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Amy Taylor - Case Officer Planning Department
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28th March 2025

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 to object to the above Planning Application made by Europa Oil and Gas for the construction, drilling and testing of this site to extract gas through a proppant squeeze process.

There are many aspects of the proposal that I object strongly to, but the two main reasons are:

1. The intention to explore gas with a view to extraction flies in the face of UK Government policy (and the global imperative) to prevent further fossil fuel extraction in the light of the **climate emergency**.
2. The threat to **nature and biodiversity**, both on the site during the work and as a result of future emissions, goes against the UK Government's commitments to nature recovery, and against North Yorkshire's priorities as set out in the draft North Yorkshire Local Nature Recovery Strategy.

Some more detail on these two objections:

1. Threat to climate emergency, contrary to UK government policy:

It is clear from the inclusion in the Planning Statement titlepage ("*Construction of a wellsite and operation of a drilling rig for the appraisal of subsurface hydrocarbons, well testing and retention of equipment*") that there is an intention to move from appraisal to production. As proven in the 2024 Supreme Court judgement *Finch v Surrey County Council*, this application should include in its Environmental Statement the impacts of Scope 3 emissions – the impact of releasing more greenhouse gasses (GHGs) into the atmosphere from the use of the fuel produced.

Globally and domestically the UK is committed (and legally bound) to reach net Zero GHG emissions by 2050 to play its part in keeping global temperature rise below 1.5 degrees C above pre-industrial levels. Working together globally to reduce emissions to a level where temperature rise is limited enough to sustain human livelihoods is imperative. We are already feeling the impact of climate change with increasing flooding, heatwaves, storm magnitude, conflict over resource, climate migration, detrimental impacts on health and mental health, sea level rise, species loss, tundra and glacier loss, desertification, and the damage to the ability of the earth's systems to regulate. Decarbonisation of fuel is a cornerstone of the UK Government's plan to achieve the UK target of net zero by 2050 that contributes to the global effort to mitigate and adapt to a changing climate:

The Labour Party manifesto claims: *We will not issue new licences to explore new fields because they will not take a penny off bills, cannot make us energy secure, and will only accelerate the worsening climate crisis. In addition, we will not grant new coal licences and will ban fracking for good.* (p52)

This is reiterated in the North Sea Energy Future consultation launched in March 2025: *Our approach to oil and gas production in the North Sea needs to support our climate obligations, including the UK's carbon budgets set under the Climate Change Act 2008. We must speed up the transition away from fossil fuels and towards clean energy. The science is clear that the world needs to take urgent action and that current plans for global production of oil and gas are not compatible with limiting global warming to 1.5°C. That's why the government has committed to issuing no new licences to explore new oil and gas fields.* [Building the North Sea's Energy Future: consultation document \(accessible webpage\) - GOV.UK](#)

The latest IPCC (intergovernmental panel on climate change) synthesis report, published in March 2023, agreed by representatives from most of the world's governments, brings together everything scientifically established on the subject over the previous eight years. Its key message is that greenhouse gas emissions from existing fossil fuel infrastructure is more than enough to push the world beyond 1.5C of global heating compared with pre-industrial times. It tells us that no more fossil fuel sources can be opened if the world is serious about living up to its commitments and avoiding a significantly worsening climate crisis. This is not a fringe position. It is a mainstream, globally agreed fact that is supported by nearly 200 countries – which makes the UK position on new fossil fuel exploration outlined above absolutely the right stance.

There are alternatives to fossil fuel that warrant the kind of investment currently being ploughed into oil and gas – we should be directing energy and resource towards developing solutions not exacerbating problems.

This application to explore potential sources of fossil fuels is dangerously short-sighted, catastrophically damaging not only for future generations but current generations, exacerbating threats to life and livelihoods locally and worldwide.

2: Threat to biodiversity locally and globally

This proposal also flies in the face of government efforts to restore biodiversity and enhance nature recovery in two main ways:

Every planned development has to show that it will enhance rather than deplete biodiversity in the area it is working – showing Biodiversity Net Gain (BNG). Or offset this by buying BNG units in another location. The Biodiversity Net Gain statement associated with this planning application shows a BNG increase of 11.05%, units projected to rise from 2.56 baseline to 2.84 after ‘restoration’.

However it is based on a number of assumptions:

1: that the ground is totally flat! P11, para 3.5, Limitations states: *Measurements are based on a two-dimensional mapping and would assume the site is completely flat and therefore certain habitats may be greater in extent if they occur on a slope.* Knowing that coastline very well, I personally would make an assumption that the land is not completely flat.

2: that the work will last about 15 months to ‘full restoration’ (Para 4, p 12). There is no reference at all to the ‘retention’ of equipment’ implying potential move to production.

3: That no trees or hedgerows will be damaged or removed. There is no mention of measures in place to prevent damage or destruction, or about how contractors and subcontractors will be held to account to ensure damage does not occur.

In addition the BNG statement does not include scope 3 emissions - the negative impact on biodiversity worldwide of increases in GHG emissions contributing to global heating is well documented and should be considered.

In addition, the proposal is counter to the North Yorkshire Local Nature Recovery Strategy (NYLNRS). By 2025, every part of England has been mandated by DEFRA to have a Local Nature Recovery Strategy. [North Yorkshire and York's](#) LNRS is due to be published for public consultation in the summer of 2025, but they have already consulted widely with stakeholders, scientists and landowners to arrive at a series of principles and priorities:

The North Yorkshire LNRS vision is: *To work together to enhance, expand, restore and connect our region's habitats for thriving nature across North Yorkshire and York. Our ambition is that by 2035 our sub region will be an exemplar for abundant nature, and we will leave our natural environment in a better state for people and wildlife species, while supporting a prospering economy and addressing climate change.*

For reasons discussed above, it is hard to see how this proposed development can in any way contribute to that vision.

In addition one of the NYLNRS priorities focuses on hedgerows. PriorityFRM_P05 is to: *Expand the hedgerow network; Enhance existing hedgerow structure and diversity through*

encouragement of traditional management practices and hedgerow tree establishment. Expand the network of hedgerows as wildlife corridors and connecting other habitats.

The NYLNRS measures listed for hedgerows include: *Create buffers alongside hedgerows that exceed 2m width where possible. Maximise diversity of these by including woodland flora and ancient woodland indicator species (via seeding and/or plug plants of local provenance*

The BNG statement included in the planning application (para 5.2.3) identifies two extensive mature hedgerows (250 metres and 120 metres long, 2 metres wide) along the northern and western boundaries of the site. These hedgerows are Habitats of Principle Importance (HPI) and: *have potential to be considered 'important' under the Hedgerow Regulations 1997 based on their ecological value, age, structure, condition, and contribution to local biodiversity. The hedgerows provide critical habitat for a variety of wildlife, including birds, invertebrates, reptiles, bats and other small mammals by offering food, shelter, and nesting sites. The mature hedgerows also serve as important corridors for wildlife, helping to maintain ecological connectivity across the landscape. (BNG statement p 15).*

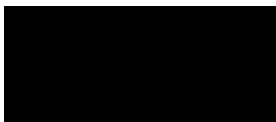
While the planning application states that no hedgerow will be damaged, this seems unlikely if they are on the boundary – and the LNRS priority measures are to create buffers around hedgerows. This priority habitat needs protection and buffering which is unlikely to occur being on the boundary of the proposed site.

This proposal is a threat to both local and global biodiversity, which goes unrecognised in the applicant's Biodiversity Net Gain statement, and runs counter to local nature recovery strategy.

There are many other more locally impacting aspects which I find objectionable, for example around air quality, noise and light pollution, increase in traffic, detrimental impact on local recreational spaces and therefore physical and mental health. But in the interests of brevity I have focused on the two key issues in which I have expertise and that have both local and global concern.

I look forward to hearing from you in response to these points raised, and will be watching developments closely. I very much hope the planning decision upholds common sense, and refuses this destructive and unnecessary proposal.

Yours sincerely,

A solid black rectangular box used to redact the signature of Helen Garforth.

Helen Garforth