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5th November 2025

Amy Taylor - Case Officer
Planning Department
North Yorkshire 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 Taylor,

Advice from NSTA on mitigation of seismic risks

I write on behalf of the Steering Group of Frack Free Coastal Communities.

You will be aware that more than one third of representations to the consultation on Europa's planning application expressed concern about potential seismicity from drilling at Burniston and hydraulic fracturing beneath Scalby. Many cited the unexpected earthquakes associated with Cuadrilla's hydraulic fracturing at Preston New Road in Lancashire. Europa's planning application does not address induced seismicity in any of its documentation.

While we recognise that the assessment and mitigation of seismic risk comes within the purview of the North Sea Transition Authority (NSTA), we note that this gives no opportunity for public scrutiny of, nor for consultation on, Europa's Hydraulic Fracture Plan and the geological and seismic data that will accompany it. However, the Minerals Planning Guidance does put a responsibility on Minerals Planning Authorities to satisfy themselves that the mitigation of seismic risks can or will be addressed.

In similar vein, North Yorkshire's Minerals and Waste Joint Plan (at para. 5.154) says, apropos Policy M17, that where hydraulic fracturing is involved 'proposals should be supported by compelling evidence that induced seismicity can be managed and mitigated to an acceptable level. This should include information which demonstrates the known location of any faults and an assessment of the potential for induced seismicity to occur as a result of the proposed development.' Europa have not provided evidence or supporting information with their planning application.

This is particularly important because the NSTA's own research concludes that it is not possible to predict the seismic response to hydraulic fracturing in relation to site characteristics, fluid volume, rate or pressure; and that where induced seismicity has

occurred, mitigation measures have shown only limited success¹. This begs the question of how the NSTA can give meaningful assurances that the risk of induced seismicity from Europa's proposed hydraulic fracturing can and will be effectively mitigated.

We note that the NSTA (under its former name of Oil and Gas Authority) is listed under the 'Consultations' tab on the planning register with a 'due date' of 11/04/2025; however, no consultation response from them is shown under the 'Documents' tab.

In view of the above, we would be grateful if you can confirm what advice you have sought, or will seek, from the NSTA about how the mitigation of seismic risks will be addressed and that their response will inform the report and recommendation to be presented to the Strategic Planning Committee on Europa's planning application.

We look forward to hearing from you.

Yours sincerely,



Professor Chris Garforth

Chair of the Steering Group of Frack Free Coastal Communities

www.frackfreecoastalcommunities.co.uk

¹ Summary report of the scientific analysis of the data gathered from Cuadrilla's PNR2 hydraulic fracturing operations at Preston New Road. <https://www.nstauthority.co.uk/media/6970/oga-summary-of-pnr2-studies-final.pdf>