

Consultation Response to the Environment Agency Environmental Permit Application

EPR/YP3623LC/A001 Cloughton-2 Wellsite

Name

Address

Postcode

Email (optional)

Consultation Response

Dear Sir or Madam,

I wish to object to the Environment Agency's Draft Decision to grant Environmental Permit EPR/YP3623LC/A001 for the proposed Cloughton-2 Wellsite.

I appreciate the work undertaken by the Environment Agency and recognise its important role in protecting the environment and human health. My comments relate only to matters that fall within the Environment Agency's responsibilities under the Environmental Permitting (England and Wales) Regulations 2016.

After reading the Draft Decision Document, I am not persuaded that the statutory tests for granting an Environmental Permit have yet been met.

In particular, I ask the Environment Agency to reconsider the following matters.

1. Too much important information is still missing

The Draft Decision repeatedly states that important documents will only be produced after the permit has been granted.

These include:

- the 3D seismic survey
- the Hydraulic Fracturing Plan;
- updated groundwater monitoring;
- revised Surface Water Management Plan;
- revised Waste Gas Management Plan;

- Leak Detection and Repair Plan;
- confirmation of the final underground mining waste facility; and
- additional geological information.

These appear to be fundamental parts of the environmental assessment rather than minor operational details. I do not understand how the Environment Agency can conclude that environmental risks have been fully assessed when so much essential information remains outstanding.

2. Geological uncertainty

The Draft Decision accepts that detailed fault mapping and geological information will only become available after drilling.

The EA should insist that the long often postponed 3D seismic survey must be carried out and independently assessed before an Environmental Permit should be granted. See Precautionary approach in 6. below.

I believe this information should be available before any permit decision is made.

Without a full understanding of local geology, it is difficult to see how the Environment Agency can be satisfied regarding:

- fracture propagation;
- groundwater protection;
- fault reactivation;
- long-term containment of underground waste.

3. Groundwater protection

Protection of groundwater should be one of the Environment Agency's highest priorities.

The Draft Decision requires additional groundwater investigations and baseline monitoring before operations begin.

If this information is still needed, I question whether sufficient evidence currently exists to conclude that groundwater will be adequately protected.

4. Underground waste

The Draft Decision accepts that between approximately 50% and 70% of the proppant carrier fluid may remain underground indefinitely.

This will create an underground mining waste facility.

I remain concerned that there is insufficient evidence regarding:

- the long-term behaviour of retained fluids;
- the final extent of the waste facility;
- long-term monitoring arrangements;
- future environmental liabilities.

5. Consultation

Many detailed consultation responses submitted by local councils, community organisations and residents appear to have been summarised before being answered through standardised responses.

I am not convinced that all of the technical evidence submitted during the consultation has been fully addressed.

6. Precautionary approach

The Draft Decision identifies numerous uncertainties but concludes that these can be dealt with through future permit conditions.

In my view, where important information is still missing, the precautionary approach would be to obtain that information before deciding whether to grant the permit.

Requested Outcome

I respectfully ask the Environment Agency to:

- reconsider the Draft Decision;

- require the applicant to provide all outstanding technical information before determining the application;
- make that information publicly available;
- undertake further consultation where new information materially affects the environmental assessment; and
- only determine the permit once the Environment Agency can demonstrate that all statutory environmental tests have been fully satisfied.

Thank you for considering my comments.

Yours faithfully,

Signature

Date

Guidance Notes (not to be submitted)

FFCC strongly recommends that you should write your own comments to the Environment Agency using this template (the more detailed consultation response) as an *aid memoir*.

To make your response more personal and therefore more persuasive, consider adding a short paragraph explaining your connection to the local area, for example:

- “I have lived in Burniston for over 30 years.”
- “I run a tourism business close to the proposed site.”
- “My family relies on local groundwater.”
- “I farm land near the proposed development.”
- “I regularly walk and enjoy the Heritage Coast.”
- “I am concerned about protecting the environment for future generations.”

Avoid simply copying someone else’s response word for word. The Environment Agency is more likely to give weight to representations that reflect each individual’s own concerns and reasoning.