

Publication stage Response form - Part B		
Please use a separate Part B form for each representation		
Name or Organisation :	Ryedale Liberals 12.2 Appendix 12	
• To which part of the Minerals and Waste Joint Plan does this representation relate?		
Paragraph No./ Site Allocation Reference No.	Policy No. M18 3846/0978/M18/LC.U.DTC	Policies Map
2. Do you consider the Minerals and Waste Joint Plan is :		
2.(1) Legally compliant	Yes	No
2.(2) Sound		
(2a) Which Element of soundness does your representation relate to? (please only mark with an x one element of soundness per response form).		
<i>Positively Prepared Effective</i>	No ? No?	<i>Justified Consistent with National Policy</i> No? No?
2 (3) Complies with the Duty to co-operate	Yes	

3. Please give details below of why you consider the Minerals and Waste Joint Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

A minerals and waste plan that doesn't have any plan for waste struggles to comply with any of the tests. Our original submission referred to the only other waste produced by fracking in the UK (Cuadrilla Lancs) Fracking may produce a massive range of waste. Our concern here is only for the billions of gallons of waste water containing radioactivity and toxic chemicals. These are within a range, but our concern is in reference to these. Your response to our original challenge refers to the 'very early stages' of development of the industry. In any basic logical approach, it is normal to plan first and then proceed. Your response appears to be to proceed first and then plan. We suspect that the EA may well regulate the emissions from the N Yorkshire waste incinerator. That did not mean that the handling of all this waste is out with the plan.

4. Please set out what modification(s) you consider necessary to make the Minerals and Waste Joint Plan legally compliant or sound, having regard to the Matter you have identified at 3. above where this relates to soundness. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Minerals and Waste Joint Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

M18 1 i) Support the policy, but would require that the organisation proposed to perform waste processing can demonstrate that it has the capacity. The capacity needs to keep pace with proposed developments.

In the hierarchy of waste, re-use is the preferred option. Fracking wastewater is toxic and carcinogenic so before it is used back down the well it must be checked against the Environment Agency standards for 'Non-Hazardous to groundwater'. In addition unusual chemicals must be studied.

When water can no longer be used, it should be transported to a disposal site with full chemistry being disclosed to the receiving plant and to the driver in case of spills or accidents.

There must be a defined maximum quantity of wastewater that companies are permitted to store on site.

ii) suggests standards to allow re-injection. This is not Industry Best Practice and is banned by EU law. It can precipitate seismicity especially in highly faulted formations as found in England and particularly Ryedale. High standards of protection cannot be guaranteed until the UK regulations and engineering have been fully tested. Re-injection should thus not be permitted.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As the response does not answer our point we feel there needs to be discussion at the EIP.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

All responses received will be considered and any information provided will be made public. My consent is hereby confirmed.

Signature:
John Clark

Date:
11 Feb 18