



**TOWN AND COUNTRY PLANNING ACT 1990**

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**Planning Inspectorate Reference: APP/W9500/A/11/2155352/NWF**

**North York Moors National Park Authority Reference: NYM/2010/0262/EIA**

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**Appeal by: Moorland Energy Limited**  
**Location: Ebberston Well Site, Givendale Head Farm, Ebberston**  
**Proposal: Gas production from existing well site and provision of a local equipment room together with construction of 2 no underground pipelines as part of the pipework link to a proposed gas processing facility near Thornton le Dale**  
**Start Date: 1<sup>st</sup> April 2011**

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**Statement of Case by the North York Moors National Park Authority as Local Planning Authority under Rule 6 of the Inquiries Procedure Rules**

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## **1.0 Introduction**

- 1.1 This planning inquiry concerns a planning application incorporating gas production, alterations and the provision of new facilities at Ebberston Well site; the construction of two underground gas pipelines from the Ebberston Well site to a proposed gas processing facility to be located off Hurrell Lane, Thornton le Dale; the provision of a new vehicular access road between the A170 and the proposed gas processing facility; and the construction of a gas processing plant to include buildings, plant, and other associated works and infrastructure, the construction of an export pipeline between Hurrell Lane to a proposed National Transmission System - Above Ground Installation on land to be located to the south of New Ings Drain, off Hurrell Lane, Thornton le Dale
- 1.2 The planning application was received and validated by the North York Moors National Park Authority on 1<sup>st</sup> April 2010 and following the appeal by the applicants against non-determination has been recovered by the Secretary of State for his decision.
- 1.3 The North York Moors National Park Authority is the Local Planning Authority (LPA) for the North York Moors National Park. North Yorkshire County Council is the Local Minerals Planning Authority responsible for the adjoining area. The elements of the proposal located within the National Park are the well site and 650 metres of the pipeline. The proposed Gas Processing Plant, Above Ground Installation and new access road are located outside of the National Park.
- 1.4 A report on the proposed development will be considered by the North York Moors National Park Planning Committee on 15<sup>th</sup> September 2011 which proposes a recommendation to the Secretary of State that the proposal is refused. However this Statement of Case is subject to Members' views and if these prove to be different the Secretary of State will be informed immediately.
- 1.5 Members of the North York Moors National Park Authority's Planning Committee provided formal comments to the element of the proposal which falls outside the National Park to North Yorkshire County Council in July 2011 as part of the formal consultation process.

## **2.0 Statement of Common Ground**

2.1 The Local Planning Authority along with the Minerals Planning Authority will seek to agree with the Appellants as much relevant information as is reasonably possible in a Statement of Common Ground. This is still awaited at present but will be submitted in due course.

## **3.0 Policy**

3.1 Reference will be made to the following policies

- North York Moors Core Strategy and Development Policies adopted November 2008 – Core Policy A, Core Policy E and Development Policy 1.
- Minerals Policy Statement 1 ‘Planning and Minerals’ (2006)
- Planning Policy Statement 7 ‘Sustainable Development in Rural Areas’.
- Planning Policy Statement 22 ‘Renewable Energy’.
- Planning Policy Guidance 24 ‘Noise’.
- The Yorkshire and Humber Plan – Regional Spatial Strategy to 2026.
- The North Yorkshire Minerals Local Plan adopted 1997 – 7/6, 7/7.
- National Planning Policy Statement for Energy Infrastructure (designated July 2011) – overarching EN-1 and gas supply infrastructure and gas and oil pipelines EN-4.
- National Planning Policy Framework – consultation draft published July 2011.
- English National Park and the Broads UK Government Vision and Circular 2010.

## **4.0 Planning History**

4.1 Natural gas was first discovered lying in the geology of North Yorkshire in the 1940’s. Planning Permission was granted at the well site currently being considered in 2008 for the drilling and siting of a temporary borehole and access for exploration, testing and evaluation of hydrocarbons. It was noted in the Committee Report for this application that granting this consent would not be any indication of the possible decision should an application for production be submitted. In December 2010 permission was granted to allow the retention of the well site for a further two years.

## **5.0 Local Planning Authority Statement of Case**

5.1 This Statement of Case concerns the particulars of the case which the Local Planning Authority proposes to put forward at the inquiry. It relates to two main areas:

1. The impact on the Local Landscape and the setting of the North York Moors National Park and;
2. The proposed development fails to meet the requirements of the Major Development Test as set out in paragraph 14, Minerals Planning Statement 1.

5.2 The LPA will put forward evidence to show that although the proposed Gas Processing Plant is located on a site 10 metres away from the boundary of the National Park it will have a significantly adverse impact on the landscape of the North York Moors and its special qualities of dark skies at night and tranquility. The Local Planning Authority will put forward evidence to counter the Applicant's arguments that the location of the site and the proposed screening will result in no harm to the local landscape or the North York Moors National Park.

5.3 Although it is recognised that there is an overall need to exploit viable gas reserves, the LPA will demonstrate that the adverse impact the proposed industrial development will have on the setting of the North York Moors National Park will be so great that the proposal fails to meet the requirements of the Major Development Test set out in paragraph 14, Minerals Planning Statement 1.

5.4 The National Park Authority will rely on evidence given by North Yorkshire County Council on other matters to support its putative Reasons for Refusal which are:

1. The applicants have failed to robustly demonstrate that there is significant national need for the gas resources which would outweigh the harm that will be caused to this part of the National Park by the development and is therefore contrary to the Major Development Test set out in paragraph 14, Minerals Policy Statement 1, Core Policy E and the draft National Planning Policy Framework.
2. The applicants have failed to demonstrate that there is a sufficient level of gas resources in the area to justify the construction of a Gas Processing Plant within close proximity to

the National Park, which will set a precedent and create perhaps irresistible pressure for a number of further well sites within the National Park in as yet unknown locations, which might have a harmful impact on it's character and special qualities and conflicts with Core Policy A.

3. The applicants have not provided robust evidence to satisfy the National Park Authority that there will be no safety risks, noise or light emissions from the development, which may adversely impact the residential amenity of nearby residents living in the North York Moors and is therefore contrary to Development Policy 1.
4. The proposed Gas Processing Plant will cause significant visual harm to the setting and special qualities including dark skies at night and tranquillity of the North York Moors National Park within the wider landscape when looking from the south and thereby conflicts with Core Policy A, the English National Parks and the Broads Circular 2010 and policies 7/6 and 7/7 of the North Yorkshire Minerals Local Plan.
5. It has not been sufficiently demonstrated by the applicant that an alternative site for the proposal could not be both technically and environmentally acceptable as required by paragraph 14, Minerals Policy Statement 1 and Policy 7/7 of the North Yorkshire Minerals Local Plan.
6. The applicant has not provided sufficient information with regard to restoration of the land, either post operational life or in the event of abandonment, to satisfy the Authority that a suitable restoration of the site can be achieved or secured, which conflicts with Core Policy A.

## **6.0 Documents to be Referred to**

- 6.1 A Core Document List has been compiled and circulated to all parties and the current draft is attached at Annex A.
- 6.2 The Local Planning Authority reserves the right to refer to other documentation as may be necessary in the development of a Proof of Evidence and in giving evidence at the Inquiry.
- 6.3 Once the Proof of Evidence is prepared then such documents as are referred to will be available for inspection by prior arrangement at the National Park Headquarters, The Old Vicarage, Bondgate, Helmsley, North Yorkshire, YO63 5BP. Electronic versions of all

documents relating to the Inquiry will be made available on the website of North Yorkshire County Council at:

<https://onlineplanningregister.northyorks.gov.uk/Online%20Register/PlanAppDisp.asp?RecNum=7365>

## **7.0 Proposed Conditions**

- 7.1 If the Secretary of State is minded to approve the proposal, the LPA would respectfully request that a number of conditions are attached. The LPA is currently drafting a list of proposed conditions with North Yorkshire County Council, which will be submitted to the Secretary of State as soon as possible.

Caroline Skelly BA Hons, MSc, MA, MRTPI  
Planning Policy Officer  
On behalf of the North York Moors National Park  
Authority  
September 2011

## **Annex A**

**RYEDALE GAS INQUIRY: CORE DOCUMENTS LIST as at 2 September 2011**

**APP/W9500/A/11/2155352**

**APP/P2745/A/11/2155358**

**SECTION A**

## **GOVERNMENT DOCUMENTS, LEGISLATION AND NATIONAL GUIDANCE**

- A1 Draft National Planning Policy Framework (July 2011)
- A2 PINS Guidance to Inspectors on draft NPPF
- A3 EN1 National Policy Statement for Energy (July 2011)
- A4 EN4 National Policy Statement for Oil and Gas (July 2011)
- A5 MPS1 – Planning and Minerals (November 2006)
- A6 MPS2 - Controlling and mitigating the environmental effects of mineral extraction in England (March 2005)
- A7 PPS1 – Delivering Sustainable Development (January 2005)
- A8 PPS1 Planning and Climate Change - Supplement to Planning Policy Statement 1 (December 2007)
- A9 PPS4 – Planning for Sustainable Economic Growth (December 2009)
- A10 PPS5 – Planning for the Historic Environment (March 2010)
- A11 PPS7 – Sustainable Development in Rural Areas (August 2004)
- A12 PPS9 – Biodiversity and Geological Conservation (August 2005)
- A13 PPG13 – Transport (April 2001)
- A14 PPS23 – Planning and Pollution Control (November 2004)
- A15 PPG24 – Planning & Noise (October 1994)
- A16 PPS25 – Development and Flood Risk (March 2010)
- A17 PPS25 Companion Guide - Development and Flood Risk - Practice Guide (December 2009)
- A18 Ministerial Energy Need Statement 16 May 2006
- A19 Energy White Paper 2003
- A20 Energy White Paper 2007
- A21 Circular 11/95 - The use of Conditions in Planning Permissions
- A22 Circular 04/00 – Planning Controls for Hazardous Substances
- A23 Circular 05/05 – Planning Obligations
- A24 Circular 06/05 - Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System
- A25 Circular 03/09 - Costs Awards in Appeals and Other Planning Proceedings
- A26 English National Parks and the Broads – Vision and Circular 2010
- A27 Natural England Character Assessment (areas 25 and 26)
- A28 ILP Guidance notes for the reduction of obtrusive light

- A29 CIE 150:2003 Guide on the limitation of the effects of obtrusive light from outdoor lighting installations
- A30 DEFRA Odour Guidance for Local Authorities, March 2010
- A31 Technical Guidance Note H4 – Odour Management, Environment Agency 2011
- A32 Gasification, Liquefaction and Refining Installations (EPR 1.02) Sector Guidance Environment Agency 2009
- A33 Energy and Emissions Projections, Annex C Final Energy Demand, DECC 2011
- A34 Planning (Hazardous Substances) Regulations 1992
- A35 SI/1999/743: The Control of Major Accident Hazards Regulations 1999
- A36 SI/2005/1088: The Control of Major Accident Hazards (Amendment) Regulations 2005
- A37 IUCLID Data Sheet for Natural Gas Condensate (CAS No. 68919-39-1)
- A38 Offshore Installations and Wells (Design and Construction &c.) Regulations 1996
- A39 Borehole Sites and Operations Regulations 1995
- A40 Pipeline Safety Regulations 1996
- A41 DECC Gas Security of Supply April 2010
- A42 Gas Transportation Ten Year Statement 2009

## **SECTION B**

### **REGIONAL DOCUMENTS**

- B1 Regional Spatial Strategy for Yorkshire & the Humber 2008
- B2 GOYH Regional Energy Strategy 2005

## **SECTION C**

### **NORTH YORKSHIRE COUNTY COUNCIL DOCUMENTS**

- C1 NY Minerals Local Plan 1997 (Saved Policies)
- C2 GOYH Saved Policies Direction dated 17 September 2007

## **SECTION D**

### **NORTH YORK MOORS NATIONAL PARK AUTHORITY DOCUMENTS**

- D1 Core Strategy & Development Policies 2008
- D2 National Park Management Plan 1998
- D3 Review of NPMP 2004
- D4 NYM Design Guide Part 3: Trees & Landscape



D5 NYMNP Landscape Character Assessment – White Young Green, 2003

## **SECTION E**

### **RYEDALE DISTRICT COUNCIL DOCUMENTS**

- E1 Ryedale Local Plan 2002 (Saved Policies)
- E2 latest version Ryedale draft Core Strategy
- E3 Ryedale Saved Policies Direction dated 17 September 2007

## **SECTION F**

### **RELEVANT PLANNING HISTORY**

- F1 NYM/2007/0901 application documents
- F2 Decision letter NYM/2007/0901
- F3 Decision letter NYM/2010/0871/FL
- F4 Secretary of State's decision letter on East Knapton 1992
- F5 Inspector's Report on above

## **SECTION G**

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- G1 Screening opinion NYCC – See Appendix 2.1 of Environmental Statement
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- Chapter 1 Introduction
- Chapter 2 Environmental Impact Assessment Methodology
- Chapter 3 Sites and Surroundings
- Chapter 4 Project Description
- Chapter 5 Alternative Sites & Processes
- Chapter 6 Construction Programme
- Chapter 7 Ecology
- Chapter 8 Landscape and Visual Impact
- Chapter 9 Air Quality

Chapter 10 Noise and Vibration  
Chapter 11 Traffic and Transportation  
Chapter 12 Flood Risk, Hydrology and Drainage  
Chapter 13 Archaeology and Cultural Heritage  
Chapter 14 Lighting  
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- H10 Addendum to Chapter 5 Environmental Statement
- H11 Submission to NYMNPAA December 2010 on Alternative Wellsites
- H12 Response to Mike Convery, May 2011
- H13 Odour Management Plan, June 2011 (URS)
- H14 Exterior Lighting Report, 20 May 2011 (WSP)
- H15 Tourism and Economic Impact Assessment, 22 June 2010
- H16 Energy Contract Company Report, 5 July 2010
- H17 Estimate of Gas Production, 11 January 2011
- H18 Alternative Sites Revised Plan P72 rev D
- H19 Archaeology/Geophysical Survey, Peter Cardwell October 2010
- H20 Species Survey and Monitoring Issue 2, August 2010
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HLSC2	Northern Gas Networks
HLSC3	Transport & Development Unit
HLSC4	Natural England
HLSC5	Wilton Parish Council
HLSC6	Health and Safety Executive
HLSC7	Sara Robin, Yorkshire Wildlife Trust
HLSC8	Russ Varley, NYCC Public Rights of Way
HLSC9	John D. Farquhar (CPRE)
HLSC10	Mr R Myrshall, NYCC Head of Emergency Planning
HLSC11	Malcom Spittle, NYCC Principal Policy Officer
HLSC12	Lucie Hawkins, NYCC Development Control Archaeologist
HLSC13	Councillor M Gray, Allerston & Wilton Parish Council
HLSC14	English Heritage
HLSC15	John D. Farquhar (CPRE)
HLSC16	Mr M Blythe, Thornton le Dale Parish Council
HLSC17	Richard Clarke, Natural England
HLSC18	Richard Clarke, Natural England
HLSC19	Yorkshire Water Services
HLSC20	Julia Casterton, NYCC Ecology team
HLSC21	Environment Agency
HLSC22	Rob Smith, NYCC Plans and Technical Services
HLSC23	Jochen Werres, NYCC Funding, Strategy and Performance
HLSC24	Health and Safety Executive
HLSC25	English Heritage
HLSC26	Paul Roberts, Transport & Development Unit
HLSC27	Lucie Hawkins, NYCC Development Control Archaeologist
HLSC28	Yorkshire Water Services
HLSC29	Claire Storey, Natural England



HLSC30	Health and Safety Executive
HLSC31	Jonathon Kendell, Planning Liaison Officer, Environment Agency
HLSC32	Sara Robin, Yorkshire Wildlife Trust
HLSC33	Michael Young, NYCC Principal Ecologist
HLSC34	Thornton le Dale Parish Council
HLSC35	Lucie Hawkins, NYCC Development Control Archaeologist
HLSC36	English Heritage
HLSC37	Lucie Hawkins, NYCC Development Control Archaeologist
HLSC38	Malcolm Barnett, NYCC Principal Landscape Architect
HLSC39	North York Moors National Park Planning Committee
HLSC40	Ryedale District Council (Planning)
HLSC41	Richard Clarke, Natural England
HLSC42	Health and Safety Executive

<b>Ref No'</b>	<b>Name</b>
HLR1	Adam White
HLR2	Mr Simon Durkin
HLR3	W B & A M Midgley
HLR4	David Bartlett
HLR5	W B and A M Midgley
HLR6	Dr Michael Pitt
HLR7	Professor Gordon H Bell
HLR8	Mr T Kirkhope
HLR9	Mrs P Shirt
HLR10	J M Hahn
HLR11	John Tobin
HLR12	Mrs G Tobin
HLR13	Jane Russell
HLR14	Mrs S Hudson
HLR15	Mr T Watson
HLR16	Sebastian Drury
HLR17	Charlotte Price
HLR18	Mr N Moan
HLR19	Mr A Syson

HLR20	Mr & Mrs Brooke
HLR21	Mr & Mrs Patterson
HLR22	Jemma Grieveson
HLR23	F O'Daley
HLR24	Sir/Madam
HLR25	A Form
HLR26	Mr A J Booth
HLR27	Mr I T Turnbull
HLR28	Dr Michael Pitt
HLR29	Dr Michael Pitt
HLR30	Miss L Elizabeth
HLR31	Mr J L Gabbott
HLR32	Susan Harris
HLR33	Mr C J Coole
HLR34	Mr M Greenwood
HLR35	Mr J Mark
HLR36	Mr R James
HLR37	Andrew & Julie Davies
HLR38	Emily Harrison
HLR39	A Wells
HLR40	Alice Harrison
HLR41	Mrs B May
HLR42	M Wilcox
HLR43	J Thomas
HLR44	S Dove
HLR45	Dr David J Low
HLR46	Mrs M Weaver
HLR47	Stephen Reed
HLR48	Mr D Ludlow
HLR49	I Griffiths, F Spencer
HLR50	K Ramsey
HLR51	D & JC Smakman
HLR52	Jon Pearson
HLR53	K Metcalfe

HLR54	Amanda Jasper
HLR55	S Senner
HLR56	Clare Cassell
HLR57	Mr & Mrs Christmas
HLR58	Rachel Dembry
HLR59	Mr M P K Jones
HLR60	Miss F Elgar
HLR61	Miss Jane Watson
HLR62	Samantha Hood
HLR63	Steven Kerswill
HLR64	Mrs S Pearson
HLR65	Mr K Avison
HLR66	Mr & Mrs Heppleston
HLR67	A Roe
HLR68	Mrs V Wilson
HLR69	Mr & Mrs M Grute
HLR70	Mr G Toms
HLR71	P Cragg
HLR72	A Cragg
HLR73	I Jeffries
HLR74	Mrs M Taylor
HLR75	D Ackroyd
HLR76	Mr & Mrs Fordham
HLR77	Mr & Mrs M L Rendell
HLR78	Mrs E McDermott
HLR79	Mrs R Bage
HLR80	S Tunmore
HLR81	Mrs J Walker
HLR82	M J Armitage
HLR83	Mrs S Ackroyd
HLR84	W Bramley
HLR85	Mrs M Rhodes
HLR86	S Mathewson
HLR87	B M Cluxton

HLR88 Mr & Mrs Steadman  
HLR89 Veronica Hartley  
HLR90 Dr Michael Pitt  
HLR91 John & James Mercer  
HLR92 W B & A M Midgley  
HLR93 Mr M & Mrs J Read  
HLR94 Mrs J Carter  
HLR95 M Binns  
HLR96 Philippa Hetherington  
HLR97 E A Towell  
HLR98 C V Towell  
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HLR100 C and M Binns  
HLR101 Kathleen Smith  
HLR102 Mrs V Hoggath  
HLR103 Diane E Stenton  
HLR104 M Lietz  
HLR105 Mr Hardy  
HLR106 Christine Bates  
HLR107 Simon Wilkinson  
HLR108 Mr S Wilkinson  
HLR109 A Philips  
HLR110 Mrs B Philips  
HLR111 Mrs L Beecham  
HLR112 Mr T M Beecham  
HLR113 P M Procter  
HLR114 Mary Nesfield  
HLR115 Mrs M Parkin  
HLR116 Richard Moore  
HLR117 Anne McIntosh  
HLR118 Mr & Mrs A Payne  
HLR119 D J Hunt  
HLR120 Mrs J Barraclough  
HLR121 Philippa Preston

HLR122	M Barham
HLR123	Mr & Mrs Dennison
HLR124	Mrs H R Finch
HLR125	Mrs Sarah Morley
HLR126	J Charles N Weston
HLR127	Mrs M E Headley
HLR128	J R & F Jenkinson
HLR129	David Stonehouse
HLR130	Mr & Mrs Florey
HLR131	Mrs S Johnson
HLR132	Derek Cryer
HLR133	Donna Sclater
HLR134	Mrs B Blainey
HLR135	Mr P Laverick
HLR136	G Webster & L White
HLR137	Dr A & S Williams
HLR138	Mr J D Farquhar
HLR139	Harriet Hetheron
HLR140	M Goodlad
HLR141	G Goodlad
HLR142	Vivien Whalley
HLR143	Tessa McLeod
HLR144	Mr & Mrs Turner
HLR145	David Whalley
HLR146	Mrs D Cooper
HLR147	Mrs Beverly Hinchliffe
HLR148	Sir/Madam
HLR149	Mrs S Emmerson
HLR150	Ms B Kemp
HLR151	Alex Garbutt
HLR152	Mrs C J Chapman
HLR153	Mrs Burgess
HLR154	T Burgess
HLR155	Professor G H Bell & Mrs K M Bell

HLR156 Mr R D Finch  
HLR157 Mr & Mrs Smith  
HLR158 R G & S M Buckler  
HLR159 P Radcliffe  
HLR160 Lesley Gray  
HLR161 Lesley Gray  
HLR162 Mr M J Keen  
HLR163 J L Gabbott  
HLR164 Sir/Madam  
HLR165 D R Procter  
HLR166 Mr R Davies  
HLR167 Mr C M Marshall  
HLR168 Mr G & Mrs V Matthews  
HLR169 B M Sillito  
HLR170 J E Bywood  
HLR171 Lt. Col. W D Douglas  
HLR172 Janet Sanderson  
HLR173 Mr R T Benson  
HLR174 M & P Byrne  
HLR175 Mr & Mrs Rogers  
HLR176 Mr & Mrs Burdett  
HLR177 Mrs M Monkman  
HLR178 Mary Kemp  
HLR179 Wendy Halliday  
HLR180 Mr A M Bryars  
HLR181 Mr and Mrs Hunt  
HLR182 Margaret Barnes  
HLR183 R&R James  
HLR184 Mr N & Mrs D Wright  
HLR185 I S Neale  
HLR186 Anthony & Sheila Barnes  
HLR187 Mr & Mrs J Gill  
HLR188 Mr J Bates  
HLR189 J G Sigsworth

HLR190 Lionel Beck  
HLR191 Adam White  
HLR192 Mrs R Wright  
HLR193 Mr A J Marsden  
HLR194 Mrs Innes  
HLR195 Ms M Nelson  
HLR196 Paul Nesom & Lorraine Watson  
HLR197 Mrs Caton  
HLR198 Mr & Mrs Dobbs  
HLR199 Mr E Davison  
HLR200 Mr T Chadwick  
HLR201 Amy Peters  
HLR202 Welcome to Yorkshire  
HLR203 Jerry Scarr and Dr Mike Pitt  
HLR204 Jerry Scarr, Dr M Pitt, Doug Fich  
HLR205 Jerry Scarr  
HLR206 Andrew Cowley  
HLR207 S Greenwood  
HLR208 G Wood & B Wood  
HLR209 B & S Mossop  
HLR210 Mrs G Barber  
HLR211 JLGabbott

See HLR101 A & D Bolton  
See HLR101 G Batchelor  
See HLR101 PM Smith  
See HLR101 H E Faithfull  
See HLR101 B R Parsons  
See HLR101 G & M Robson  
See HLR101 R & FM Dawson  
See HLR101 George Jackson

See HLR36 Mr & Mrs Jones  
See HLR36 S Tipping  
See HLR36 G Swiers  
See HLR36 The Occupier  
See HLR36 A, J & C Oates  
See HLR36 J V Nichol  
See HLR36 S Cook  
See HLR36 M J & S Keen  
See HLR36 E & W Craven  
See HLR36 R & H Davies & B Birch  
See HLR36 Sir/Madam  
See HLR36 G P Webster & L S White  
See HLR36 The Occupier  
See HLR36 P & J Ashton  
See HLR36 J & M Hargreaves  
See HLR36 H Arison  
See HLR36 P & W R Perkins  
See HLR36 J & R Riddell  
See HLR36 V F & J G Popham  
See HLR36 P Radcliffe  
See HLR36 M Curry  
See HLR36 J Kelbrick  
See HLR36 Dr F Beardsley  
See HLR36 F C & P Clarke  
See HLR36 J & B Burdett  
See HLR36 J & P French  
See HLR36 T H & M Lilley  
See HLR36 R A James  
See HLR36 V & P Bainbridge  
See HLR36 The Occupier  
See HLR36 The Occupier  
See HLR36 V Barrett  
See HLR36 Sir/Madam  
See HLR36 S Ring



See HLR36 L Watson & P Nesom  
See HLR36 M Parkin  
See HLR36 The Occupiers  
See HLR36 Sir/Madam  
See HLR36 J El-Sharif  
See HLR36 V Cump  
See HLR36 J A & C L Lunn  
See HLR36 J B Lunn  
See HLR36 R Smith

## **SECTION J**

### **INTER-PARTES CORRESPONDENCE**

J1 Mike Convery to Paul Foster, 28 March 2011  
J2 Paul Foster to Mike Convery, 6 May 2011 (enclosing CD/H12)  
J3 Paul Foster to Mike Convery, 8 June 2011  
J4 Laura Renaudon to Glenn Sharpe, 16 August 2011

## **SECTION K**

### **APPEAL QUESTIONNAIRES, COMMITTEE REPORTS & PINS CORRESPONDENCE**

K1 Moorland Energy Limited Appeal Form (NYCC) dated 20 June 2011  
K2 Moorland Energy Limited Appeal Form (NYMNPA) dated 20 June 2011  
K3 North Yorkshire County Council Appeal Questionnaire dated 3 August 2011  
K4 North York Moors NPA Appeal Questionnaire dated 2 August 2011  
K5 Inspector's Pre-Inquiry Meeting Minutes dated 22 August 2011  
K6 NYMNPA committee report dated 21 July 2011 (consultation to NYCC)  
K7 Minutes of K6 dated 18 August 2011  
K8 Ryedale District Council committee report of 27 July 2011 (consultation response)  
K9 Minutes of K8  
K10 NYCC committee report & addendum of 30 August 2011  
K11 NYMNPA committee report of 15 September 2011 (when available)

## **SECTION L**

### **STATEMENTS OF CASE**

**SECTION M**  
**STATEMENTS OF COMMON GROUND**

**SECTION N**  
**SECTION 106 AGREEMENTS**

N1 Section 106 Agreement re. Knapton 22 April 1992

**SECTION O**  
**DOCUMENTS SUBMITTED DURING THE INQUIRY – MOORLAND**

**SECTION P**  
**DOCUMENTS SUBMITTED DURING THE INQUIRY – AGHAST**

**SECTION Q**  
**DOCUMENTS SUBMITTED DURING THE INQUIRY – NYMNPA**

**SECTION R**  
**DOCUMENTS SUBMITTED DURING THE INQUIRY – NYCC**

**SECTION S**  
**DOCUMENTS SUBMITTED DURING THE INQUIRY - OTHERS**