

Further objections to application NY/2025/0030/ENV

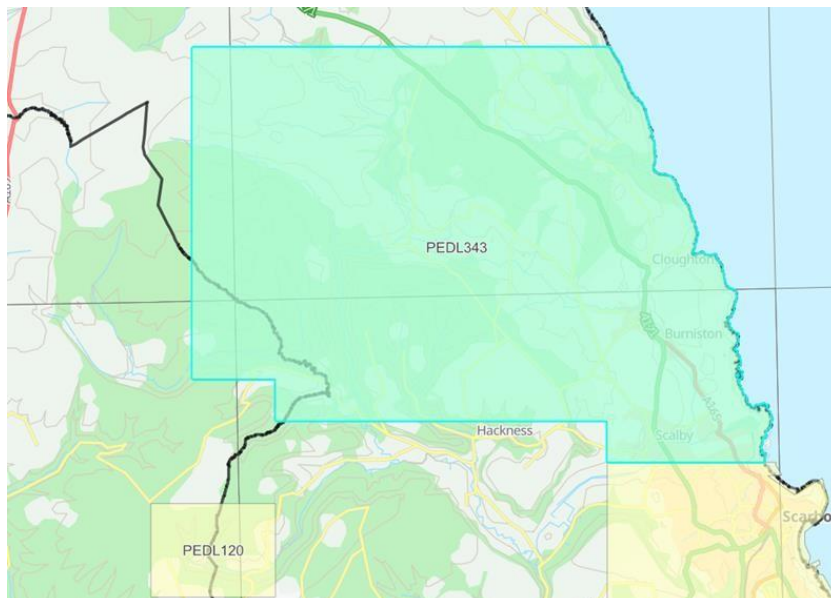
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I urge the planning committee to thoroughly analyse the data and details contained within this planning application and not rely on summary or conclusions sections which often misreport, misrepresent or misinterpret the data.

I have previously identified issues with transport details and data, and recently provided an outline of issues with the air quality report. I have now looked further at other documents contained within the application and draw your attention in particular to the points below.

Issues with the Environmental Statement

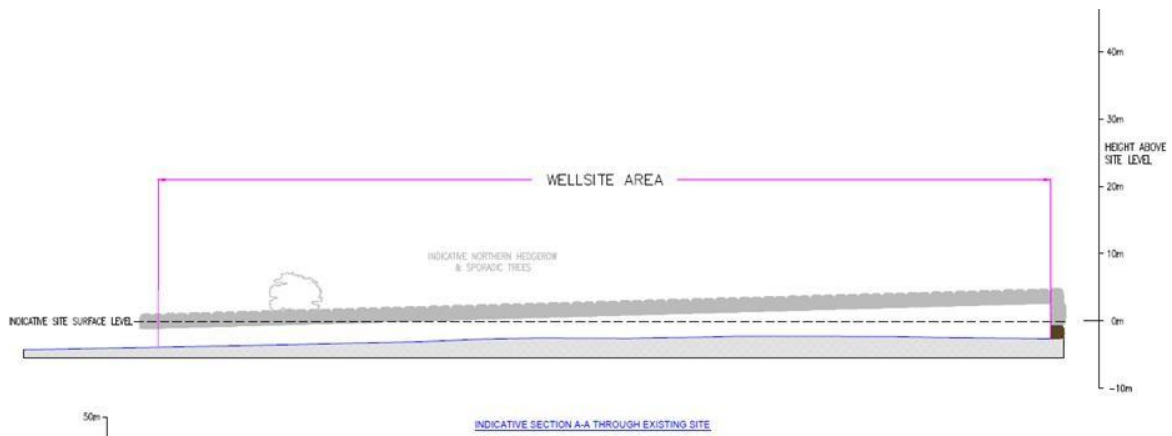
Section 5.4 of volume 1 of the Environmental Statement contains Europa’s perceived justification for the choice of location of the proposed site. The justification given is totally inadequate and fails to demonstrate that they assessed alternative sites properly. The licence area for exploration that they have been awarded (PEDL343) is large (covering 110 square kilometres) and there are many areas that could have been chosen that would not impact the heritage coast. Local tourism or be so close to local residents – see extract from the licence map shown below:



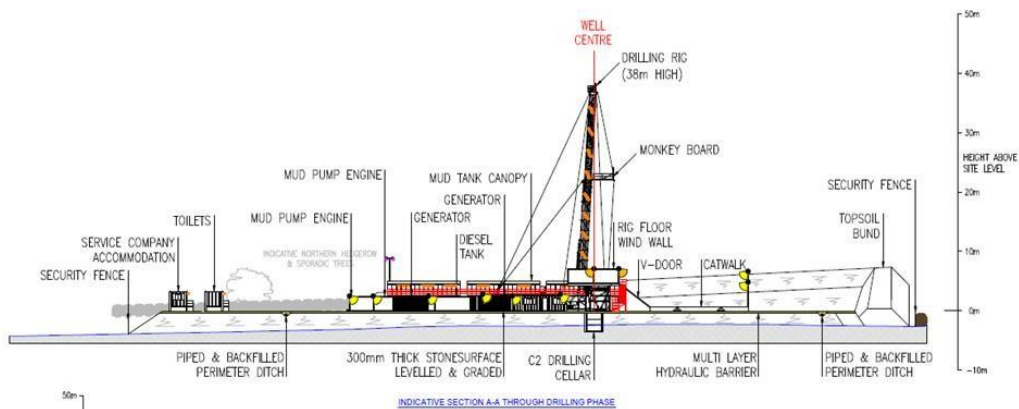
That they have agreement with the landowner for this site is not a justifiable reason for selecting this site over all other areas.

They claim that the development will “not be out of context in relation to the scale of the existing development”. This is clearly wrong as is evidenced by their own documents – see the extracts from the indicative drawings (two different views) submitted by Europa and available on the planning portal:

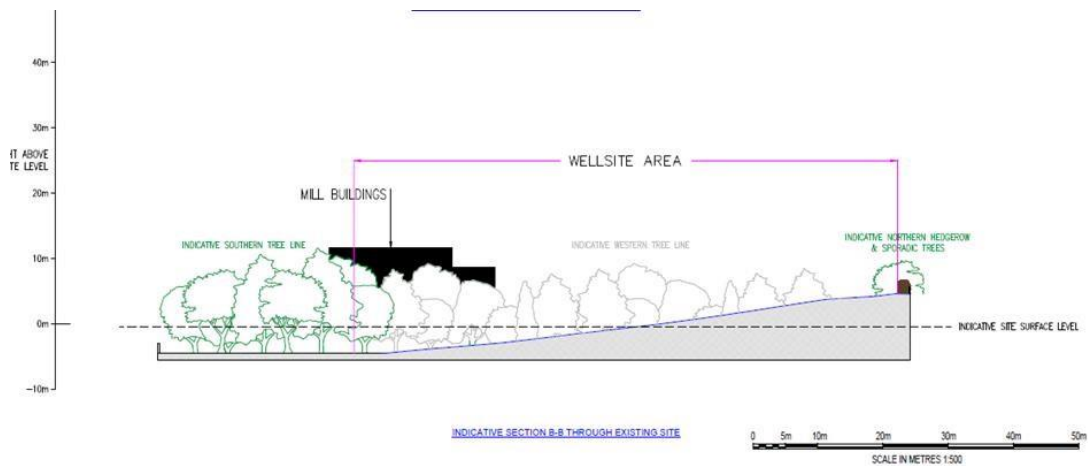
### Current view



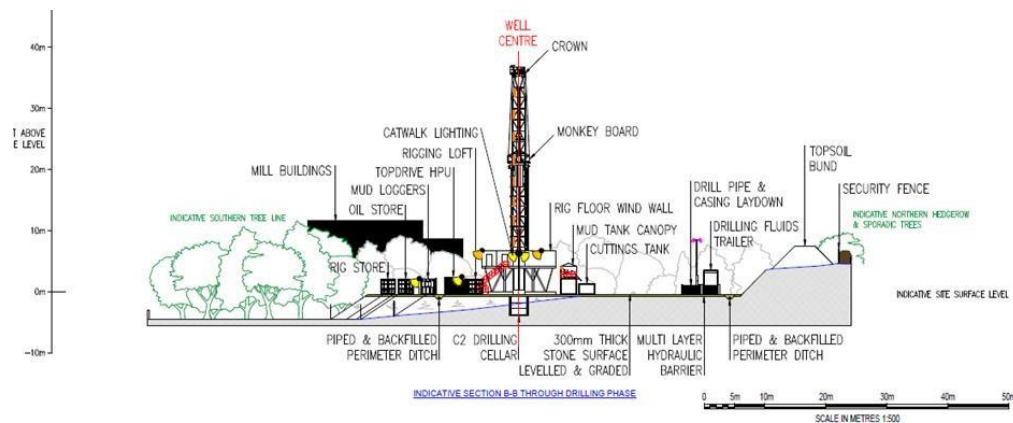
### Same view but with Europa present



## Current view



## Same view but with Europa present



According to the justification supplied by Europa for choosing this site the development will be “well screened from the wider landscape” – as shown by their very own drawings this is evidently not true. They are damned by their own evidence.

Clearly the presence of Europa will have a significant impact on the area and is totally out of character with the locality. This will be a blot on the landscape which will have an adverse impact on local residents and tourism. Tourists adversely impacted will not return to the area which will have a lasting impact on the local economy.

### Issues with the hydrogeological Impact Assessment Burniston Mill – Cloughton (PEDL343) by Hafren water

Section 2.3.3 (PDF Page 19) states that the expected geology for the length of the appraisal well has been provided by the Europa geologist. Interpretation of the deeper geology is critical to this assessment and the potential impacts of leakage or faulting from the drilling

well. As the information has been supplied by Europa, it is evidently not an independent assessment and hence the conclusions cannot be considered to be independent.

The extract below refers to local groundwater abstractions (wells). It's worth checking if the Fields farm borehole mentioned is the one serving the nearby farm or whether there is one that has been missed and which should have been considered in the assessment.

2.4.2 Groundwater abstractions

Licensed abstractions

One licensed groundwater abstraction is located within a 3 km radius of the site. It is 2.36 km to the southeast and is used for 'spray irrigation' at the Scarborough North Cliff Golf Club. The licence allows a maximum abstraction of 3000 m<sup>3</sup> per annum and 70 m<sup>3</sup> per day.

Source protection zones

The site is not within a source protection zone (SPZ) for a public water supply.

Unlicensed abstractions

NYC has no records of unregulated private water supplies within a 3 km radius of the centre of the site. Through local research one unregulated 70 m borehole has been identified located close to Fields Farm at a distance of 1.4 km to the north of the development site.

Section 4 of the report cover the assessment of impacts. This assessment is poor and takes no account of the potential for things to go wrong or for unpredicted/ unplanned events to occur or for accidents to happen. Drilling is a dynamic process and the geology of the actual site is unknown with the only information currently available being from another site. Therefore the assessment needs to include an assessment of impacts for abnormal and emergency conditions to show that these have been considered and appropriate mitigation included in the design. The report should be rejected and the applicant should be required to submit further information including the assessment of the impacts of:

- Accidents and emergencies
- The potential for naturally occurring radioactive materials (NORM) to be present
- Potential for seismic events – earth tremors from the drilling phase and the testing (proppant squeeze) phase

Section 5.2.2 states that three groundwater monitoring boreholes will be installed to monitor the effectiveness of the mitigation measures. Three is too few in number to be able to properly identify any potential impacts – more are needed. In addition minimal details are given on these boreholes and therefore it is not clear whether the boreholes will be screened at appropriate horizons to be able to assess potential impacts on the different groundwater bodies present at the site. The report should be rejected and the applicant should be required to submit further information to demonstrate that adequate monitoring and controls are proposed.

Issues with the Flood Risk Assessment & Surface Water Drainage Strategy Burniston Mill – Cloughton (PEDL 343)” by Hafren water

Section 6.2.2 of the report states that a 1 in 2-year rainfall event has been used to calculate surface water run-off volumes. This data is then used to size the storage tank capacity that is needed for the proposed collection tanks required to prevent contaminated surface water run off from reaching the local drains or contaminated the ground and groundwater. Whilst the perimeter drain is shown on the site layout plan in the appendix to the document, the bunded surface water storage tanks (referenced in section 6.2.1) are not shown. Hence it is not clear whether they are even included in the design of the site which is very concerning!

The use of a 1 in 2-year rainfall event to calculate the size of the storage tanks does not comply with the Scarborough Borough Local Plan 2017 Policy ENV3 – Environmental Risk. This clearly states that runoff generated during a 1 in 100 year storm event, with an inclusion for climate change, must be stored onsite until it can suitably drained or managed. Europa are aware of this planning policy as this report has included this in an earlier part of the report (section 4.2.7) which covers local policies. However they have chosen to ignore the requirement – this action increases the risk pollution and contamination of surface waters and groundwaters. The application should be rejected as it does not provide sufficient protection against a potentially significant pollution risk.