41 Alder View Court
1A Newby Farm Road
Newby
Scarborough
YO12 6WA
13 March 2025

Planning Department
County Hall
Racecourse Lane
Northallerton
DL7 8AD

Authority: North Yorkshire Council

Type of consultation: Planning Application

Full details of application/consultation: NY/2025/0030/ENV -Construction of a temporary well site for the appraisal of gas, including drilling operation, proppant squeeze and flow testing operation and site restoration.

At land: east of The Mill Yard, Burniston Mill, Coastal Road, Burniston, Scarborough,

Type of response: Objection

Case Officer: Amy Taylor

Dear Planning Department

Re: Objection to planning application NY/2025/0030/ENV

I write to **OBJECT** to this planning application to use hydraulic fracturing (fracking) to explore for (and subsequently get) natural gas which will contribute to global warming, have a detrimental impact upon the character and amenity of the Heritage Coast and could cause fracking induced seismicity. Further, there will be an unacceptable impact upon the peace and enjoyment of close neighbours and the coastal communities in their homes and gardens and upon the local ecology and wildlife.

The planning application was submitted by Egdon Resources UK Ltd on behalf of Europa Oil and Gas. For the sake of brevity, I shall use the term Europa or Europa Oil and Gas to mean the applicant and the agent.

Sustainable development

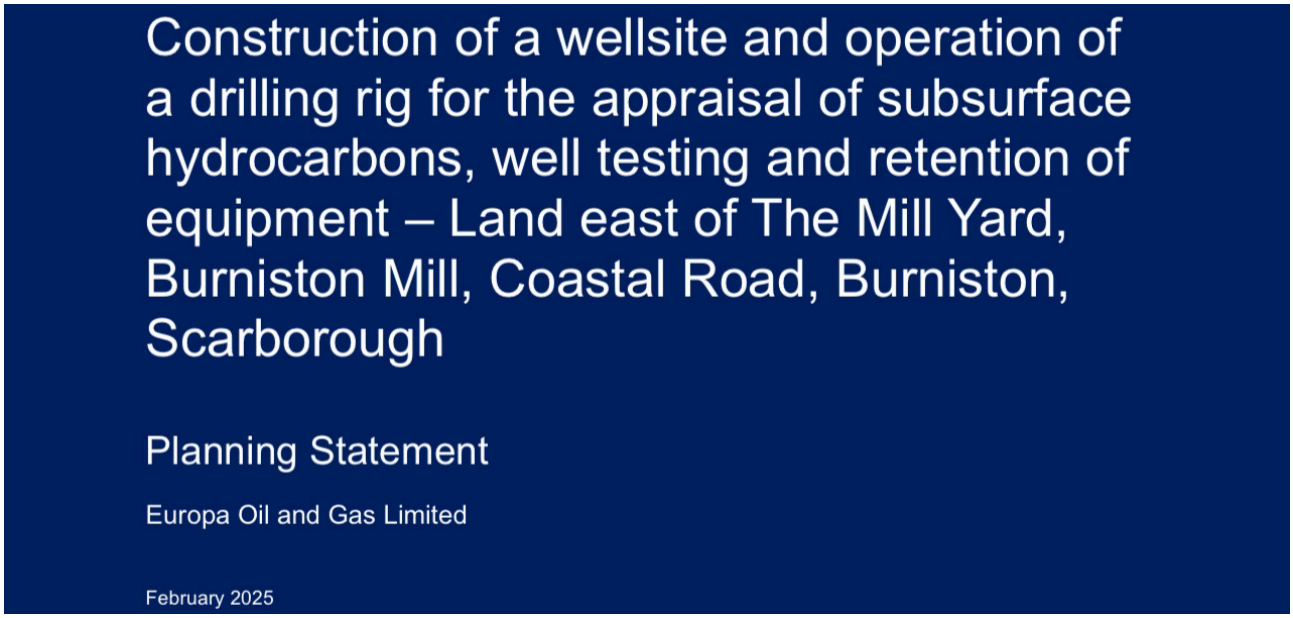
Cloughton wellsite Planning Statement

The proposal has also been found to accord with the key material considerations, including the National Planning Policy Framework (NPPF) and the relevant Planning Practice Guidance notes. In terms of the NPPF, the proposal is considered to be 'sustainable development' to which the presumption in favour of sustainable development applies.

Europa makes the assertion[1] that the planning application is 'sustainable development' to which the presumption in favour of sustainable development applies. I have found no evidence in the application that supports this claim. How can a planning application to explore for (and ultimately get) gas which will be burned and add to dangerously high concentrations of greenhouse gases be described as sustainable? It is not.

[1] Cloughton Planning Statement - Executive Summary - page 6.

Europa's Proposal - Construction of a temporary well site for the appraisal of gas, including drilling operation, proppant squeeze and flow testing operation **and site restoration.**


Construction of a wellsite and operation of a drilling rig for the appraisal of subsurface hydrocarbons, well testing and retention of equipment – Land east of The Mill Yard, Burniston Mill, Coastal Road, Burniston, Scarborough

Planning Statement

Europa Oil and Gas Limited

February 2025

The front sheet of Europa's Planning Statement, shown above, tells another story - because we learn that the company apparently does not intend to restore the site to its original condition but intends to 'retain equipment.' Further evidence is shown in the screenshot below taken from the Introduction to the Planning Statement.


1. Introduction

Scope

This Planning Statement has been prepared to accompany a planning application submitted by Europa Oil and Gas Limited ('Europa') to North Yorkshire Council (NYC) in its capacity as Mineral Planning Authority (MPA).Europa is seeking planning permission for the following development:

> *The construction of a wellsite and operation of a drilling rig for the appraisal of subsurface hydrocarbons, well testing and retention of equipment on land east of the Mill Yard, Burniston Mill, Coastal Road, Burniston, Scarborough*

For clarity, Europa will not use the process known as High Volume Hydraulic Fracturing (commonly referred to as 'fracking').

These conflicting statements are repeated[2] throughout the application and supporting documentation. Both statements cannot be true and the planning application should be rejected on those grounds alone.

Planning objections

My main planning reasons for objecting to Europa's planning application are:

1. Climate change
2. The Heritage Coast
3. The applicant has not demonstrated an overarching need for onshore gas
4. Hydraulic fracturing and induced seismicity
5. Negative effects upon neighbouring villages and communities

[2] For example - compare the front sheet of the Environmental Impact Assessment Vol 1 with the Preamble on page 6, 1.1 Phase 4.

6. Potential impacts on tourism
7. Increased HGV traffic
8. Effects upon wildlife and ecology.

1. Climate change

The Europa application acknowledges the existence of global warming/climate change without accepting that the consequences of burning gas from the Cloughton gas field will make matters worse. They claim that their application is for exploration alone but, by 'retaining equipment" on the site, they reveal that their intension is to develop the site into a full production facility. They have not produced a Scope 3 analysis of greenhouse gas emissions (as required by the Finch judgement.) The science behind Climate Change is undeniable and presents, in the view of many experts in the field, an existential threat to future generations. As I write this letter of objection, the headlines in my newspaper refers to the California fires and the fact that 2024 was the hottest year on record and the first to exceed the 1.5deg C Paris limit (to 1.6deg C.) The previous week's headlines referred to UK flood damage and previous headlines provide a catalogue of global disasters attributed to global warming caused by human activity by burning fossil fuels and increasing greenhouse gases since the industrial revolution. The World Meteorological Organisation in its State of the Climate 2024 report said:

> "*The record breaking rainfall and flooding, rapidly intensifying tropical cyclones, deadly heat, relentless drought and raging wildfires that we have seen in different parts of the world this year are unfortunately our new reality and a foretaste of our future.*[3]*"*

A quick internet search (NASA) shows the latest reading for CO2 at its Mauna Loa Observatory is 424 ppm (parts per million) - yet another world record. This was the 12th year in a row that the global atmospheric average of CO2 increased by more than 2ppm. A similar trend can be observed by another, even more powerful greenhouse gas, methane which is also at a record high of 1922 ppb (NASA) and has more than doubled over the last 200 years.

The consequences of human induced global warming are clearly presented in many scientific studies and has led to policies being adopted by local and national governments in an attempt to reduce levels of these dangerous greenhouse gases. The UK government passed the Climate Change Act in 2008 and North Yorkshire Council declared a climate emergency on 5 July 2022 (minute 35 of the Agenda for Executive on 5 July 2022) and adopted policies to reduce its carbon footprint (e.g. Beyond Carbon.) It is regrettable that the MWJP contains few policies that match the commitment shown by the climate emergency. Climate Change is mentioned in 2.5 on pages 22 and 23 and refers to efforts to reduce greenhouse gases by NYC and partner organisations but by no stretch of the imagination can it be argued that the MWJP meets the challenges we are facing. Climate scientists are warning that we are already approaching or may exceed tipping points where irrevocable and catastrophic changes can take place.

This seems to be recognised on pages 45 and 46 of the MWLP - Monitoring and Review:

> *4.10 - "The need for review may arise as a result of factors such as a significant change in circumstances, including the availability of new evidence or as a result of a change to national policy …"*
>
> *4.11 - The uncertainty around climate change and accumulation of greenhouse gases as a consequence of hydrocarbon burning are identified as factors that should be monitored and reviewed with a "precautionary approach reflecting this uncertainty." This aspect of uncertainty is recognised in d) below:*
>
> *d) the environmental, economic, amenity or public health impacts of hydrocarbon development (including impacts from greenhouse gas emissions and on climate change, and as a result of induced seismicity).*

[3]Celeste Saulo, World Meteorological Organisation secretary general, State of the Climate 2024 report.

The change of government following the general election of 2024 has coincided with and been followed by a number of important environmental and energy commitments.

Legislation and references	Reasons for inclusion
The Climate Change Act 2008	The Climate Change Act was passed in the UK in November 2008 with an overwhelming majority across political parties. It sets out emission reduction targets that the UK must comply with legally. It represents the first global legally binding climate change mitigation target set by a country.
Supreme Court Judgement - Finch v Surrey County Council and others - 20 June 2024.	The claimant (Sarah Finch) appealed to the Supreme Court. By a three to two majority, the Supreme Court allowed the appeal and holds that the council's decision was unlawful because the emissions that will occur when the oil produced is burnt as fuel are within the scope of the EIA required by law.
Climate Change Committee Report 2024	"Urgent action needed to get on track for the UK's 2030 target. We recommend that the UK's NDC (Nationally Determined Contribution) commits to reducing greenhouse gas emissions by 81% from 1990 to 2035."
The Great British Energy Bill was introduced to parliament on 25 July 2024 and is progressing through the committee stages towards becoming law.	The Bill seeks to replace our reliance on fossil fuels (including gas) with locally produced clean energy delivering clean power by 2030 and accelerating to net zero.
United Nations Climate Action President Trump has recently announced that the USA has withdraw from the Paris Agreement.	2024 - Hottest year on record. "Blazing temperatures in 2024 require trail-blazing action" - UN Secretary General.

The National Planning Policy Framework (The Framework) Chapter 14. "Meeting the challenge of climate change, flooding and coastal change" offers clear guidance to planning authorities in paragraphs 161 to 186 - see extract on page 3 below:

14. Meeting the challenge of climate change, flooding and coastal change

Paragraphs 161 to 186

161. The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Planning for climate change

The UK government (this part of The Framework was issued prior to the change of government in 2024) across the political spectrum clearly recognises the need to respond as a nation to the challenges of global warming and states: *"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change."*

The impacts of climate change and the imperative for action are also recognised at a local and regional level. The Yorkshire and Humber Climate Commission has recently updated its Climate Action Plan[4] and has a foreword from leaders across political parties on behalf of Yorkshire's Leaders Board:

> *"The impacts of climate change are already being felt here and now in Yorkshire and the Humber and across the globe. We have experienced a number of extreme weather events in recent years, from extensive flooding during the winters of 2019/2020, 2021 and 2023, through to heatwaves, drought and wildfires in 2022 and 2023. Climate change is affecting our communities, our farmers and our natural world."*
>
> Councillor Carl Les OBE (Leader, North Yorkshire Council and Councillor Susan Hinchcliffe (Leader, Bradford Council)

My main objection to the proposed planning application is the known effects of the burning of fossil fuels (including gas) on the level of atmospheric greenhouse gases and the consequential impact on global warming. This is recognised in the Supreme Court Finch judgement that required EIAs to include downstream CO2 production. More recently, the Court of Session in Edinburgh has ruled that the Rosebank and Jackdaw developments are unlawful because "the effects of climate change outweighed the interests of the developers." Whilst recognising that this application is for exploration of gas reserves in the Cloughton gas field, it is clearly the intention of the applicant to extract and burn gas for twenty years. I note that the planning officer's Screening Opinion decision (NY/2024/0113/SCR) was that an EIA would be required but this was overturned by an official in the DESNZ. The decision from the DESNZ was, in my view, irrational and the planning officer's decision that an EIA was required was the correct decision. I have to say that the fact that Europa lodged an appeal against the planning officer's determination that an EIS was required did not look good and left a bad taste.

The evidence is clear that gas should remain in the ground if we are to stand any chance of reaching our climate obligations and **the application should be refused.**

2. The Heritage Coast, SSSI, the North York Moors National Park and the National Trust

The Cloughton gas field that Europa is proposing to exploit is thought to extend from the Newby, Scalby and Scarborough through Burniston and Cloughton towards Staintondale and Ravenscar and includes designated Heritage Coast and SSSI's. The North and Western extents of the gas reservoir is likely to extend into the North York Moors National Park[5] and Natural England's National Character Area 25 - North York Moors and Cleveland Hills. The coastline includes the North Yorkshire Coastal Waters Marine Character Area. There is also the Cinder Track which follows the disused Scarborough to Whitby railway and is very popular with walkers, cyclists and horse riders and is a designated Sustrans Route 1. Immediately along the coastline is the Cleveland Way which links to National Trust sites to the North and is intended to eventually provide circumnavigation of the island of England, Scotland and Wales. It's fair to say that the proposed development site is a particularly sensitive area that should be protected by the planning system and is essential to the local tourism economy.

Character and appearance

Chapter 15 of the National Planning Policy Framework (Paragraphs 187 to 201) sets out the government's planning policies for Conserving and enhancing the natural environment and has relevance to the proposed industrial well pad site situated within the designated Heritage Coast and close to the North York Moors National Park. Of particular relevance to this application are paras 187 and 191 below:

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[4] Yorkshire and Humber Climate Commission (2024) - Statement of support from the Yorkshire Leaders Board

[5] Europa Oil and Gas Proactive One2One Investor Forum 5 September 2024 - slide 11 Well Objective

187. *Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value value and soils:*
b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and trees and woodland.*
c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate.*
d) *minimising impacts on and providing net gains for biodiversity ….*
e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. ….*
f) *remediating despoiled land - not relevant.*

191. *Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.*

Policies of the Minerals and Waste Local Plan that are relevant to this application include Policy D06: Landscape 1), 2), 3) and 4).

Policy D06 Landscape

3) Protection will also be afforded to the historic character and setting of York and to areas defined as Heritage Coast. Permission will only be granted where it would not lead to an unacceptable impact on the historic character and setting of York or on the undeveloped character of the Heritage Coast, unless the need for, or benefits of, the development outweigh the harm caused.

The site lies within the North Yorkshire Moors and Cleveland Hills character area, which contains a distinctive and dramatic coast with high cliffs, small coves and bays, along with extensive views to and from the National Park. The existing mill building, including a grain drier, is visible from the A165 and appears as an industrial type structure, albeit screened in some views by nearby trees. This building is also apparent at a distance from some parts of the Cleveland Way. So too is the sewage treatment works, which is located in an open area to the south of the application site. However, this is designed to look like farm buildings. Notwithstanding these structures, this is an attractive coastal area where the steep cliffs and rocky coves abut undulating farmland. The coastal footpath offers dramatic views of the rugged coastline, along with contrasting views over a rolling rural landscape towards a backdrop of wooded hills within the National Park. The quality and variety of this landscape give the area considerable scenic value. The Framework[6] provides that authorities should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast.

The proposed industrial gas well platform at The Mill Yard on the Coastal Road is only 800m from the North York Moors National Park. The elevation of the NYMP provides uninterrupted views of the Heritage Coast towards Scarborough Castle and beyond to the South and towards Ravenscar to the North. The 30m drilling rig proposed by Europa would have significant adverse landscape and visual effects, would harm the character and appearance of the Heritage Coast and would amount to an inappropriate change to industrial use of this designated agricultural grade 3 land.

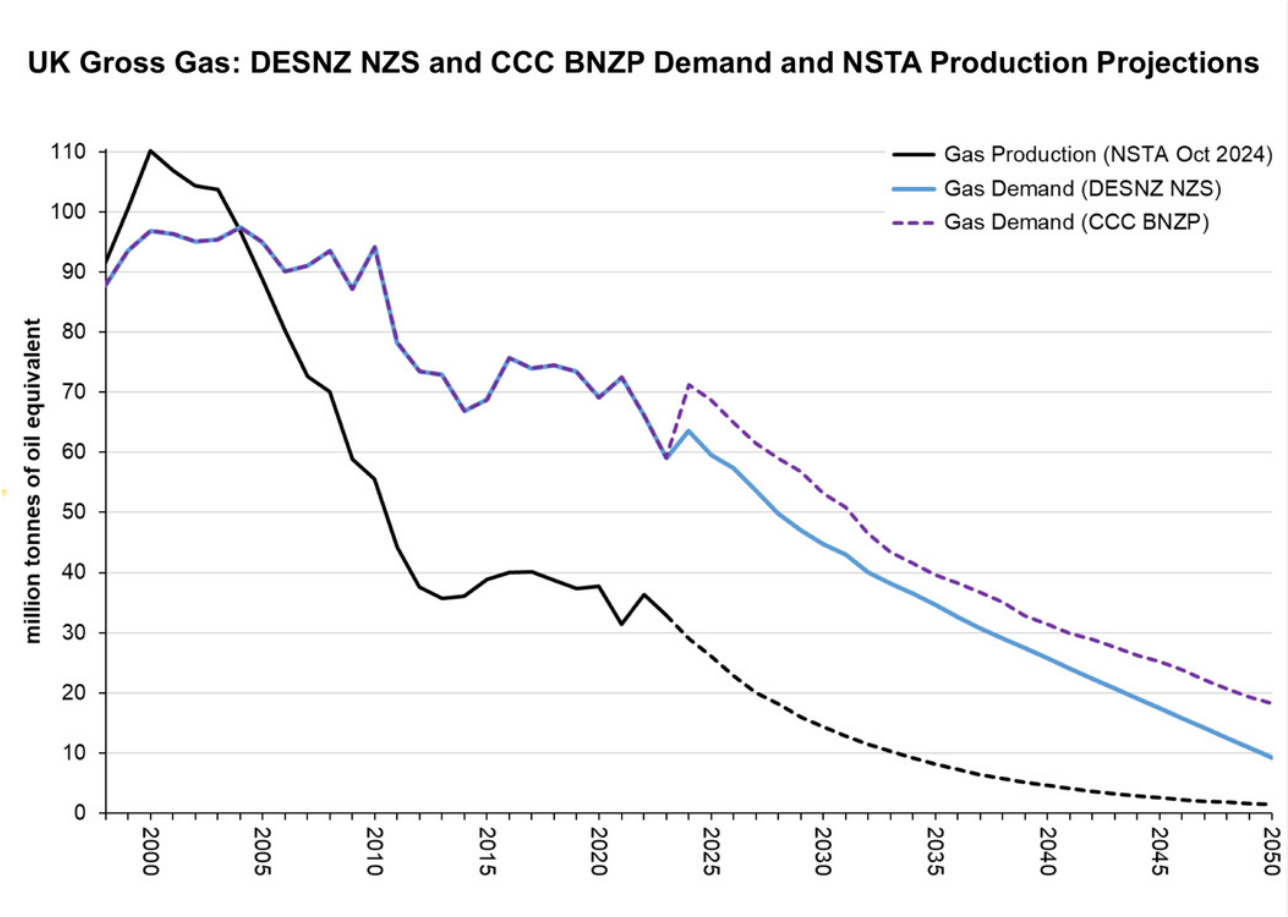
Although this application is for exploration, it should be seen in the context that if the gas well is financially viable, further applications can be expected prior to appraisal and eventual production.

[6] National Planning Policy Framework - “The Framework”

The Global Warming and Climate Change implications of full scale production of natural gas have been dealt with in 1. above but I will reiterate that, following the Supreme Court (Finch) judgement, a full scope 3 downstream greenhouse gas emissions assessment must be provided by Europa Oil and Gas before the MWPA should determine this application. The MPA must, as far as practicable, be in possession of the full facts before making a decision.

Scarborough's economy depends upon people visiting the area and there is no doubt that amongst the main attractions are the unspoilt coastline leading north to Robin Hoods Bay and beyond. The application to explore for gas from the Mill Yard site is entirely inappropriate large scale industrial process that would lead to an unacceptable impact on the undeveloped character of the Heritage Coast and **the application should be refused.**

3. The need for onshore gas



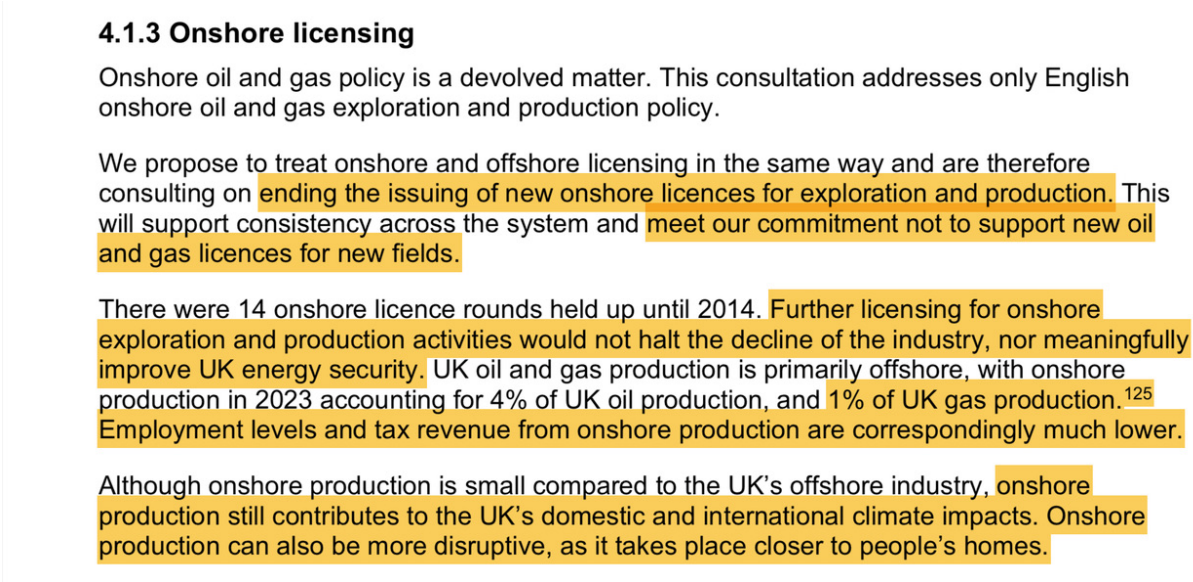
Historical and projected UK Gas production - Figure 3 of Building the North Sea's Energy Future - DENZ 20 April 2025

Europa acknowledges that demand for natural gas in the UK has been falling year by year and this trend will continue into the future. We have to rid ourselves of our dependency on fossil fuels if we are going to meet our climate change commitments.

Onshore licensing - Building the North Sea's Energy Future - DENZ 20 April 2025

Much of Europa's Planning Statement and justification for their proposed gas exploration (and development) relies on old and out of date government and planning policies that relate to another time. There is little recognition given to the scale and pending disaster of climate change and the imperative to act. The screenshot shown on page 8 below shows the direction of travel and, in my view, Europa should take this on board. We are told that the government '*will not issue new onshore licenses for exploration and production*' and '*Further licensing for onshore*

exploration and production activities would not halt the decline of the industry, nor meaningfully improve UK energy security.' Although onshore production is small compared to the UK's offshore industry, '*onshore production still contributes to the UK's domestic and international climate impacts.'* Onshore production '*can also be more disruptive, as it takes place close to people's homes*.'



4.1.3 Onshore licensing

Onshore oil and gas policy is a devolved matter. This consultation addresses only English onshore oil and gas exploration and production policy.

We propose to treat onshore and offshore licensing in the same way and are therefore consulting on ending the issuing of new onshore licences for exploration and production. This will support consistency across the system and meet our commitment not to support new oil and gas licences for new fields.

There were 14 onshore licence rounds held up until 2014. Further licensing for onshore exploration and production activities would not halt the decline of the industry, nor meaningfully improve UK energy security. UK oil and gas production is primarily offshore, with onshore production in 2023 accounting for 4% of UK oil production, and 1% of UK gas production.[125] Employment levels and tax revenue from onshore production are correspondingly much lower.

Although onshore production is small compared to the UK's offshore industry, onshore production still contributes to the UK's domestic and international climate impacts. Onshore production can also be more disruptive, as it takes place closer to people's homes.

Onshore licensing - Building the North Sea's Energy Future - DENZ 20 April 2025

It seems to me that Europa Oil and Gas should see the writing on the wall, recognise that their old fossils industry is obsolescent and move into energy supplies of the future rather than attempting to cling on to what is unsustainable. Perhaps - Europa Sun and Wind? That would create more skilled jobs than those listed in their planning application.

According to a recent article (2 January 2025) in the independent Drill or Drop website, onshore gas production in the thirteen months to December 2024 amounted to an insignificant 0.78% on average of total national gas consumption. At the same time, according to a recently published Department of Energy Security and Net Zero report (Energy Trends - 19 December 2024 page 5) the amount of gas used in the national energy mix has continued to fall, reaching a record low in Q3 2024.

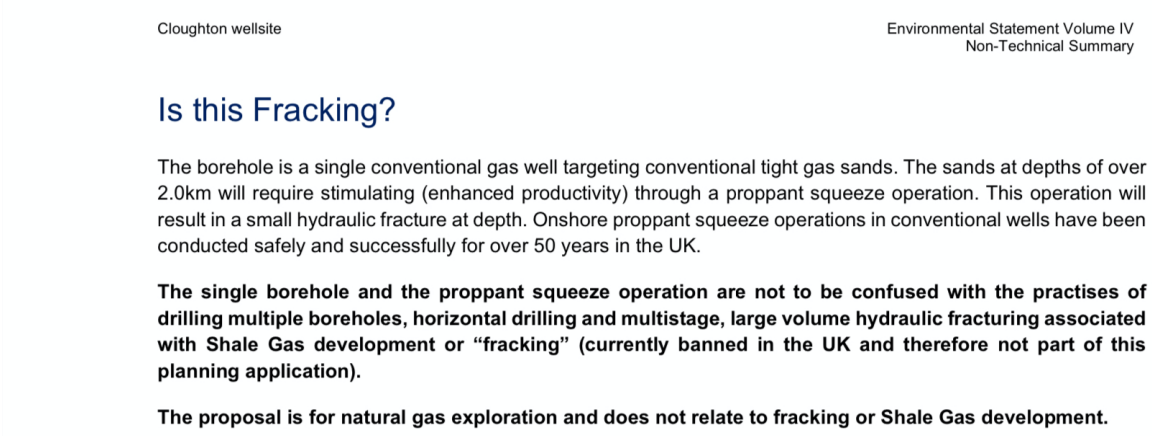
The trend is away from natural gas (a fossil fuel that produces greenhouse gases) towards renewable energy sources such as wind, solar and Small Modular Reactors (6 December 2024 Policy paper - Advanced Nuclear Technologies.)

The UK imports much of its gas in the form of LPG (Liquid Petroleum Gas) mainly from the USA and Qatar and through pipelines from European countries, especially Norway. No gas is currently imported from Russia following sanctions that were imposed after the invasion of Ukraine.
The government has stated that its diverse energy infrastructure together with the capacity to import gas will ensure a stable supply of energy. These are secure supplies from diverse sources.

Europa Oil and Gas has not demonstrated an overarching national need for this onshore gas field that overrides the necessity to preserve our Heritage Coast coast and is in the national interest. It has been shown that there is no national need for the relatively small amount of gas possibly contained within the Cloughton gas field. The negative impacts upon Global Warming, local tourism, the Heritage Coast and the negative effects upon neighbouring communities substantially outweigh the claimed benefits put forward by Europa Oil and Gas and **the application should be refused.**

4. Hydraulic fracturing (fracking) and induced seismicity

'For clarity, Europa will not use the process known as High Volume Hydraulic Fracturing (commonly referred to as 'fracking').



Cloughton wellsite

Environmental Statement Volume IV
Non-Technical Summary

Is this Fracking?

The borehole is a single conventional gas well targeting conventional tight gas sands. The sands at depths of over 2.0km will require stimulating (enhanced productivity) through a proppant squeeze operation. This operation will result in a small hydraulic fracture at depth. Onshore proppant squeeze operations in conventional wells have been conducted safely and successfully for over 50 years in the UK.

The single borehole and the proppant squeeze operation are not to be confused with the practises of drilling multiple boreholes, horizontal drilling and multistage, large volume hydraulic fracturing associated with Shale Gas development or "fracking" (currently banned in the UK and therefore not part of this planning application).

The proposal is for natural gas exploration and does not relate to fracking or Shale Gas development.

It seems to me that Europa Oil and Gas are sensitive to suggestions that they are planning to use the process known as 'fracking' at the Burniston gas well site. It is accepted that Europa are not planning to explore shales and that the volumes of liquids used are below the threshold defined as High Volume Hydraulic Fracturing and subject to a moratorium, but they cause confusion when, in the Non-Technical Summary (extract above), they refer to large volume hydraulic fracturing. It seems to me that the word fracking has many meanings but there is one thing upon which we can all agree - Europa proposes to use very high hydraulic pressure to fracture rocks under ground - in this case carboniferous sandstone. That is the definition[7] of fracking but Europa uses the term "proppant squeeze" which does not have a dictionary definition and appears to be a recently introduced term - largely by Europa.

Europa, in my opinion, disingenuously describes the process that it plans to hydraulically fracture sandstone to allow greater gas flow rates as a "proppant squeeze" and claims that this is not fracking and that "We will not be carrying out fracking at Burniston at any time neither in this application or any future applications.[8]" We have seen much correspondence between our local Member of Parliament, Alison Hume and various government secretaries of state, departments, ministers and officials - some of it informative. Whilst Ms Hume is clear that Europa is planning to hydraulically fracture the rocks underneath our coastal communities ("If it walks like a duck and quacks like a duck ….") it's fair to say that ministerial responses drawn up by their officials are often confused and irrational. The term "proppant squeeze" has no definition that I can find but, fortunately, the Minerals and Waste Plan provides clarity in its definitions in section 5.124 (f):

"For the purposes of the Plan 'hydraulic fracturing' includes the fracturing of rock under hydraulic pressure regardless of the volume of fracture fluid used."

The government announced moratorium on fracking in November 2019 followed public concern about the induced seismicity (earthquakes caused by hydraulic fracturing) at gas exploration sites in Lancashire and elsewhere - notably Preese Hall near Blackpool and Preston New Road, also near Blackpool. Paragraph 5.122 of the MWJP (page 88) refers to:

"An interim report by the Oil and Gas Authority into the 2018 seismic activity at Preston New Road concluded that, on the basis of current evidence, it cannot evaluate with confidence whether a proposal to resume hydraulic fracturing in the area, or to start operations elsewhere, will not cause unacceptable levels of seismicity."

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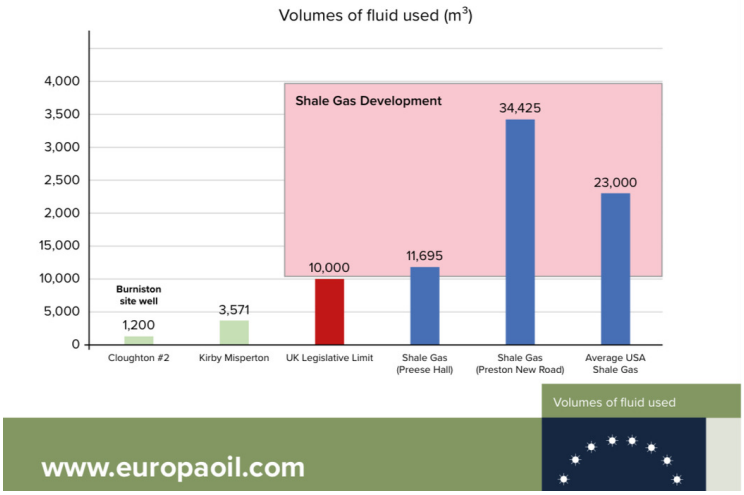
[7] Oxford dictionary definition - the process of forcing liquid at high pressure into rocks, deep underground, in order to force open existing cracks to extract oil or gas.

[8] Pre-application public relations meeting in Burniston Village Hall on 26 September 2024, Europa presented a series of poster displays including No 7 - Are you fracking?

Note that the reference to *hydraulic fracturing* did not specify volumes of fluid but simply stated that uncertainty exists about fracking induced seismicity.

As is often the case, the moratorium was not quite what it seemed because it has since been 'clarified' that fluid volumes of less than 10,000m3 are permitted and is described in various quarters as low volume fracking. The problem is that the volumes of fluid used at Preese Hall and Preston New Road that resulted in seismic activity was smaller than the 1200m3 proposed by Europa in their EIS screening request. Following the Burniston Presentation, the independent industry website Drill or Drop reported[9] on key points from the Europa Presentation and comments from local people. A graph from Europa Poster 7 comparing volumes of fluid used (m^3) for Preese Hall and Preston New Road with that intended for the Cloughton/Burniston site is shown below:



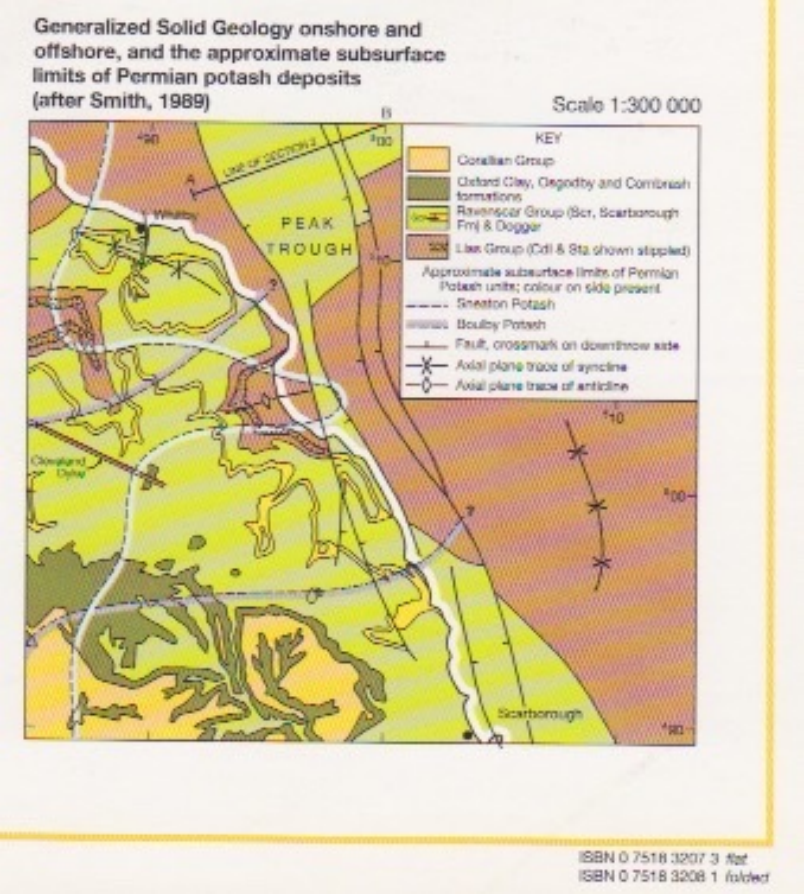
The graph shows that fracks at Cuadrilla's Prison New Road shale gas wells used 34,425m^3 which, as Drill or Drop reports *"was incorrect as a total of 3,869m3 in 17 fracks in 2018 and 2,485m3 on seven main fracks and one mini frack in 2019.* (Emphasis in red from Drill or Drop.) *The volume of fluid used in individual fracks at Preston New Road ranged from 2.5m3 to 472m3. Despite this, the operations caused multiple small earthquakes, including a record-breaking seismic event on 26 August 2019. This led to the immediate suspension of fracking at Preston New Road and the later moratorium in England."*

Europa told Drill or Drop that the chart showed the volumes that operators *planned* to use at Preston New Road and other sites. However, Europa have not taken the opportunity to correct any mistakes made in their presentation to the residents of Burniston and Cloughton. The graph shown above is a screenshot from their website.

The company told Drill or Drop that "*a proppant squeeze at the Wressle oil site near Scunthorpe in 2021 had not seen any seismic activity and Europa blamed geological faults for the Preston New Road earthquakes. It said that there was no evidence of fault patterns at Burniston."* As Drill or Drop reported in the same article "*the Wressle proppant squeeze used 146m3, just over a quarter of the fluid volume that could be used in a single operation at Burniston. The Burniston proppant squeeze needs to use more fluid because the sandstone in the area yields gas less easily than at Wressle, the company said."* That was the story during the EIS screening request and it is interesting to note that the fracking volume has decreased from 1200m3 to 300 to 500m3 which is still more than that used at Preese Hall and Preston New Road that caused seismic activity leading to a moratorium. Of course, all planning applications should be determined on their merits and the final decisions for the fracking/proppant squeeze process would be the responsibility of other regulators but the fact remains that Burniston is in a complex geological area with a major fault, Peak Fault, breaking the surface at the junction of South End and Coastal Road which is approximately 700m distance from the gas well site.

[9] Drill or Drop - Burniston drilling meeting - 27 September 2024

I am not a geologist but it is fair to point out to Europa that Peak Trough runs alongside the proposed drilling site and Peak Fault extends to at least Burniston and possible beyond. The geology of this part of Yorkshire is complex and nobody can say with certainty that there are not as yet unknown faults in the area. It therefore cannot be said, with certainty, that hydraulic fracturing is safe in Burniston. The discovery of the faults at Preese Hall and Preston New Road that led to the unexpected seismic activity occurred after the earthquakes and were unknown before fracking started, despite a 3D seismic survey.



British Geological Survey showing multiple faulting in and around the Cloughton Gas Field.

Europa recognises that the Cloughton sandstone formation is tight and proposes hydraulic fracturing to enable higher gas flow rates. Again, the MWLP 5.124 provides a definition of ‘Conventional hydrocarbons’:

> *d) ‘Conventional hydrocarbons’ include oil and gas found within geological ‘reservoirs’ with relatively high porosity/permeability.*

The term ‘conventional’ is normally applied to reservoir gas resources with ‘high porosity’ whilst ‘unconventional,’ using fracking, is normally applied to shale resources. The latter is subject to a moratorium. Perhaps the MWPA should consider a third term - ‘hybrid’ to describe conventional extraction using hydraulic fracturing (fracking) of low porosity sandstone reservoirs like Europa’s proposal.

Fracking is an emotive subject, and is strongly opposed by the British public. This opposition is caused, to some extent, by efforts of governments and the oil and gas industry, including Europa Oil and Gas, to attempt to disguise their activities with euphemistic phrases such as “proppant squeeze” instead of accurately describing their activities as hydraulic fracturing - fracking. The public aren’t fooled, don’t want fracking and will peacefully oppose it.

In my view, the precautionary principle in para 5.110 of the MWLP (page 83) should be applied because the risk of fracking induced seismic activity is unknown.

The evidence that I have provided above shows that low volume hydraulic fracturing has caused seismic activity at sites in the UK and that the definition of 10,000m3 for high volume hydraulic fracturing is confused and irrational. Proppant squeeze is hydraulic fracturing which has caused earthquakes and could do so at the Burniston site and **the application should be refused.**

5. Negative effects upon neighbouring villages and communities

The imposition of large scale industrial processes into a Heritage Coast and agricultural environment has been dealt with in 1 to 4 above, but we should never forget the impact that this development could have upon the neighbouring houses and village communities. The main additional impacts would be transportation (together with associated traffic hazards), noise, air and water pollution (including possibly radioactive waste - NORM) and the consequence of 'flaring' upon the dark skies. As the DESNZ document Building the North Sea's Energy Future (4.1.3 Onshore licensing) recognises - 'Onshore production '*can also be more disruptive, as it takes place close to people's homes*.'

Burniston is a quiet and peaceful village community whose history goes back to Saxon times. It is bisected by sometimes heavy traffic, particularly at the heights of the busy tourist season but local residents can find peace and quiet by leaving the main roads and accessing the many paths and tracks that lead towards the coast and unspoilt hinterland or just by sitting in their gardens and listening to the birds. The Europa application could end all that - particularly for those who are the closest to the application site. These impacts will be felt in varying degrees throughout the local village communities from Falsgrave through Newby and Scalby to Burniston, Cloughton and beyond.

The MWLP Policy DO2: Local amenity and cumulative impacts deals with the amenity impacts upon the local community in particular, but also the wider village communities.

Traffic and transportation	Dealt with in more detail in 7 below:
Noise	There are several potential sources of noise: a) traffic noise b) site noise c) drilling noise d) fracking noise.
Air pollution	Flaring and diesel fumes from site construction, transportation and drilling activities
Water pollution	Although there will be some flowback at the fracking stage an undisclosed proportion of the fracking fluid will remain underground with uncertain destinations.
Flaring and dark skies	Policy DO6: Landscape 3) Landscape, tranquility and dark skies. See the photo of the aurora borealis taken on 11 October 2024.
Vibration	Seismic surveys of the type that will need to be carried out by Europa prior to fracking has, in the past, caused walls to fall down on farms in the area.
Odour	Flaring and diesel fumes as well as an increased intensity of site HGV traffic could contribute towards odours to the detriment of the enjoyment of their houses and gardens by local residents.

Emisions to air, land or water	The application site will produce emissions. The question is how much, how will they be independently monitored, how will local people be made aware of any increases and how will Europa mitigate the risks to local communities?
Visual intrusion	The 30m exploration and drilling derrick will cause visual intrusion when viewed fro the Cleveland Way, Cinder Track and NYMNP.
Site lighting and flaring	Flood lighting and flaring may cause problems for wildlife and will impact upon the MWLP dark skies policy DO 6 (3) dark skies - see photo of aurora borealis on the next page.
Earthquakes and tremors	See Chapter 4 above dealing with the potential effects of hydraulic fracturing of rock (fracking) on earthquakes and tremors.
Effects on opportunities for enjoyment and understanding of the special qualities of the National Park, Heritage Coast, SSSIs and the network of paths and tracks that surround the site.	See Chapter 2 above examining the consequences of the gas well on the quiet enjoyment of people walking the Heritage Coast , coastal paths and NYM National Park as well as the quiet enjoyment of local people in their own houses and gardens.
Cumulative effects arising from one or more at a single site and/or a number of sites operating in the locality.	The Europa application is for gas exploration, but there is little doubt that their intention is to develop the site to production of gas with more drilling, fracking and further sites to the North and West of the site. This would be unacceptable.

Aurora Borealis taken from Bridge Close, Burniston on 11 October 2024 - c 500m from the fracking site. What effect will flaring and site floodlights have?

The Europa proposal would have a severe impact upon the well-being of near neighbours who will lose the quiet enjoyment of the unspoilt coastline and National Park as well as their houses and gardens. **The application should be refused.**

6. Potential impacts on tourism

The economies of Scarborough and the North Yorkshire Coastal communities relies to a large extent upon visitors and the tourism industry. Visitors are attracted by the North York Moors National Park and the Heritage Coastline which extends North from Scarborough towards Whitby and beyond. According to a North Yorkshire CC analysis[10] of the importance of domestic tourism to the local economy in North Yorkshire in 2019, tourism accounts for approximately **11% of the overall economy and 14% of all employment.** North Yorkshire is ranked as No. 5 in the top tourist destinations in England and the report concludes that "tourism will remain a crucial part of the North Yorkshire Economy now and in the future."

Why people come to Scarborough and how they contribute to the local economy is not something that can be considered in depth in this planning objection. The point is made that tourism is important and anything that endangers that must, at all costs, be avoided.

Europa Oil and Gas, during their Burniston presentation showed a poster labelled 'Benefits' and listed the suggested economic benefits if their application is approved. They acknowledge the temporary nature of gas exploration (whilst omitting that we could be looking at a 20 year project) and that many of the jobs are specialist, but 'some jobs' will be created in areas such as construction, catering, security and support services. There is no indication of the number of these jobs or their duration and nothing at all about training of local people. Countering that, there is no mention at all about the impact upon the local tourist industry and the loss of amenity value to the Heritage Coast could have upon the local tourist industry.

The Europa Planning Statement (page 20) lists in more detail the employment opportunities claimed for the gas field development and acknowledges that nearly all employees will have specialist gas industry skills as either engineers or operatives. *"The proposed development will also support local businesses such as electricians, pipework fabricators, construction companies, crane suppliers, road hauliers to name but a few."* There is also a suggestion that "*local restaurants, cafes, pubs, food stores and petrol stations would also benefit."*

Reference will be made in Section 8 below (Effects upon wildlife and ecology) to the potential negative effects on the natural environment if the Europa Oil and Gas application is approved. The consequences for the ecology and wildlife are unknown and could last for twenty years or more. There is no doubt that much of the local tourist industry depends to some extent upon the quality and diversity of the natural environment, whose economic benefit is far greater than the claimed (temporary and unskilled) employment that could arise from the Europa Oil and Gas application.

The risks to the local tourist industry of large scale industrial development on the Heritage Coast are unknown and have not been either recognised or addressed in the Europa application. The risks to the local economy are potentially high and the precautionary principle should apply and **the application should be refused.**

7. Increased HVG traffic with additional risk of accidents, noise and traffic fumes

Europa Oil and Gas include a detailed traffic assessment in support of their planning application. Residents were and remain very concerned by the number of HGV movements associated with the exploration phase of the development - 1154[11] over the 37 weeks planned. Of course, that does not include any further vehicular activity should the gas exploration site move on to a production site for, it is estimated, 20 years.

The MWLP Policy DO3 refers to Transport of minerals and waste and associated traffic impact. This does not, in my view, fit neatly into this planning application because the issue here is not the transportation of minerals (gas) as this will be done by connecting to the existing gas pipe

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[10] The visitor economy in North Yorkshire and the impact of Covid-19 NYCC

[11] The Europa Oil and Gas presentation is unclear - is a HGV movement just in one direction or a return journey. Should Europa Oil and Gas refer to 2108 HGV movements?

network under the Cinder Track. The more significant impact (perhaps literally) is the increased likelihood of traffic accidents.

Local residents are already concerned about the traffic congestion on the roads from Falsgrave to the site which is proposed to be along Scalby Road, through Newby and Scalby before a sharp right hand turn onto the Coastal Road. The site itself is already a cause for concern with large vehicles turning into a narrow entrance on a difficult bend.

The traffic assessment relies on Google maps Street view images to propose two preferred routes and state that most traffic will arrive at site from the south but it is not clear whether HGV traffic to the north through Burniston and Cloughton will be banned.

It is not only the inevitable increased risk of accidents (important though that is) but the additional noise, fumes and damage to roads that will be a consequence of the exploration phase, made worse should the development move onto a production stage lasting 20 years. How can any of that be justified when the gas produced will account for a tiny and declining proportion of our national demand, will contribute to global warming and severely impact the wellbeing of their neighbouring communities.

An extraordinary omission from the traffic assessment is any recognition that the proposed routing of HGV traffic crosses at least twenty, by my count, walk to school or college routes. How can a traffic assessment be described as robust if it does not even recognise the increased dangers of road traffic accidents to school age children? There is also no recognition of the number and siting of homes of elderly people, many with reduced mobility or sensory loss, who would also be at increased risk from road traffic accidents.

Any increase in traffic must inevitably lead to an increased risk of accident to other road users. In my view, this increased risk - especially to pedestrians, cyclists and children is unacceptable and **the application should be refused.**

8. Effects upon wildlife and ecology

Policy D07: Biodiversity and geodiversity of the MWLP has been developed from the government's NPPF which requires "*protection and enhancement of biodiversity by 'minimising impacts and providing net gains where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."* North Yorkshire Council "*is working with many local and regional interested parties producing a Local Nature Recovery Programme.*"

The Europa planning application includes a supporting document - Preliminary Ecological Appraisal. The appraisal appears to be a mainly desk top study but also includes a field visit on 17 June 2024. I have to say that I found the scope of the appraisal to be very limited because it confined most of its work to the impact on the gas well site and appeared to pay little attention to the importance of the surrounding area to wildlife and ecology.

The wider hinterland of the planning application site includes the Heritage Coast and North York Moors National Park with links (I'm sorry for the repetition) through National Trust coastal sites towards Robin Hoods Bay and Whitby. It is, without doubt, a special place for the people who are fortunate enough to live here but also the many visitors who take time from their normal routines to experience the joys of nature and the countryside. It is also a special place for wildlife.

At different times of the year, notably spring and autumn as the conditions change in northern climes, we frequently observe sometimes vast skeins of geese and other migratory birds, either flying north as the seas warm, or south to seek shelter from arctic conditions. The Heritage Coast is also on the migratory route of large raptors flying north or south depending, again, upon the seasons. I have personally observed a family of four buzzards soaring the thermals above Bridge Close and the inquisitive eye, accompanied by some patience and fortune, can spot many mammals, amphibians and insect species. Local gardens have hosted RSPB and BBC Big Garden Birdwatch wildlife surveys over the years and local children have developed an abiding

love for and interest in the environment and nature. There are numerous organisations and groups who take a close interest in the wildlife and ecology of the area surrounding the application site - some examples are shown in the table below:

Yorkshire Wildlife Trust	www.ywt.org.uk	Protecting wildlife in Yorkshire
Yorkshire Coast Nature	www.yorkshirecoastnature.co.uk	Focusing on nature and supporting conservation
Scarborough Birders	www.scarboroughbirding.co.uk	Avian wildlife observation
RSPB	www.rspb.org.uk	Charity for the conservation of birds and nature.
Wildeye	www.wildeye.org.uk	Inspiring art and nature programme celebrating the North Yorkshire Coast's remarkable wildlife and marine environment.
Scalby Beck	www.scalbybeck.co.uk	Provides information re Scalby Beck - a popular beauty spot.
BirdForum	www.birdforum.net	Birding around Scarborough
eBird	www.ebird.org	Advancing science and conservation
Steve Race Wildlife Photography	www.steverace.com	Award winning professional wildlife photographer
Yorkshire Marine Nature Partnership	www.yorkshiremarinenaturepartnership.org.uk	Conservation and protection of marine wildlife.
North Yorkshire Council	www.northyorks.uk	Protection and enhancement of nature and biodiversity.
North York Moors National Park	www.northyorkmoors.org.uk	Conservation and protection of NYMNP wildlife.

What does all this point towards? The first conclusion must be that there is a great deal of interest in the wildlife and ecology of the application site and the local area and the reason for this interest is the diversity of local wildlife and the importance of the coastal area to regional and national ecology.

About Scarborough

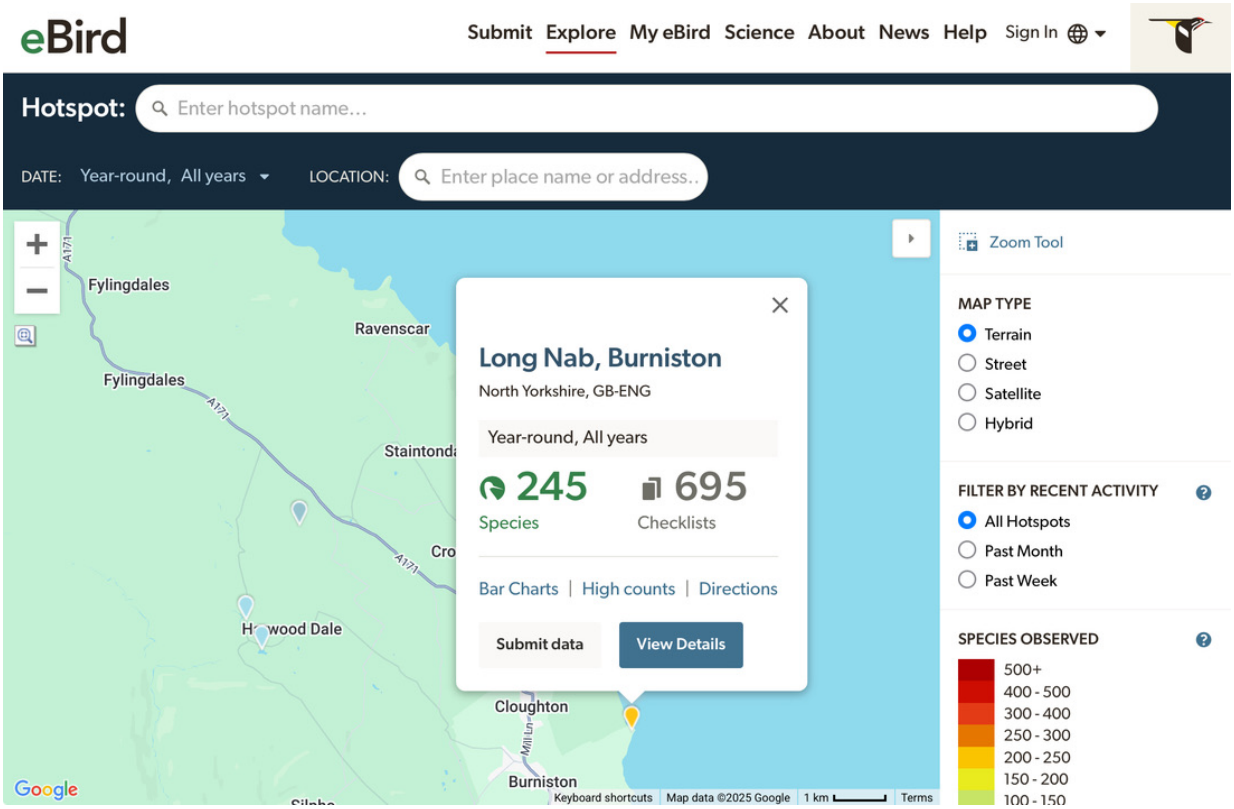
Scarborough is another great place for sea-watching. From the hide at Long Nab, to the north of the town, **shearwaters**, **skuas** and **divers** can be viewed in autumn and winter. **Sandwich**, **Common** and **Arctic Terns**, and even occasionally **Roseate Terns**, use rocky Cromer Point as a roost.

The Sewage Works is a magnet for waders and ducks while Scalby Lodge attracts migrant warblers and other passerines, sometimes turning up a rarity.

Scarborough Harbour is excellent in winter for **Purple Sandpipers** and **Turnstones** and the occasional **Glaucous** or **Iceland Gull,** while divers are commonly seen offshore. Scarborough's south side often attracts **Mediterranean Gull.**

Yorkshire Coast Nature - www.yorkshirecoastnature.co.uk

Reference is made to The Sewage Works - ‘a magnet for wildlife and ducks’ and Scalby Lodge ‘attracts migrant warblers and other passerines.” The Sewage Works reference takes some interpreting as it refers to a pond which has been created on Duchy land just to the NE of the site and the Scalby Lodge reference also refers to a pond to the east. Both are immediately adjacent to the Cleveland Way coastal path. To the north of the application site is the former Coastguard lookout point at Long Nab which has changed its purpose and is now an observation point for Scarborough Birders.



eBird species data for Long Nab bird observation hotspot - www.ebird.org

The Long Nab former coastguard observation point shows a total of 245 species of birds have been observed over the years and the ‘View Details’ button shows detailed lists for all species observed on a month by month basis. Another observation hotspot is Johnson’s Marsh (Grid Ref: TA 023914), which is situated just off the Coastal Road opposite Scalby Lodge and close to the Scarborough Camping and Caravanning Club site. This was created by Scarborough Birders as part of the NYMNP Leaders Programme and is listed in its ‘Top 5 Wildlife Projects.’ Observers at this site have listed 99 species, with 25 listed for this month alone. it is one of the few places that a siege[12] of herons can be observed. Few visiting this site today would recognise that this is the site of a disused waste disposal site and is an exemplar of how the natural world can survive given a little help from local and national government.[13] All three of these avian hotspots are close to (800m to 1km) to the application site.

The point has been made that the Heritage Coast is an important natural environment for resident and migratory birds and is an important link between routes from the south (e,g, Bempton RSPB) to the north. But the coastal area and the adjacent seas are not only important to birds, but mammals, reptiles, amphibians and insects species. The trees, hedges, ponds and tracks in the locality combine with the coastal fringes to provide through routes and connecting corridors that

[12] The collective noun for a group of herons is a siege. No - I didn’t either.

[13] NYCC, NYMNP, NYM Coast and Hills Leader Programme, Dept. for Agriculture and Rural Affairs, The European Agricultural Fund.

enable wildlife to move through the countryside as they pursue their own interpretation, as we all do, of the purpose of their existence.

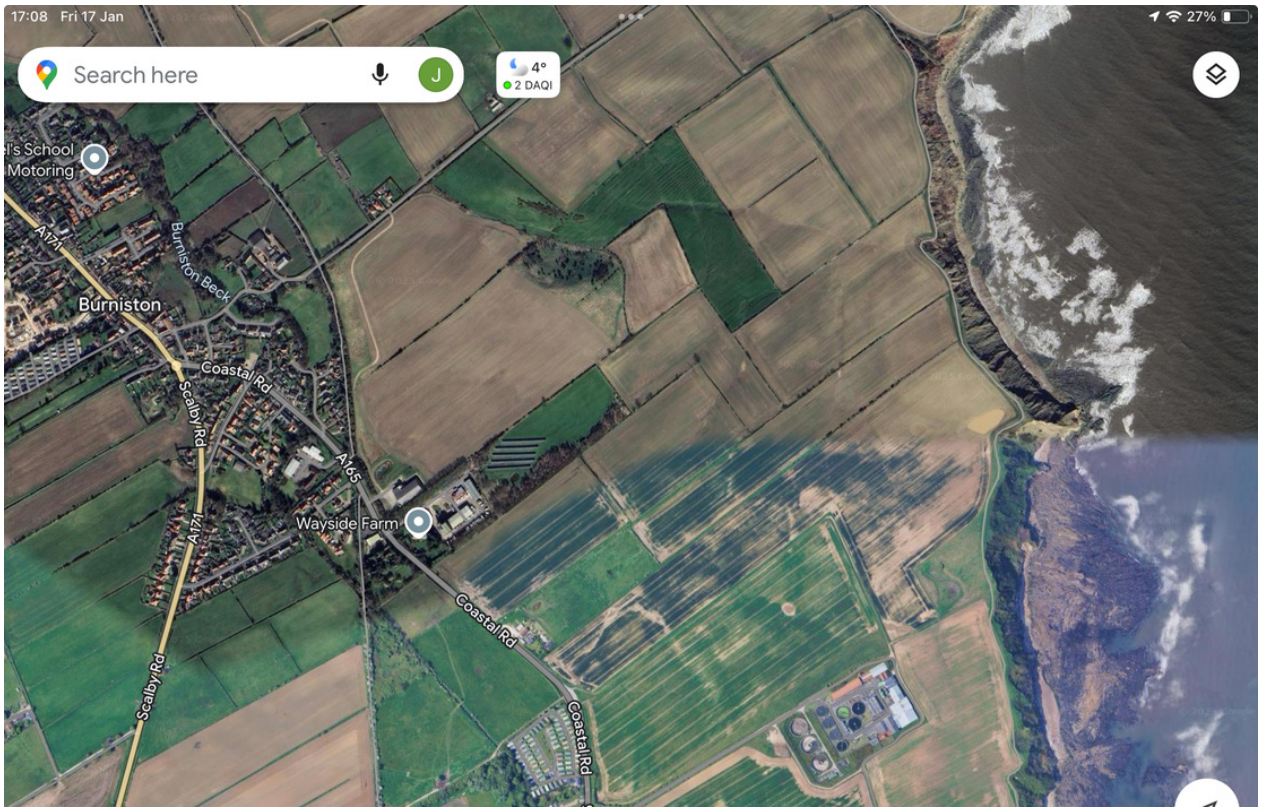
Further away, we have colonies of seals, frequent visits from schools of dolphins and our local economy is starting to benefit from whale watching as these magnificent animals are becoming more frequent visitors. There is a seal colony at Ravenscar and we have even had a visit from a walrus![14]
The Preliminary Ecological Conditions listed at 3.1 consists of a very limited desk study that lists habitats and species in the surrounding area but is inevitably constrained by the study being office based. The Field Study at 3.2 listed habitats ranging from other woodland, grasslands, hedges and other standing water. Limited bird species (Feral Pigeon, Robin, Lapwing, Wren and Blackbird were observed. This is surprising as many more species have been observed at the Long Nab Observation point and the various ponds and other habitats in the area (page 17 above.)

The Europa Oil and Gas interpretation (Screening Opinion NY2024/0113/SCR 1 August 2024) of the Existing Environment (Baseline) for the application site and notes that '*there are no international designations within 1 km of the site but refers to the Scarborough to Whitby Railway Site of Importance for Nature Conservation (SINC) - 360m to the west*.' The SSSI is 800m to the east.

Europa state that '*the Council's ecology officer confirmed that there are no ecological designations on the site, although semi natural habitat is present which may be of higher value than the surrounding arable land*.' The term 'arable land,' whilst accurate, seems to imply that the surrounding 'arable land' is an ecological desert, which cannot be further from the truth.

The application site now known as The Mill Yard is an isolated parcel of land that is shown in the Burniston Enclosures map of 1771 as being allocated to John Hodgson (Yeoman) and William Hodgson (Farmer.) The land has undergone many changes of ownership since then (which is not a planning consideration) and today is surrounded by arable land which is part of the Cloughton estate, which in turn is part of the Yorkshire Survey of the Duchy of Lancaster. For many years, the Mill Yard was part of a pig farm and is now, it is believed, a mill producing animal feed with a scattering of small businesses, storage for caravans and a Coastguard Depot.

The Duchy of Lancaster is a private estate owned by His Majesty, The King, who is known for his life long commitment to the natural environment. The term 'surrounding arable land' does not adequately describe the totality of land use and the ecological diversity that has been encouraged



by The Duchy Estate and enthusiastically undertaken by the farmer. The Ordinance Survey map does not contain the full story so I have shown a screenshot of Google maps on page 16 below:
Google Maps satellite image of part of the Heritage Coast 17 January 2025
The application site can be seen to the centre of the screenshot with the existing solar panels to the south west and the sewage works to the south east. The Cleveland Way can be seen to the east following the cliff tops with the sea below.

Europa Oil and Gas describes the surrounding farmland as 'arable' but this term does not explain the full story. For example, go to the northern corner of the application site and zoom in - it can be seen that within a few metres of the site, there is a large piece of land that has been dedicated to providing space for nature diversity. Trees have been planted and the view from the gate on Field Lane (at the top of the screenshot) provides attractive views of a gentle valley in a natural setting and important corridors for wildlife of all descriptions using the hedges that link the whole area together. Now look to the north corner of the Sewage Works and go a just a little to the north east. It is not easy to see on this image but a wildlife pond can be seen quite clearly (TA 027925) on the ordinance survey map. This pond is the 'Sewage Works' site referred to in the Yorkshire Coast Nature (YCN) explanation of Scarborough on page 13 above. To the North East and out of view is the Long Nab observation point referred to in the same YCN screenshot and which has recorded 245 species of birds. At the bottom of the screenshot, in the middle, is one of two adjacent caravan sites which contribute to the economy of Scarborough. To the south, and out of view is Scalby Lodge with several cottages that are part of the Duchy Estate and features local wildlife and nature conservation. Barn owls nest on the site and the pond, which was also featured in the Yorkshire Coast Nature screenshot, is just to the east of the site. Adjacent to Scalby Lodge is Johnson's Marsh and the Scarborough Caravan and Camping Club site is nearby. The Cinder Track runs from south to north (to Whitby) and Burniston Beck flows from north to south until it reaches the confluence with Scalby Cut (changing its name to Cow Wath Beck on the way.) Both, along with the coastal cliffs and network of hedges are wildlife highways that connect north to south and east to west. Many of the fields follow the same pattern as shown in the 1771 Burniston Enclosures map referred to earlier and have benefited from generations of care and custodianship. The secluded tranquility of the application site is an essential component of the wildlife corridors that are a feature of the Heritage Coast providing hidden spaces. Even the access track and Mill Yard, especially at night for nocturnal animals, provides a wildlife link across Coastal Road to Burniston Beck and the Cinder Track acknowledged as important habitats.

We should commend the efforts made by the five generations of farmers who have done so much to create a Local Nature Recovery Programme (see NYC Policy - 1st paragraph of this chapter). This was started, it should be noted, before humanity recognised the damage to the natural environment that had been done in the name of progress. Amongst the initiatives that have been carried out are:

1. 15 acres of land has been taken out of arable cultivations and a Wildlife Corridor (natural regeneration) has been created adjacent to the Cleveland Way and SSSI.
2. 5 acres of Field Corners have been left (natural regeneration) for birds & animals to nest, feed, and use as undisturbed habitat.
3. 3 acres of arable land is sown each year with a pollen and nectar mix for insects and bees.
4. 25 acres is sown with an over-winter feeding mix for birds.
5. 50 acres of over winter stubble is also left for winter feeding of birds and animals.
6. There are approx. 10 miles of good, thick, mature hedges on the farm.
7. 20 acres of woodland has been planted in the past 15 years and future projects are in hand.
8. Working with local wildlife and conservation groups, the farming family have also created various ponds within the area.

The farmer informs me:

"It is our intention to increase this conservation work (hopefully to double it) through the Sensitive Farming Initiative being encouraged by DEFRA over the next few years."

The Scarborough Apiary is located opposite Scalby Manor at Grid Ref: TA 02947 90903 and the farm also has 15 bee hives in a field just north of the intended drill site at Grid Ref: TA 01761 93496. Bees travel up to 3 miles to collect pollen & can be affected by pollution.

The application site, though small, is an important link in the network of tracks, hedges, ponds and the coastal fringes. Take the site away and it could have unknown consequences for wildlife and nature. Replace the tranquil nature of a rarely visited (by people) field with 24/7 industrial activity, with inevitable traffic, intense human presence, noise, pollution, flaring and floodlighting that could continue for twenty years or more is a risk too far and could have irrevocable impacts upon the natural environment. Why take the risk of placing that heritage in jeopardy for the benefit of private profit? There's nothing wrong with private profit but at what cost to the environment? There should be an ethical dimension to profit but, of course, that is not a planning consideration and it is fair to say that the oil and gas industry has not always been closely associated with high ethical standards.

To the south west of the application site is Wayside Farm Cottage - which is immediately next to the access road that will have over a thousand extra HGV movements in addition to the existing traffic. Of course, the additional non-HGV traffic is not mentioned by Europa but will have an impact on the people living at Wayside Farm Cottage as well as the additional air, noise and other pollutants emitted from the site.

Leave Wayside Farm Cottage and walk north along the Coastal Road for 100m or so and you will turn right into Bridge Close - a small community who are enthusiastic about the wildlife in their care. The gardens are regularly visited by badgers, foxes, hedgehogs and numerous small mammals, birds, butterflies and insects. Newts, frogs and toads are often seen and reptiles have been spotted in Bridge Close gardens. Residents feed the wildlife that visit their gardens, particularly during the hard winter months and participate in national surveys including those organised by the BBC and RSPB. Tawny owls are nesting in Bridge Close gardens and bats are regular visitors during summer evenings, whilst kingfishers have been seen along The Beck and, it is rumoured, otters are venturing their return. Burniston Beck and the Cinder Track are adjacent to Bridge Close and provide a super highway for local wildlife and is only 360m from the application site.

Nearby are the other people who will live closest to and whose lives and well-being will inevitably be damaged by the gas drilling, flaring and pollution originating from the application site.

Here we see in vivid detail an encapsulation of the ecology, biodiversity, tourist economy and personal life stories that together are so inextricably linked. Are we really thinking that gas for private profit and which the country does't need and will contribute to already critical greenhouse gases is more important than the wildlife, people and coastal setting that would be at risk should the Europa application be approved?

In my view, the possible effects upon the biological diversity of the Heritage Coast are not worth the risk of changing the use of land to industrial purposes and the **application should be refused.**

Conclusions

I have, in the chapters above, outlined as well as I am able my main reasons for objecting to the Europa Oil and Gas planning application to use fracking to explore for gas. In my view, the risks from this development are unarguable and **I urge the planning authority to adopt the precautionary principle and REFUSE the planning application.**

Yours sincerely

John Buckley