Planning Application NY/2025/0030/ENV

Dear Sir/Madam,

I write to you on behalf of Scarborough Birders to object to the above Planning Application submitted by Europa Oil and Gas in respect of an exploratory Proppant Squeeze site in Burniston. I also write as a resident of the village. My colleague and chairman of Scarborough Birders originally wrote to object to the initial proposal to undertake this work some time ago. He stated that although the site itself is likely to be of limited ornithological value and that an Environmental Impact Assessment should be conducted, I feel that now a planning application has been received, it would seem appropriate to raise several issues of contention. The possibility of Long-Eared Owls (*Asio otus*) breeding in the area was of concern, given the fact that the species, a green listed species of least concern as determined by the Birds of Conservation Concern conference 5, is a species which does breed within the Burniston area. Mr. Addey also raised concerns over the risk of contamination to local water courses, including a number of agricultural containment ditches. Burniston beck is a water course within the catchment area, which in turn feeds water into an important area of marshland known locally as Johnson's Marsh, OS grid reference TA023914, and which is situated approximately one kilometer south of the proposed site. This wetland habitat, scarce in itself in the Scarborough area, is of significant importance to overwintering and breeding wildfowl, regularly attracting rare and scarce migrants on passage and supporting important local breeding habitat for Shelduck (*Tadorna tadorna)*, Mallard (*Anas platyrynchos*), *Moo(Gallinula chloropus*), Coot (*Fulica atra*) and finally Grey Heron (*Ardea cinera*), a species which has only recently colonized the marsh and is only one of two active heronries in the Scarborough recording area. Johnson's Marsh is managed by Scarborough Birders, an active and conservation focused group. Moorhen and Mallard are BOCC5 amber listed species, currently of least concern, but being robustly monitored owing to concerns over declines in global population and range and habitat contraction. Coot and Grey Heron are BOCC5 green listed species of least concern owing to an acceptable level of stability within the breeding population and range. All of these species rely on a clean source of water for foraging and a ready supply of appropriate food. Grey Heron is more catholic in its feeding habits, preying mainly on amphibian, rodent, fish, and other birds. It is important, therefore, to maintain a healthy food chain to support these species, and any pollution could result in a severe compromise and a devastating loss of an entire food chain.

I note from the planning application that an Environmental Impact Assessment has been conducted on behalf of Europa Oil and Gas following the initial proposal. Are you in a position to advise me whether this included a full ecological survey on flora and fauna within the site area and immediate environment and what methodology was used, or was it purely conducted in respect of noise, air pollution and associated matters? There would seem to be a non-transparent approach to this information on the Europa Oil and Gas application, and I understand that a considerable cost would be involved to facilitate this information. I have been a surveyor for the British Trust for Ornithology now for some 35 years, conducting Breeding Bird Surveys and Wetland Bird Surveys all over the country. If you are not already aware, Breeding Bird Surveys are conducted annually between April and June, a specific period of time, in order to obtain data to ascertain declines in populations, declines in productivity and constriction of distribution, in addition to losses of certain species altogether from areas surveyed over time. The Wetland Bird Survey is conducted once a month, predominantly between the autumn and winter months of September to March and provides a core count of wildfowl and wetland birds frequenting areas around the UK. Once again, its objective is to achieve the same aims as the Breeding Bird Survey. I am aware that the proposal was submitted

on 2nd August 2024 and, initially, Europa Oil and Gas stated that it did not require an EIA. However, a decision was made by the Government to negate the need for an EIA in this matter, based on the information available to them on the proposal at the time, Europa Oil and Gas declared, quite reasonably, that one would be conducted as a matter of course and submitted through the planning application. May I suggest that any survey conducted regarding any aspect of flora and fauna be seriously flawed and biased, owing mainly to the fact that the surveys would have been conducted outside of the recommended times. Natural history commands the same importance as other environmental issues.

The village of Burniston is located within the coastal bird migration corridor, where migrant birds are recorded regularly. One extremely important aspect of migration here is the phenomenon of nocturnal migration, particularly during the spring and autumn months. Many species of birds use this method of migration as a safe and accurate means of achieving their migration goals. I note that the original proposal by Europa Oil and Gas was to erect a 30-meter drilling rig on site and that the period of time for the feasibility of the work was five weeks. The height of the drilling rig on the planning application is now shown as 38 meters, a significant height increase of eight meters or an increase of 26.6%. This would increase the risk of bird strikes during poor weather, for example, where visibility at night would be seriously compromised, even if the structure is illuminated. There are a number of scientific papers which discuss the effects of light characteristics on nocturnal avian mortality at similar structures such as lighthouses, oil and gas drilling rigs and burn off towers at sea, where disorientation in migratory flight is caused by fog and poor weather conditions. I would also suggest that, conversely, any illumination of the higher drilling rig at nighttime would also increase light pollution in the area, affecting local residents.

I understand that the original proposal of a five-week time frame in order to conduct on site work has now risen to seven weeks and new information regarding the drill rig height is 38 meters, which will be considerably more obvious to the residents of Burniston. The government decision to negate the need to conduct an EIA would therefore have been based on the old information rather that the new information. I appreciate that Europa Oil and Gas did conduct an EIA but I wonder if the new information may have had any wider affect on the application as a whole.

Europa Oil and Gas claims in it's various statements to be environmentally friendly in that the processes utilized "Is much better for the environment as it displaces LNG imports which have significantly more greenhouse gas emissions than domestically produced gas". However, I wonder if the greenhouse gases emitted by the heavy goods vehicles moving to and from the site have been factored into the Environmental Impact Assessment presented to North Yorkshire County Council. Europa Oil and Gas states that tankers carrying water to the site are the chosen method of transport in this case, and, with the time extended now to a seven-week period in the Planning Application, which would mean an extra 400 HGV movements, an increase on the original 1,000 movements predicted in the original proposal. Tankers are considerably large vehicles, with a maximum gross vehicle weight of between 44 and 48 tonnes for a standard articulated vehicle. In terms of environmental impact, the carbon emissions from these estimated 1,400 vehicle movements will be significantly higher than originally stated in the proposal. To provide a fair outline of carbon emission from a standard 3 axle rigid tipper HGV, with a maximum gross train weight of 26 tonnes, the carbon emission per mile is 0.2 kilograms. This will vary on vehicle type and age, load weight, fuel efficiency, with diesel being the main fuel, and driving conditions. The carbon emission for a larger vehicle will, therefore, be higher.

My principle objection of behalf of Scarborough Birders to this Planning Application naturally concerns the health and welfare of both the birds, and indeed, other flora and fauna, and their habitats, together with the food resources they require in order to exist. Without sight of the Environmental Impact Assessment, it is difficult offer any further comment other than the lack of transparency shown by Europa Oil and Gas and discrepancies between the original proposal and the current Planning Application that you have before you. I welcome any comments and answers you can provide to my questions and queries in order that they may be fed back to members of Scarborough Birders.

Yours truly,

Keith

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Secretary of Scarborough Birders.

Principle References:

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