means that proposals should be approved when in accordance with the development plan without delay, or where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless:

“Any adverse impacts of doing so would significantly and demonstrably outweigh benefits, when assessed against the policies in this framework as a whole; or Specific policies in this framework indicate development should be restricted” (Para 14).

Section 38(6) of the Planning and Compulsory Purchase Act, 2004, and section 70(2) of the Town and Country Planning Act 1990 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for the area currently comprises the saved policies of the North Yorkshire Minerals Local Plan (1997) and the Ryedale Local Plan Strategy (2013) and saved elements of the Ryedale Local Plan (2002). Limited weight, should, at this stage be given to the emerging Minerals and Waste Joint Plan being prepared jointly by the City of York Council, the North York Moors National Park Authority and the North Yorkshire County Council due to the early stage in the plan making process. However, this document will eventually replace the saved policies of the existing Minerals Local Plan and it is possible to gain an insight in to the direction of policy indicated in the Issues and Options document (February 2014).

Hydraulic stimulation, or fracking, is a relatively new method of extracting shale gas in the UK, therefore, is not included specifically within previous policies. Although the saved policies of the Minerals Local Plan deal with mineral and gas extraction, 'fracking' is not mentioned, therefore paragraph 14 of the NPPF applies as the policies are silent on this subject.

The NPPF itself, does not specifically distinguish the practise of fracking from any other method of mineral extraction, however, the NPPG does state that policies within the NPPF should be used by the MPA to help determine their specific responsibilities (ID 27-012-20140306 March 2014). As this is such a relatively new technological practise to the UK, CPRE acknowledge the difficulties faced by the County Council in determining this application when there is not a specific planning policy regime in place for fracking.

Paragraph 142 of the NPPF acknowledges that minerals are a finite source and can only be worked where they are found. Paragraph 143 sets out a number of elements that Local Planning Authorities should incorporate into the production of Local Plans, including at bullet point 6 a list of environmental criteria which will be used to determine planning applications. Paragraph 144 follows on by stating what the Local Authority must be aware of when determining Minerals Planning Applications. It follows that just because a mineral is known to be found at a certain location this is not a prerequisite to the fact it must be extracted.

Paragraph 147 however, states that when planning for on-shore oil and gas (including unconventional hydrocarbons), Minerals Planning Authorities should: “clearly distinguish between the three phases of development (exploration, appraisal and production) and address constraints on production and processing within areas that are licensed for oil and gas exploration or production.”

CPRENY are of the opinion that this application should be the subject of 2 planning applications; one to explore and appraise the results and one for production (as discussed in below under policy 4/1b of the County Minerals Local Plan).

The nature of shale found so deep beneath the ground, is very different to that of natural gas which has been traditionally extracted in the UK. It is known that the seam exists and the applicant has applied to explore 5 wellsites, however, drilling may not be successful at all or even any of these 5 wellsites i.e. just because the gas is known to be there, does not mean it is able to be extracted from that particular site. Unfortunately, for the fracking industry, it is unable to discover this until the act of hydraulic stimulation actually takes place. Therefore the applicant may have to make a decision to either investigate alternative wells or to stimulate at a different location altogether. It is therefore premature to grant planning permission for production until this site has been explored and appraised in line with the NPPF requirements.

LOCAL POLICY CONTEXT

Whilst utilising the NPPF to determine this application, the MPA must also have due regard to related planning policies that form the Development Plan.
North Yorkshire County Minerals Local Plan

Policy 4/1 lists the criteria that the MPA must be satisfied with when determining an application for any mining operation where appropriate (*italics below illustrate the exact policy wording*):

The mineral deposit on the application site has been fully investigated - A well head has been present at Kirby Misperton since Taylor Woodrow Exploration gained panning consent in 1984 for gas extraction. It is acknowledged that in 2013 the Applicant developed and subsequently drilled two boreholes from the Kirby Misperton 1 extension known as KM8 - which is the site location.

The Applicant is now proposing to hydraulically stimulate and test the various geological formations previously identified during the 2013 KM8 drilling operation and subsequent analysis of the data which should identify whether there is sufficient shale gas to extract.

It is well known that the site has previously extracted most of the reserves of natural gas at the well site via previously approved methods therefore, it is essential that the MPA are satisfied that should Shale Gas be found, it is a viable option with regard to geological features, water protection measures and the impact on the environment and nearby communities rather than simply permitting this development as the Government are pushing the fracking agenda.

The siting and scale of the proposal is acceptable - The site, as previously mentioned is located at the Kirby Misperton A wellsite and is located adjacent to KM1 within the Parish of Kirby Misperton within the District of Ryedale and the Vale of Pickering.

The site is brownfield having previously been developed and explored. However, the scale of this development is to be questioned. The application has been described as a 'test frack' and has lead the public to believe that this test would be undertaken in a matter of weeks.

On reading the submitted application, it has become apparent that this application is for something much greater than what is associated with a 'test'. The application is described as consisting of 5 phases: the pre-stimulation workover (totalling 2 weeks); hydraulic fracture stimulation/well test (approximately 6 weeks); production test (90 days plus time to install high pressure flowline and temporary flowline pipe); production (9 years); restoration (6 weeks). The planning statement at paragraph 6.4 states that all 5 phases are to be complete within 10 years. This is a very different timescale to what has been understood by members of the public when a 'test frack' has been previously mentioned. The application is in fact for a test and production and CPRENY feel that this has not been adequately described and publicised which has led to CPRENY Members feeling misled by the applicants.

CPRENY are of the opinion that the ‘production’ phases and the previous’ pre-stimulation workover and stimulation /well test’ phases should form the basis of two separate planning applications.

It is premature to be granting planning permission for production, when the results of the well test have not as yet been determined. Should shale gas in acceptable quantities be found and considered to be a viable and safe option to extract this in commercial quantities, various monitoring regimes (including the 12 month monitoring of methane in groundwater under the Infrastructure Act 2015) need to be undertaken prior to commercial extraction to ensure water safety and public health in line with other consenting regimes. Stating that the entire operation covering 5 phases will be complete within 10 years, does not allow for this essential monitoring to be undertaken. **Public health and water safety is too large a concern for this important stage not to be adhered to as required.**

Alongside this, is the fact that the applicant has already acknowledged that should the application be successful and gas is extracted via this technique, any further hydraulic fracturing at the KMA wellsite (beyond the 5 zones that are being applied for in this application) “will be subject to a further planning application and subsequent consent from the MPA” (para 3.1 Planning Statement). CPRENY are of the opinion, having researched fracking activities both abroad and within the UK, that once this operation was developed, the applicant would not only seek to extend this site to have more wellheads on site, but also apply for new planning permissions in adjacent and surrounding areas. **10 years could easily turn into much longer for the residents of this area of North Yorkshire.**

The proposed method and programme of working would minimise the impact of the proposal - the timescales involved has already been mentioned above, however, it is vital to note that at a variety of times within the proposed 10 year period of the project, works will be undertaken 7 days per week and 24 hours per day. The pre-stimulation workover and elements of the fracture stimulation phases (although fracture itself will only take place for 5 hours during day time hours), the production test phase and production itself will all operate over 24 hour, 7 days per week periods.

It is only the final phase of restoration that is singled out as being 6 days per week and only between the hours of 7am-7pm on those days. It is the opinion of CPRENY that the period of proposed working is not appropriate in an area so close to residential properties and villages, alongside the negative effects this will have on the tourism industry. The site is close to several touring and static caravan parks as well as Bed and Breakfast tourist accommodation providers who all market themselves as being located within a traditionally rural and peaceful destination.

Landscaping and screening has been designed to effectively mitigate the impact of the proposal - the applicant is proposing in advance of the pre-stimulation workover and subsequent hydraulic fracture stimulation, to create a noise attenuation barrier at the wellsite.

On completion of the hydraulic fracture stimulation operation the noise attenuation barrier will be demobilised from the wellsite. Chapter 16 of the Environmental Statement (submitted alongside the planning application) describes the barrier as being: “made up of a series of 6m and 12m ISO shipping containers,

stacked 3 units high, on the west, north, east and part of the Kirby Misperton 1 wellsite extension. The overall height will be 8.7m” (para 16.8.1).

According to Table 6.1 of the Planning Statement there will in fact be 33 x 12m containers and 9 x 6m containers. The size and massing of this structure is surely not appropriate in such a predominantly open area of countryside.

Alongside the noise attenuation barrier for the initial 2 weeks, residents and visitors to the area will also be able to see a 37m high workover rig, there will be 4 portable lighting masts (8m high each) and potentially be subjected to the sight of additional security fencing around the perimeter of the site (2.7m in height).

Following this stage, for a duration of 6 weeks during the hydraulic fracture itself, members of the public will be able to clearly see (above the attenuation barrier) infrastructure on the site including: a 60m high mobile crane (fully extended at different timescales), coil tubing tower of 25m in height. There will also be 3 proppant silo's at 7m in height and the 4 portable lighting masts at 8m each. Following this phase, the noise barrier and infrastructure associated with the tests will be removed.

Whilst CPRENY acknowledge that the above infrastructure requirements are temporary in nature, it is also noted that the applicant is hoping to conduct most of the initial stages of phases of the project in autumn and winter periods.

Therefore CPRENY believe the negative impact on the landscape will be deemed more significant during this period as the majority of the trees in the area are deciduous and thus residents and visitors to the area will be able to see a colourful wall of containers and the height of the site infrastructure clearly (the site is only 700m away from the village of Kirby Misperton, and the nearest residential properties are 200m away, with caravan parks a mere 420m from the wellsite). **Not only is this visually intrusive to residents and visitors to the area in the immediate surroundings but will be a detrimental impact on views into and out of the surrounding area including existing visitor attractions like Flamingo Land Resort and the Howardian Hills AONB and North York Moors National Park.**

Once at the production stages, site infrastructure is deemed to be no higher than those already on site and therefore less visually intrusive. However, CPRENY are concerned that as the noise attenuation barrier is removed, visitors to the area, will potentially be subjected to increased noise levels than those currently experienced in an area which is largely known for agricultural use with a large number of visitors to the area seeking to walk or spend time in a peaceful location.

Other environmental and amenity safeguards would effectively mitigate the impact of the proposal - CPRENY are also concerned about the impact on air quality arising from dust and traffic emissions associated with an increase in movement of vehicles to the site and the impact of associated traffic noise as detailed above.

A peaceful and tranquil area can also be affected by moving objects including transportation. CPRENY would urge the County Council to consider traffic movements when determining the application. The Planning Statement helpfully

discusses within Chapter 6 the total number of vehicle movements associated with each phase of the development. 158 individual HGV movements are associated with the mobilisation and demobilisation of the noise barrier alone. These are estimated to be 4 movements per hour between the hours of 7am-7pm over a 4 day period. During the same period, there will be 30 individual HGV movements associated with creating and demobilising the workover rig and equipment. This does not include car and LGV movements associated with personnel on site. 188 HGV movements in the initial phase is not acceptable in such a quiet rural location on roads which were not designed for such heavy vehicles at such high frequencies.

During the fracture stimulation the applicant has indicated that the total number of individual HGV movements will be approximately 388, the majority of which will be associated with setting up and taking down of the equipment (up to 4 movements per hour). During the fracturing activity stage HGV movement is expected to be lower with some periodic HGV movement associated with delivering equipment and the removal of waste (potentially 8 movements per day). During the production test the applicant has estimated that there will be 1 HGV movement per 2-3 days (although it is not clear as to what this movement is for).

At production the applicant has not detailed any HGV vehicle movements within the Planning Statement and **CPRENY have not found detail within Planning Statement Appendix 18 - Waste Management Plan, to identify how waste water will be disposed of.** If this does require taking to an environment agency facility, no details of traffic routes or vehicular movements have been provided.

CPRENY are firmly of the opinion that the application should not be determined until this is known, as any additional pressure on the road system must be taken into account when determining the merits of the development.

The proposals and programme for restoration are acceptable and would allow a high standard of restoration to be achieved - CPRENY acknowledge the fact that a programme for restoration has been submitted the County Council and should the Planning Committee be so minded as to approve this application would like to see a condition requiring liaison with Natural England, the Environment Agency, the County Council and any other appropriate agency prior to the commencement of the plan to ensure the most suitable restoration plan for the area is delivered for the area. This should also mention that future owners of the site would need to enter into this agreement as a condition of sale, should Third Energy sell the site and relinquish any such responsibilities at a future date.

A high standard of aftercare and management of the land could be achieved - In a similar way to the above, CPRENY would hope to see a condition attached to any approval requiring the future owner of the site to enter into an agreement with the County Council with regard to a suitable plan and standard for aftercare and management of the land once the site has been restored.

The proposed transport links to move the mineral to market are acceptable - It is proposed by the applicant to transfer the gas to the surface and into existing production facilities from where it is transported via pipeline to the Knapton Generating Station for the subsequent generating of electricity. The site at Knapton is also in the ownership of Third Energy.

CPRENY are unsure as to whether there is sufficient storage on site for the shale gas, should the gas pipeline rupture which transfers the gas to Knapton? Although there are provisions for the gas to be transported via existing pipeline from the site, CPRENY have grave concerns regarding the impact the proposed level of transportation will have on the immediate location and wider countryside.

As discussed above, CPRENY are concerned that vehicular movements and a route to dispose of waste and waste water has not been discussed within the planning statement or appendices other than detailing a short route culminating with vehicles reaching the A169. This must be determined prior to making a recommendation.

Any cumulative impact on the local area resulting from the proposal is acceptable - CPRENY are not convinced that the applicant has identified all the relevant developments and associated infrastructures within the immediate location and the wider parts of North Yorkshire which would be effected by this development should it be given approval.

Within Chapter 7 of the Environmental Statement the applicants have considered Cumulative impacts. However, the applicants have only investigated the impact of the proposed development alongside other existing gas production facilities, the existing adjacent development of Flamingo Land and potential committed developments within a 5km radius of the KMA Wellsite.

With respect to considering the existing development at Flamingo Land Zoo and Theme Park, CPRENY are concerned about the impact of public safety with relation to seismic activity as well as the impact of vibration and potential leakages which may damage the air quality of the area on the animals which are housed there, many of which are endangered and of low worldwide population numbers (e.g. Tiger).

Seismic activity has occurred as a result of fracking practices both in the UK and abroad in areas which have not demonstrated a history of seismic events prior to the introduction of the adjacent fracking enterprises.

The applicant has detailed the faults found close to the KM8 site in Chapter 3 of Appendix 15 to the Planning Statement. Although the applicant has estimated that the hydraulic stimulation will not be able to reactive a fault (cause an earthquake), it must be borne in mind when determining the application, that this location is adjacent to North Yorkshires most popular tourist attraction of Flamingo Land which contains a number of rollercoasters and rides. The applicant cannot issue a 100% guarantee that there will not be a seismic event, as the fact remains there are no guarantees how the earth and geology in this location will respond to such activity so deep in the earth's strata at such quantities. It was predicted that a seismic event would 'not be likely' to occur as a result of fracking at Preese Hall and Hesketh Bank near Blackpool in 2012 but tremors were felt in Lancashire as a result of the activities when an event occurred. Nor can the applicant guarantee that vibration, to the level predicted in this application lasting 9 years (and potentially more should extensions to this site or further applications for hydraulic stimulation elsewhere in the vicinity be sought), will not endanger the life of people or animals at Flamingo Land.

CPRENY firmly believes that this application should not be granted at this location given its proximity to Flamingo Land, when there can be no guarantees that a seismic event will not occur and people's lives endangered.

CPRENY are also concerned about the impact this proposal will have on the road network in combination with other development schemes which have recently been granted consent for example the Potash Mine on the North York Moors National Park.

Should this development go ahead and the applicants wish to transport waste produce along the A169 to an Environment Agency facility in Teesside, the applicant and County Council as Highway Authority will need to undertake additional modelling work to ensure the road capacity is sufficient and that safety and intimidation levels are minimal given the number of movements the potash mine will induce alongside the additional movements by HGVs related to this proposal. A management Plan may also be needed to ensure travel times are developed which will cause least impact on the users of the A169 during peak visitor seasons and for the residents of the National Park.

Policy 4/10 of the Minerals Local Plan deals with water protection stating that: "proposals for minerals operations and associated depositing of mineral waste will only be permitted where they would not have an unacceptable impact on surface or groundwater resources."

The proposals at the KM8 wellsite is at a location which is considered by the Environment Agency to be in Flood Zone 1 (annual flood probability of less than 0.1%) and the proposed development is considered appropriate for this flood zone. The applicants have illustrated the likely significant effects which could occur prior to mitigation at the KM8 wellsite with regard to water in Chapter 22.7.1, Appendix 22 of the Environmental Statement. These include for pre-stimulation workover, hydraulic fracture stimulation/well test, and production test and production phases:

"Spillage and discharge to surface water or infiltration through the base of the wellsite;

Loss of well integrity to leakage; and
Migration of hydraulic fracture fluids along natural faults and/or induced fractures."

And for the restoration phase:

"inadequate isolation of permeable zones, poor decommissioning and loss of well integrity leading to leakage; and
Leaching and/or spillage and infiltration."

Although it is noted that the additives to the hydraulic fracture fluids are classified as non-hazardous, CPRENY are concerned that should any of the above occur there will be damage caused to surrounding land which is used for arable purposes and also to the surrounding ecosystems which support flora and fauna in the area, including those within local Becks, Streams and the Rivers in the locality.

CPRENY is also concerned that any leakages may enter the water supply which directly feeds the Scarborough aquifer and thus impact on public health.

The County Council should ensure that all the required monitoring regimes have been complied with and sufficient mitigation has been incorporated into the design to ensure that damage cannot occur should they be so minded as to approve this application. Similarly, the Council need to be satisfied that the storage of water on site is of a suitable standard to ensure spillages and leakage does not occur.

Policy 4/14 states that: “proposals for mining operations and the associated depositing of mineral waste will be permitted only where there would not be an unacceptable impact on the local environment or residential amenity”. Whilst acknowledging that this site would be categorised as brownfield land as it has already been developed for gas extraction, this type of procedure is entirely different to what has occurred in the past at the site. The re-injection of the wells at 5 locations within the site will bring entirely different impacts to those currently experienced by the local population and the environment surrounding the site. **The nearest residential property is only 210 metres from the site**, another is 300m from the site and there are 2 caravan parks located at 420m and 750m respectively from the site boundary. The village of Kirby Misperton is 700m away from the site.

The Planning Statement states (alongside the environmental statement) that the erection of the shipping container noise attenuation barrier will be: “based on a worst case scenario” Chapter 6.1.1 (page 38). CPRENY are concerned that should this be the case, the residents will be subjected to not only the noise and vibration associated with the movement of 158 HGV and Crane movements transporting the containers to and from the site as well as the unsightly form of the barrier which will not sit well within the existing landscape (even during the temporary period). However, Chapter 16 of the Environmental Statement does not offer an alternative mitigation method other than a ‘with/without barrier’ scenario in order to understand what the impact will be on the residents or environment should a best case scenario be provided (or a scenario in between).

Without this information, CPRENY do not feel the County Council should determine the application at this stage, as it is essential to understand all of the noise implications which would be associated with the development without the barrier. CPRENY would ask the County Council to ensure consideration of all alternative options for mitigation measures should the Council be so minded as to approve this application.

Policy 4/15 deals specifically with Public Rights of Way (PROW). PROW number 25.53/4/1 was diverted in 2013 allowing for the construction of the Kirby Misperton 1 wellsite extension which means that the PROW does not traverse through the site, although PROW 25.53/5/2 traverses a section of the existing access road used by the Applicant to access both the Kirby Misperton A and B wellsites.

It has not been proposed to divert the existing PROWs as a result of the proposed development, however, CPRENY are very concerned about the safe ability of users to access this PROW due to the high volume of estimated traffic movements, especially during the mobilisation and demobilisation of the hydraulic fracture and

well test phases when the volume of HGVs will be at its most prolific. Not only is safety an issue, but the enjoyment of the users of the PROW and the surrounding countryside is a consideration.

Ryedale is well known for its beautiful areas of peaceful countryside. Should this development be approved, visitors to this area and these PROWs in particular will be subjected to vibration, dust, and the sight of the increased infrastructure levels on the site, including potentially the noise attenuation barrier, large scale high machinery, increased lighting in an area which has been traditionally dark and the noise associated with the development.

CPRE is of the opinion that this development, should it be approved, will prevent people from visiting Ryedale which relies heavily on the tourism industry.

Policy 7/7 specifically relates to the development of new reserves and states that: "Unless such development would be technically impracticable or environmentally unacceptable, planning permission for the development of oil and gas reserves as yet undiscovered will only be granted where the development utilises existing available surface infrastructure or pipelines". CPRENY have already acknowledged that this is a brownfield site, therefore the proposals would satisfy part of this policy.

However, CPRENY are of the opinion that there are too many unknowns about the practise of hydraulic fracturing in general and the impact it has on the surrounding environment and too many uncertainties in relation to this application that the applicant has not proved satisfactorily that the development would be environmentally acceptable, for all of the reasons already mentioned.

Therefore, CPRE are of the opinion that this proposal should be refused.

There are many well documented cases from the USA, Australia and New Zealand as to how fracking has damaged the local environment and impacted upon public health. The ChemTrust has produced a report entitled Fracking Pollution: How toxic chemicals from Fracking could affect wildlife and people in the UK and EU, published June 2015 which details some of these issues (www.chemtrust.org.uk/frackingreport).

Policy 7/10 details the requirements for restoration. As mentioned above under policy 4/1(f), CPRENY would urge the County Council to ensure a high level of liaison occurs with the relevant statutory and non-statutory bodies is required in order to achieve a high level of restoration should the Council be so minded as to approve this application. This should also be conditioned to extend to any new owners of the site should the development or site be sold at a later stage.

The North Yorkshire Minerals and Waste Joint Plan - Issues and Options

The emerging Minerals and Waste Joint Plan was published for public consultation in February 2014, and due to its early stage within the planning process, limited weight can be attributed to it. However, it is possible to see from the nature of the proposed issues, that new gas production facilities (id 26) will be supported where the site has been selected to minimise the adverse impacts on the environment, amenity and public safety and transport considerations.

It is evident that the new document will take forward some of the key environmental and residential protection themed found in the existing Minerals Local Plan and supported by the NPPF. Therefore CPRENY's opinions with regard to the impacts upon the residential community and the local environment would be supported in principle.

In a similar way, id 28 introduces the principle of development of shale gas resources emphasising the requirement for robust assessment of the potential impacts on a range of matters including: geological integrity, hydrogeological resources and processes, water resources, local amenity and public safety.

CPRENY would state again that the determination of the application for the production and restoration phases of this development are premature. The County Council cannot accurately assess the robustness of the applicant's submissions until the results of full monitoring works and subsequent well test have taken place. It is therefore CPRENY's opinion that this should form the basis of 2 applications.

The Ryedale Local Plan Strategy (2013)

The Ryedale Local Plan Strategy (LPS) sets out a long-term vision, objectives and strategy to guide public and private sector investment until 2027 for Ryedale. The vision states that by 2027 the countryside will be: "an attractive, productive and multi-functional resources. Traditional activities such as food production, tourism, recreation and leisure will be accompanied by wider roles for flood storage and prevention and appropriate new forms of energy production."

The aims of the plan follow the vision. Aim 1 is to: "To create opportunities to retain and create jobs, skills and prosperity and to develop a diverse and resilient economy that supports an ability to live and work in Ryedale". The planning application documents states that only 1 extra job will be created than those already in existence during the operation.

The applicant has assumed support for his application through the provisions of Policy SP9 relating specifically to: "Appropriate farm and rural diversification activity including innovative approaches" and "Appropriate new uses for land including flood management and energy production related research and education in this field".

However, CPRENY would argue that firstly, 'rural diversification' is typically related to farm or agricultural diversification which usually extends to some form of traditional skill for example such enterprises as dry stone walling, milling, wood turning and even tourist accommodation provision rather than a mining operation which happens to be in a rural location.

CPRENY would also argue that this application is specifically for the extraction of shale gas and its transference to Knapton Generating Station via underground pipeline where it will then be converted into electricity and sold to the National Grid, it will not provide energy for the local residents and communities. This is not an application for a research or educational facility.

Therefore, CPRE do not believe that this application is in conformity with Policy SP9.

Section 7 of the LPS relates specifically to landscape. The Key Diagram details the site as being within an area of Landscape of Local Value. Whilst it is recognised that the site location is not within land designated for its importance to nature or within land designated as National Park or as an Area of Outstanding Natural Beauty (AONB), it is important to note that CPRE are campaigning nationally for the protection of the 'ordinary undesignated countryside' as it makes up 55% of England's land (CPRE report, 2011). This land is often valued by many people who live adjacent to it, have employment on it or use it for a recreational use. Within the core planning principles listed in the NPPF it is stated that planning should 'recognise the intrinsic character and beauty of the countryside...' and should 'contribute to conserving and enhancing the natural environment...' (para17). Such aesthetic qualities as rural vistas and typical agricultural views are worthy of protecting and help instil a feeling of peace and tranquillity. This area of the Vale of Pickering is of local landscape value which is evident by the number of objections noted to date that have been submitted to the Planning Authority.

Policy SP13 deals with landscape matters. Under 'Landscape Character' the policy provides: "Development proposals should contribute to the protection and enhancement of distinctive elements of landscape character that are the result of historical and cultural influences, natural features and aesthetic qualities including:

- The distribution and form of settlements and buildings in their landscape setting;
- The character of individual settlements, including building styles and materials;
- The pattern and presence of distinctive landscape features and natural elements (including field boundaries, woodland, habitat types landforms, topography and watercourses);
- Visually sensitive skylines, hill and valley sides; and
- The ambience of the area, including nocturnal character, level and type of activity and tranquillity, sense of enclosure/exposure."

This particular location is visually distinctive by its generally gently undulating landforms, abundance of watercourses and wooded areas interspersed with hedgerow field boundaries and rural arable views with hilltop settlements including Kirby Misperton. At present, there are no nocturnal activities in the area and low level lighting which contributes to a sense of tranquillity and dark skies. This application would ensure night time operations occurred daily for a period of 10 years, introduce a significant level of lighting to a particularly dark rural area and significantly impact upon both residents and visitors to the area sense of peace and tranquillity.

Under 'National Landscape Designations and Locally Valued Landscape' the policy states that for areas outside of those landscapes protected by national landscapes designations, the Council will carefully consider the impact of development proposals on the broad areas of landscape which are valued locally including the Vale of Pickering. It goes on to state: "The Vale of Pickering, the Wolds and the Fringe of the Moors are of significant historic landscape value and loss or degradation of the elements that are integral to their historic landscape character make these landscapes particularly sensitive to change."

CPRENY are concerned that should this development go ahead, it will be very difficult for the County Council to resist further fracking activities in nearby parts of the Vale of Pickering and Ryedale and extensions to this site which will cumulatively have the effect of degrading the landscapes of this area of North Yorkshire.

Although this area is not nationally designated for its landscape features the site is located between 2 very sensitive areas of landscape: The Howardian Hills AONB and the North York Moors National Park. It is important that should the Council be so minded as to approve this application, the County Council are satisfied that the setting of these important areas are not affected by this proposal or indeed a series of proposals as the applicant has stated his intentions on many occasions. Views into and out of both the AONB and the National Park should be protected in order to preserve the special areas for generations to enjoy. Other landscape concerns have been discussed above under Policy 4/1(d) of the County Minerals Local Plan.

We would draw your attention to:

Case study from Natural England Publication 'England's statutory landscape designations: a practical guide to your duty of regard (NE243)

Development that takes place outside the National Park boundaries can still have the potential to impact upon the special qualities of National Parks, particularly on landscape quality and tranquility.

Policy SP14 deals with biodiversity. The development proposals are such that the development will take place within the existing footprint of the KMA wellsite, therefore no additional land take is required. The existing earth bunds and planting that took place in 2013 will be retained. However, due to the fact that the planting took place recently, maturity has not as yet been reached. The applicant has proposed to undertake some further infill planting but this will also take some years to mature.

CPRENY are concerned that the vibration and dust created by the development may not allow this planting to mature. Therefore, in line with Policy SP14 there will not be a net gain in biodiversity should this development to take place.

CPRENY would urge the County Council to ensure that all necessary habitat and species surveys have been fully undertake and investigated to the appropriate time scales by the applicant in order to fully understand and minimise the impact of the development on existing species of flora and fauna in the area including bats and roosting birds should the application be approved.

Policy SP17 deals specifically with managing Air Quality, Land and Water Resources. The policy states that: "water resources will be managed by:

...ensuring applications for new development assess impacts on water quality and propose mitigation measures to reduce the risk of pollution and a deterioration of water quality;

Protecting surface and groundwater from potentially polluting development and activity Sources of groundwater protection within and adjacent to the District will be protected using the Source Protection Zones (SPZs) identified by the Environment Agency. Within SPZ1 the following types of development will not be permitted unless adequate safeguards against possible contamination can be agreed:

- Septic tanks, waste water treatment works, storage tanks containing hydrocarbons or any chemicals or underground storage tanks;
- Sustainable drainage systems with infiltration to ground;
- Oil pipelines;
- Storm water overflows and below ground attenuation tanks;
- Activities which involve the disposal of liquid waste to land;
- Graveyards and cemeteries;
- Other specific types of development identified within the Environment Agency's Groundwater Protection Policy ...”

The applicants have provided a Hydrogeological Risk Assessment and a Baseline Water Quality Management Plan as part of the Planning Statement submitted alongside the planning application.

The Planning Statement (Para 8.14) states that there will be an overall water requirement, including contingencies, of circa 4,000m³. In order to reduce the impact of traffic from the KM8 site, the applicant proposes to utilise his existing underground pipeline to Knapton Generating Station. Yorkshire Water has confirmed that these requirements will not have a significant effect on the existing or future supply needs for the area. Experience from the USA indicates that leakage of waste fluids from the drilling and fracking processes resulted in environmental damage (<http://euanmearns.com/what-is-the-real-cost-of-shale-gas/>).

Although it is unlikely that contamination will occur via the artificially created fractures in the rock, leaks can potentially occur through faulty well construction or from surface spillage of drilling and fracking related fluids. There is a risk that even if contaminated surface water does not directly impact drinking water supplies, it could affect human health indirectly through consumption of contaminated wildlife, livestock or agricultural products.

It is understood that the fracking fluids are considered to be ‘non-hazardous’ however, they do include biocides, surfactants, viscosity modifiers and emulsifiers that are found in a number of household toiletries.

CPRENY are concerned that any such leakages or spillages could have a hugely significant negative impact on the environmental ecosystems located in this area and potentially impact upon the water courses in the area which feed into the regionally important Scarborough aquifer as well as damage the livelihoods of farmers and land owners in the vicinity.

The policy goes on to state that: “Air quality will be protected and improved by:

Locating and managing development to reduce traffic congestion and air pollution and promote the use of alternative forms of travel to the private car;

Supporting measures to encourage non-car based means of travel or the use of low emission vehicles;

Reducing air quality emissions from buildings through renewable energy provision and sustainable building standards in line with Policy SP18;

Requiring development proposals within or adjoining the Malton Air Quality Management Area to demonstrate how effects on air quality will be mitigated and further human exposure to poor air quality reduced.

All development proposals within or near to the Air Quality Management Area which are likely to impact upon air quality; which are sensitive to poor air quality or which would conflict with any Air Quality Action Plan will be accompanied by an Air Quality Assessment;

Only permitting development if the individual or cumulative impact on air quality is acceptable and appropriate mitigation measures are secured.”

The applicant has submitted an independent Air Quality Impact Assessment in support of the planning application, shown at Appendix 6 of the Planning Statement.

The Assessment has considered all phases of the proposed development and assess the impacts against UK Air Quality Standards (AQS) set to protect public health.

The proposed development does not include the flaring of natural gas as it will be transported to the Knapton Generating Station instead. The impact on air quality has been assessed as being at its worst in the first two phases of the operation especially whilst the fracturing operation is undertaken.

CPRENY are concerned that the location of this development within such a rural area will impact upon the visitors, residents and workers of this area especially given the increased volume of traffic which will be present on the roads in the area should this application be approved. Dust and particles from the drilling process alongside traffic fumes will be considerable in such a relatively peaceful part of the countryside. It is not clear how this proposal is in conformity with Policy SP17 given it seeks to protect and improve air quality.

CPRENY also have concerns regarding to ‘blow-off all methane’ as a bi-product of this operation which is not environmental best practise and would wish the County Council to ensure that Environment Agency approved mitigation regimes are in place to prevent the escape of this potentially dangerous and odorous gas escaping into the atmosphere and settling on the immediate surroundings. Chapter 8 of the Planning Statement, deals with Greenhouse Gases and at 8.4 states that chapter 12 of the Environmental Statement considers the impact from greenhouse gases from all five phases of the proposed development, although the impact will be greatest during the first two phases, pre-stimulation workover and hydraulic fracture stimulation/well test.

The proposed development does not contemplate flaring of natural gas and therefore the greenhouse gasses assessment within the Environmental Statement has considered the impacts from vehicle and equipment emissions and fugitive emissions. It goes on to state:

“A baseline for greenhouse gases has been established using both contextual data and baseline air quality monitoring. The total greenhouse gas emissions emitted in 2013 from the energy supply sector was 189.7 MtCO₂ equivalent (189,700,000 tonnes), which has been used to determine the percentage equivalent for the proposed development. The expected release rate of greenhouse gases during the proposed development will be circa 1,680 tCO₂ equivalent with the maximum upper estimate of 2,602 tCO₂ equivalent. The maximum upper estimate equates to a percentage contribution of 0.0014% of the total UK greenhouse gas emissions from the energy supply sector in 2013.”

CPRENY would urge the Council to ensure that best practice is followed in all areas of the development should it be so minded as to approve this application and that the Air Quality Management Plan submitted by the applicant is updated to reflect this.

The applicant has stated that mitigation has been considered and deigned into the proposals, however the ‘blow off of methane’ in the quantities suggested is not best practise or considered to be environmentally friendly in such a rural and rich agriculture environment.

SUMMARY AND CONCLUSION

In summary, CPRENY do not believe that this application is in conformity with National or Local planning policies as set out above.

CPRENY are of the opinion that this application should form 2 separate applications for the different stages of the operation.

CPRENY would urge the County Council to ensure that the applicant has followed best practise and all the mandatory monitoring regimes required by the various regulators prior to the submission of this application, including the 12 month monitoring of methane in groundwater under the Infrastructure Act 2015.

The level of harm that will be inflicted on the landscape of the Ryedale countryside is unacceptable

As detailed above when dealing with the planning policy context, CPRENY is of the firm opinion that the landscape of this special part of Ryedale will be adversely impacted should this application be granted planning permission.

CPRENY acknowledges that the worst visual impact on the landscape will be during the first phases of the development, the pre-stimulation workover and hydraulic fracturing phases of the development, due to the height of the equipment proposed (37m high workover rig, and 25m high coil tubing tower). Part of the existing site is well screened by mature landscaping (the southern and part of the eastern boundaries). However, the remaining eastern and northern boundaries of the wellsite are still subject to the 2012 approved landscaping scheme for the KM1 extension and shrubs and trees were only planted in 2013 therefore are not mature and this part of the site would be extremely open. The Planning Statement at Chapter 8.5 states that: “the inclusion of an 8.7m high noise barrier will provide temporary visual mitigation”. It is not clear to CPRENY what visual (or indeed noise) mitigation would take place should the noise attenuation barrier not be installed as this has been described elsewhere as a ‘worst-case scenario’.

CPRENY would not wish the residents and visual receptors to be subjected to the noise or sight of the development should an alternative to the barrier not be brought forward. Although temporary in nature, the shipping container barrier would not sit well in the landscape, although it is recognised it may be of some benefit in relation to noise.

CPRENY are of the opinion that the harm to this part of the countryside for all the reasons listed above is such that the application should be refused.

The impact on the economy, including agriculture and tourism, in this and the wider location is unacceptable

Agriculture and tourism are the two predominant economic activities in Ryedale.

Chapter 5.2 of the Ryedale LPS states: “As a predominantly rural area, agriculture is a traditional sector of the economy across the District. Tourism has a strong presence particularly in northern Ryedale where it is centred on specific visitor

attractions". Although no agricultural land is to be lost to this development which will occur within the current footprint of the KMA wellsite,

CPRENY are concerned that spillages or leakages may occur which will impact upon the water courses and indirectly onto the surrounding land damaging crops and vital ecosystems as expressed within Section 1 of this report.

Similarly, CPRENY have concerns with how this development will impact upon the tourism industry which is particularly strong within this part of Ryedale. Flamingo Land Zoo and Theme Park is the most visited paid for attraction in North Yorkshire and also attracts visitors to its camping facilities. Other campsites and tourism providers also exist within close proximity to the site.

CPRENY are concerned that visitors to the area will not wish to return to Ryedale should the application be approved. The threat of increased volume of HGVs on minor country roads alongside, the predicted levels of noise, visual aesthetics, dust, vibrations all contribute to the reason people would not wish to return to an area previously visited for being a tranquil and typically rural location.

Destinations further afield in North Yorkshire could also be impacted upon by this application. The increased levels of transport on the larger roads such as the A169 or the A64, or the A170, depending on which Environment Agency facility the waste deposits and waste water are directed to all pass through main towns and villages which are not accustomed to such volume of large vehicles. Should the waste be transported to Teesside over the North York Moors National Park, the HGV numbers would be in addition to those associated with the recently approved Potash Mine, thus persuading people not to visit Whitby or locations within the National Park, therefore the economic threat to the area is large.

Should this application be approved and Third Energy and other Petroleum Extraction License Holders apply for permission to frack in other parts of Ryedale and North Yorkshire, the County Council should be aware that not all applicants will include the underground transportation of gas via an existing pipeline to a generating station nearby. The produce from these sites would need to be produced either on site which would mean that the potential threat of the flaring of gas would impact on the air quality of the area and introduce further light pollution or alternatively, be transported in more HGVs off site to a generating station elsewhere.

CPRENY Members are concerned that once one application for fracking is approved, it will be impossible to resist other applications in the area and that the area they have chosen to work and reside will lose its appeal.

CPRENY has real concerns regarding the precedent set should this application be approved. Given the future intentions of the applicant (who currently holds 6 licenses) and the number of licenses issued for North Yorkshire under the 14th Round of PEDL in August 2015 (30-35) it is assumed that the County Council will be determining a number of applications in the near future for this type of activity.

CPRENY would urge the County Council to consider all elements of the application and put strong emphasis on the protection of this special part of North Yorkshire so that it can be enjoyed for many generations to come.

The impact upon the residents of this part of Ryedale will be intolerable:

As stated throughout this letter, CPRENY have real concerns that the residents of this part of Ryedale will be severely impacted upon by the approval of this development proposal. Although the extraction of gas has occurred at this plant for 20 years, this operation and the procedures involved are entirely different to any that has occurred before and therefore the impacts of this type of extraction are as yet unknown.

The nearest residents are only 200m from the site with the village of Kirby Misperton a mere 700m away. The projected lifespan of the project is 10 years (although should an extension to the site or additional wells within the site be requested this could be extended beyond 10) with operations taking place on site 24 hours per day 7 days per week. Not only will the residents be subjected to noise in varying degrees throughout the operation, but lighting in an area which was previously dark, the visual qualities of the area will be degraded, air quality will be affected via traffic emissions and any dust associated with the drilling. The residents will also have to cope with the increased traffic numbers on very small rural lanes, alongside the intimidation factor from the volume of HGVs. The local roads are already inadequate, with large visible potholes at the sides of the roads, prior to damage done by the vibration of the level of predicted traffic imposed by the development. They will also live in fear of seismic events and leakages to local water supplies. Many of the residents in the area also work in the tourism or outdoor recreation industries, therefore their livelihoods will be affected by the fact people do not wish to visit an area where fracking takes place. This was illustrated recently by a poll taken in the Yorkshire Post indicating that 88% of people were against fracking and a recent DECC Poll on Public Attitudes showing that support for Fracking was at an all-time low - only 21%. (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/450674/PAT_Summary_Wave_14.pdf)

The Planning Statement and associated documents refer repeatedly to the temporary nature of this proposal. 10 years is a very long 'temporary' time period for the residents to be subjected to such impacts and also for the area in terms of economic prosperity should visitors be deterred from the area.

Many members are also concerned about the impact fracking will have on house prices which will affect the residents and the economy in this area of North Yorkshire - especially should a number of fracking sites be developed in a relatively small area.

(<http://www.telegraph.co.uk/finance/property/house-prices/11576180/Fracking-could-wipe-tens-of-thousands-of-pounds-off-house-prices.html>).

It is also worthy of note that many of the old stone houses in the area are not built on foundations. Members in the area who have had work done on their houses have reported that building contractors have reported that the houses are not "stood on anything" therefore would not stand firm should seismic events occur. This local knowledge adds to the stress that local residents and members of CPRENY face will face daily should the application be approved.

CONCLUSIONS

As stated at the beginning of this report, CPRENY is of the opinion that the granting of the production stage of this planning application is premature given that the company do not even know whether or not they can access the gas in the Bowland Shale seam or not as yet.

It is CPRENY's view that this application should form the basis of 2 separate planning applications; one for the pre-production phase and one for the production and restoration phases.

CPRENY believe this application is contrary to local and national planning policy and would inflict significant negative impacts and stress upon the landscape, residents and the economy of this part of Ryedale and the wider location.

CPRENY believe that the traffic implications of the proposal (with or without the noise barrier) are such that the minor roads would not cope with the volume and size of HGVs required for the duration of the operation and that the traffic implication for the larger A-roads would also cause disruption for the settlements and communities who utilise them, especially during peak tourist season.

There are multiple unknowns regarding this technology which is still in its relative infancy within the UK. Experience elsewhere in the world suggests that the practise of fracking can cause detrimental effects to the environment, particularly the water supply and air quality all of which impact on the standard of human health. North Yorkshire is renowned for its tranquillity and beautiful rural vistas. Indeed many people move to or visit the area specifically to experience this. Should fracking be permitted within North Yorkshire to the extent at which it may, given the number of licenses to be delivered by DECC, this area will be significantly altered and its sense of remoteness lost forever.

CPRE nationally are campaigning for the Government to investigate how the nation can generate and conserve energy by considering how we could address issues of poor existing housing stock, for example, increased insulation, micro wind turbines on roof tops, solar schemes, CHPs etc. CPRE also believe that investing money in the thorough investigation of alternative renewables rather than continuing a reliance on fossil fuels is the appropriate way forward for the Government to be addressing the issue of Climate Change.

It is increasingly apparent that throughout the Ryedale District and North Yorkshire as a whole, there is significant amount of opposition to fracking as evidenced by the sheer volume of anti-fracking posters, stickers and signs throughout the area displayed on road verges, in community facilities, on notice boards, in windows of private residences and in business windows.

CPRENY would urge the Planning Committee to take note of these and to support their electorate by refusing planning permission for this highly controversial and emotive practise and to encourage Government to investigate much more

environmentally friendly ways to reduce Climate Change and produce electricity such as investing in more efficient forms of renewable energy.

CPRENY trusts that the information provided in this letter is enough to register the full objection made by North Yorkshire Branch of the Campaign to Protect Rural England to the proposals for hydraulic stimulation at the site known as KM8, at KMA Wellsite, Kirby Misperton.

response to NYCC with regard to application
NY/2015/0233/ENV
research and report prepared by Katie Atkinson
of KVA Planning Consultancy for
the Campaign to Protect Rural England North Yorkshire
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