

Mountain Ash  
Staintondale  
Scarborough  
YO13 0EL  
23/3/2025

Amy Taylor- Case Officer  
Planning Department  
North Yorkshire County Council  
County Hall  
Racecourse lane  
Northallerton  
DL7 8AD

Re: Planning Ref No. NY/2025/0030/ENV

Europa Oil and Gas application for appraisal drilling at Burniston Mill Site

Dear Amy,

I am writing in connection with the above Planning Application made by Europa Oil and Gas for the construction, drilling and testing of this site to extract gas through a propanant squeeze process.

Having considered this fully, I wish to object for the following reasons.

**1. The plans do not support the transition to a low carbon future.**

At COP 27 a commitment was made to keep global warming below 1.5 degrees. This would require greenhouse gas emissions to peak before 2025 and reduce by 43% between 2023 and 2030. Furthermore an agreement to transition away from fossil fuels was made at Cop 29.

The plans outline the benefits of extracting from the PEDL 343 area in terms of Uk energy security and argue that indigenous gas extraction will aid the transition to a low carbon economy. It is assumed that indigenous gas has a lower carbon cost than imported gas but this agreement is only valid if the imported gas is not burnt. The reality is the gas that would have been imported will be burnt

elsewhere and hence total global emissions will increase. The effect on the climate occurs regardless of which country the emissions come from.

The proposed development whilst emphasises the benefits of the extraction phase but only considers the harmful effects of the current plans i.e the appraisal phase. It is clear that the appraisal phase without the later extraction phase does not increase energy security or aid transitional to a low carbon economy but increases does increase global emissions by 2408-7054tCO<sub>2</sub>e . It will also release some methane which traps heat within the atmosphere at roughly 84 times more the rate of carbon dioxide.

Furthermore the availability of gas for energy will not motivate the country to develop renewable sources of energy.

Finally it can be argued that by the time the extraction phase is up and running the UK, if it meeting its climate change obligations should have reduced its energy usage substantially and hence the demand for gas supplies should have reduced.

The development would not reduce the price of gas as this is set internationally.

## **2. The plans do not support the growth of a prosperous rural economy.**

The plans indicate that there will be a modest number of jobs at the site. Most of these will not be recruited locally because of the specialist nature of the roles. The plans state “the proposed development will also support local businesses such as electricians, pipework fabricators, construction companies, crane suppliers, road hauliers to name but a few. Local restaurants, cafes, pubs, food stores and petrol stations will also be utilised, so the development thereby supports indirect employment and the local economy” but fail to recognise the negative impact the proposed development will have on the local economy. The local economy relies heavily in tourism with many tourists being attracted to the area because of the quiet peaceful countryside. It can be anticipated that during the proposed development holiday lets in the area will have reduced occupancy and that this will reduce the utilisation of local restaurants, cafes, pubs, food stores and petrol stations by far more than the development will increase it. The cinder track which passes very near the development site is well used by tourists and this usage can be expected to diminish with the adverse effects being experienced by businesses along the whole cinder track. The development will have a negative impact of the housing market in the area.

## **3. The plans will not promote a healthy community.** The proposed development will increase air pollution from its current level. It is recognized that there is no threshold amount of air pollution below which no adverse effects on health are seen. The air impact assessment shows that the

proposed development increases the levels of carcinogenic benzene from 0.28 to 12.1 mcg/m<sup>3</sup> at residential properties near the site and to 10.1 mcg/m<sup>3</sup> on the dis-used railway line path near the site at times. The level of nitrogen dioxide increases from 9.68 to 73.6mcg/m<sup>3</sup> at residential properties and 45.8mcg/m<sup>3</sup> at the path at times. Nitrogen dioxide is associated with increased all cause and cardiovascular mortality. Exposure to air pollution is increased when individuals are exercising and the dis-used railway line is used both by locals and tourists for walking, running and particularly cycling. Some residents in the area may have moved to the area particularly because of its low levels of air pollution, having found higher levels affect their health adversely.

4. **The impact on highway safety and local road network have not been assessed fully.** The effect on traffic on the coastal road has been assessed however traffic leaving the site will pass either a) through the centre of Scarborough via Northway, b) along Scalby Road past numerous schools and the hospital or through Cloughton to the Whitby road. Traffic is already a problem in these areas particularly at the by the hospital with the junction to racecourse road at peak times and the summer months. Furthermore numerous schools are just off Scalby Road so there safety implications with regard to school children. The road through Cloughton is narrow and traffic is frequently reduced to single file by parked cars. Further assessment with regards to traffic in these areas is needed. I am mindful that this was required by the Potash Mine and mitigation was found to be needed. Furthermore increased traffic as well as any effects of any protests with regard to the proposed development will have an adverse effect on the coastguard who are currently based at Burniston Mill
5. **The plans do not contribute to enhancing the natural environment.** The noise and light pollution will detract from the natural environment. There are risks of ground and water pollution. Fine sediment entering the beck from any dust generation may pose a problem for sea trout spawning in the downstream Scalby Beck as fine sediment increases the egg mortality in their redds substantially. Numbers of sea trout in the UK have plummeted over recent decades. In 2023 the International Union for the conservation of nature reclassified Atlantic salmon as endangered. The plans have not assessed the ponds that is within a 100m of the site for great crested newts. Residents in the area know these are present in many local ponds. The proposed development plans to use roundup on any weeds which have developed on the development sites bunds prior to site restoration. The use of glycosphate based herbicide and insecticide carries risks both to human health and bees
6. **The risk from earth tremors and subsidence has not been considered within the plans.** Propanit squeeze is regarded as low volume fracking by the environment agency. Low volume fracking is associated with low tremors. I understand that the frequency of tremors cause by low volume fracking is less than that of high volume fracking but that the severity of any tremors is not reduced. The area is at risk of earth tremors because of the numerous fault lines in the area. Any earth tremors within the area may have significant

effects. The cliffs of our heritage coast are already unstable. Much of the heritage property in the area has no foundations and would be prone to damage by tremors. Furthermore a significant number of properties within the national park close to the proposed development get their water supplies from boreholes and water aquifers can be affected by earth tremors. Subsidence is a known risk of fracking and properties without foundations will be more at risk of this. Hence the plans could affect the cultural heritage of the area.

7. **The implications of the extraction phase have not been considered.** The current proposed development is limited in scope, is short term in nature and is located in one of the few sites within PEDL 343 where the more stringent planning policies would not apply. Most of the area covered by PEDL 343 lies within the national park. Policy M16(b)i) states: "Surface proposals for these forms of hydrocarbon development will only be permitted where they would be outside the following designated areas: National parks ". Extraction sites are likely to be located within the national park. Furthermore the extraction phase will be a long term phase. Policy M16 (d) ii states "surface hydrocarbon development will only be permitted where the undeveloped character of the defined heritage coast will be protected". The proposed development argues that the impact on the heritage coast would not be significant because of the limited time the drilling rig would be on site but this would not be the case for the extraction phase. If the extraction phase would not be granted planning permission then the appraisal phase should be refused given the carbon emissions generated by the project would have been for no ultimate gain and that temporary light, noise and air pollution would have been unnecessary

I hope that my concerns are fully taken into account by the planning Committee during your review process

Yours sincerely,

Dr Colette Broadhurst