

Submission to the Examination in Public of the Minerals and Waste Joint Plan: Waste Management Overview

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73. Does the MWJP identify all the main challenges to providing sufficient, sustainable waste management facilities in the Plan area, and are these challenges properly reflected in the vision and objectives and incorporated in policy?

The plan doesn't specifically identify how waste from the hydrocarbon industry will be dealt with. If the unconventional hydrocarbons industry reaches a full commercial scale, this will be the biggest waste challenge the regions will face, given that large quantities of waste water are generated and that this water is typically highly saline and contaminated with heavy metals, hydrocarbons and naturally occurring radioactive materials. I do not believe that there is any sustainable way of dealing with this waste stream. For this reason the plan cannot be said to be justified.

75. Does the MWJP seek to achieve the most appropriate spatial strategy for waste development? How is this reflected in the Plan?

There is not enough clarity on where disposal facilities for waste from the hydrocarbon industry might be located. There is a principle in the plan that the joint plan area should aim for self sufficiency where this is practical. Policy W11 also makes clear that sites of existing waste development are preferred. However this does not provide enough clarity. Currently waste water from the hydrocarbons industry is transported out of the joint plan area. If the unconventional hydrocarbons industry expands, the existing national capacity for dealing with this type of waste water is likely to be exhausted and there will be pressure to provide disposal facilities in the joint plan area. I would never support such a development, but I do think the people threatened by the prospect of such a development near their homes, work places or local green spaces have a right to know. There should therefore be a site identification process and a consultation with the public to determine if they welcome the prospect of such development. Until this issue is addressed the Joint Minerals and Waste Plan cannot be considered to be justified.

In the future waste water from the hydrocarbon industry might be dealt with by widespread use of re-injection wells. Currently re-injection can only be used in very limited circumstances, but this may be change in the future. Such a move would be disastrous, but I am glad to see the measures in place in part 1) ii) of policy M18 to control this form of development.