

From: planningregister@northyorks.gov.uk
To: [Planning Control](#)
Subject: New comments for application NY/2025/0030/ENV
Date: 29 January 2026 16:56:03

New comments have been received for application NY/2025/0030/ENV from Mr Daniel Nye.

Comments:

To whom it may concern,

I am writing to submit a technical assessment, "Preston New Road: Technical Assessment of Hydrogeological Risk, Monitoring, and Governance Limits" (V1.0, 2026), as my formal objection to any ongoing or proposed onshore shale gas developments in the Fylde Basin, including the Burniston site. As it is too large for the portal I will send by email to planning.control@northyorks.gov.uk

As a concerned stakeholder based in Ireland with a keen interest in cross-border environmental impacts, I have prepared this non-conclusive document to inform decision-making under geological uncertainty. Drawing on primary planning, regulatory, and operational evidence-supplemented by secondary and tertiary sources for corroboration-it applies an assumption-evidence-gap mapping framework to highlight systemic limitations in assumption testing, monitoring design, and governance. Key findings include the foreseeability of non-linear subsurface responses in faulted UK settings, the inadequacy of confirmatory monitoring for detecting unanticipated pathways, and the circularity in regulatory dependencies that deferred responsibility without enabling adaptive responses (see Sections 9-12 and Appendices B-C for practical tools and frameworks).

While the assessment itself maintains a neutral, evidence-based stance without asserting causation or liability, I wish to express my personal opinion, grounded in the facts presented: shale gas extraction is fundamentally unfit for the UK's geological context. As detailed in Section 8.8, UK shale formations like the Bowland-Hodder system are structurally complex, with high fault density, stress states near failure, heterogeneous mineralogy, and strong coupling to shallow aquifers-materially differing from North American analogues and leading to unpredictable fracture behavior, fault reactivation, and delayed pressure diffusion. These characteristics, supported by sources such as the British Geological Survey (2014; 2018; 2019) and Clarke et al. (2014; 2019), render the process inherently ungovernable at scale, posing an unacceptable level of risk to local communities through potential seismic events, groundwater contamination, and surface disruptions. In light of the UK's climate commitments (Appendix K) and the precautionary principle, pursuing such developments would be imprudent and contrary to sustainable planning.

This submission aims to support robust, evidence-informed policy by clarifying these risks and advocating for precautionary safeguards. I welcome any questions, further discussion, or opportunities to elaborate on these points.

Yours sincerely,

Daniel Nye