

# **BURNISTON** **Parish Council**



## **Response to Europa Oil and Gas Ltd permit application EPR/YP3623LC/A001**

**Cloughton 2 Wellsite  
Coastal Road  
Scarborough  
YO13 0DB**

**Applicant - Europa Oil and Gas Limited, 30 Newman Street London W1T 1PT**

**Date: 6<sup>th</sup> October, 2025**

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## **Introduction.**

Europa Oil and Gas Ltd (EOG) have applied for a bespoke Environment Agency permit to carry out a drilling process for extraction of natural gas at the site of Mill Yard, Coastal Road, Burniston. The drill process particularly affects the villages of Burniston, Newby and Scalby.

This report is Burniston Parish Council's response to the Environment Agency (EA) consultation into the EOG permit application, reference EPR/YP3623LC/A001.

On the 17<sup>th</sup> February 2025 North Yorkshire Council received a planning application, ref NY/2025/0030/ENV from EOG. Burniston Parish Council (BPC) set up a working group to investigate and respond initially to the planning application to North Yorkshire Council, and then to any subsequent related applications. The working group included Councillors from the neighbouring Cloughton Parish Council and Newby and Scalby Town Council.

It is important to note that all documents considered by the working group were scrutinised from a starting position of neutrality. All benefits and detriments were fully considered without bias.

After very careful consideration, each of the Councils unanimously voted to oppose the planning application. Much of the information in the planning application is also relevant to the EA permit application and decision.

During the local council's consultation period an overwhelming number, from both the local and wider community gave their views and concerns. The NYC planning portal has to date received around 1450 comments all bar 7 object to the application for very important reasons.

**Although this response is aimed at the EA permit application from EOG, the EA cannot ignore the overwhelming public response to the planning application. Identical public feeling and concerns exist for the EA permit application and cannot be ignored.**

## **Grounds for objection**

BPC do not have the expertise to fully understand the technical documents submitted as part of the application. We have consulted with and taken advice from members of both our and the wider community, to gain some understanding of the scientific specialties of geology, chemistry and engineering.

BPC are depending on the Environmental Agency, who has access to the relevant knowledge and expertise, to consider the technical aspects of this proposal.

We have consulted with the community that we represent and are mindful of the concerns raised by our local residents together with the local environmental concerns which naturally arise from this proposal.

Much of the mitigation provided as part of the planning application process and the EA permit process has relied upon the temporary and reversible nature of the risks involved in this project.

**Councillors refute this vehemently.**

In discussions with EOG the full extent of their expectations has been openly discussed and EOG expect to be working the Burniston Mill site for up to 20 years.

To support this point on the 18th of September 2025, Will Holland the CEO of EOG delivered an interim reports presentation, the video of which is widely available on 'Engage Investor' via Google. Mr Holland speaks about his expectations of the gas field having a 20 year lifespan and being largely operated from the Burniston Mill site throughout that period.

The potential for the project to last up to 3 years (and up to 2 decades if they move to full operation) is not a temporary situation for our residents. Damage done to our environment may not be reversible.

We have a duty to protect the area in which we live and we hope our questions and contribution will assist the EA in undertaking a rigorous assessment of the permit application. We understand that, in the event that all legal requirements are met, that you are obliged to issue permits. If this is the case, it will be very helpful to receive the answers to our questions so that we can communicate this information to the residents we serve.

Our questions have been organised into three sections – local environmental concerns, risk of seismic damage and the mining waste facility. In preparing our response, Councillors are mindful of the types of concerns which you are able take account of (and those that you are not). We consider that the concerns we are raising are relevant to your assessment in terms of your criteria “The shape and use of the land around the site in terms of its potential impact, whether that impact is acceptable and what pollution controls/abatement may be required” and “Information on local population and sensitive sites.”

**It is worth reiterating that we do not consider Burniston to be a suitable location for this proposal because of its rurality, the importance of protecting its beauty & tranquillity and its proximity to a residential area. All these features are strongly reflected in our submission to the planning application process still to be considered by North Yorkshire Council.**

The following pictures are from a drone flying at 38m above the proposed site of the 38m drill rig.

1) Looking East towards the Cleveland Way



2) Looking NE up the coast



3) Looking over the entrance to the site showing solar panels and 'industrial' site



4) Looking towards Burniston and the National Park



Our submission also brings to your attention information which you have not been made aware of in the application. In particular, we are raising the absence of any detail about the risks of seismic damage in Europa's application and highlighting a list of receptors which are vulnerable to impact, most of these having been missed from the EOG permit application.

## **1. Local Environmental Issues of Concern**

### **Concerns regarding Surface and Ground Water**

The EA submitted an objection to North Yorkshire County Council in respect of the construction of this well site (14<sup>th</sup> May 2025). The recommendation to refuse the planning application was based on "an unacceptable risk to groundwater." The EA considered that there was an "unacceptable risk of causing a detrimental impact to groundwater quality because there is the potential for vertical migration of pollutants to ground water in the overlying aquifer."

Councillors understand that this objection has subsequently been withdrawn in response to additional information from EOG, presumably linked to the requirement to provide a detailed construction method statement.

The Surface Water Management Plan (SWMP) has been reviewed but it contains little detail on whether the perimeter ditch and the secondary containment system have sufficient storage capacity.

The Hydrogeological Impact Assessment referenced in the SWMP for flooding criteria uses historical data obtained from The Meteorological Office, covering the period of 1999 to 2020. All calculations in the EOG application are based on these figures which do not reflect the situation today.

Current figures for the Scarborough area, obtained from The Meteorological Office, are shown in the table below and show an increase in rainfall from 2021 to 2024 at 9.5% in just 4 years.

|           | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec | <b>Total</b> |
|-----------|-----|-----|-----|-----|-----|------|------|-----|------|-----|-----|-----|--------------|
| 2021/2024 | 60  | 57  | 53  | 46  | 55  | 45   | 88   | 60  | 87   | 74  | 69  | 78  | 772          |
| 1999/2020 | 57  | 49  | 45  | 50  | 45  | 66   | 57   | 70  | 57   | 68  | 73  | 68  | 705          |

### **Question 1**

**What impact does this consistent increase have on the historic calculations in the application and is the Environment Agency fully satisfied that there is sufficient containment/storage capacity minimising all risk of contamination of groundwater.**

### **Question 2**

**Has the Environment Agency considered this in depth and if so, what conclusions have been reached?**

One of the documents submitted by EOG is their Environmental Impact Assessment. This lists 3 risks which are described as having a high impact (defined as a major environmental incident). **One of these risks (“Indirect input to groundwater from well”) is also listed a risk which has a high probability of occurring (“emissions to groundwater”).**

The very real possibility of a major environmental incident occurring in relation to our groundwater is of major concern to residents.

### **Question 3**

**How is this risk being mitigated? At what level is the risk seen as being acceptable?**

**Is the EA satisfied that the risk of causing contamination to the groundwater has been fully addressed? If so, on what basis has this revised position been reached?**

### **Local Population and Sensitive Receptor Information**

The location of this site, with its range of risks, must be considered in terms of the population and businesses which could be affected. EOG in their Planning Statement to NYC state,

“The settlement pattern outside Burniston Village is dispersed and sparse, with few residential properties in the vicinity.”

We (Burniston Parish Council) would like to provide the EA with accurate details about the sensitive receptors – this confirms a much greater number of people living locally than application documents from EOG have detailed.

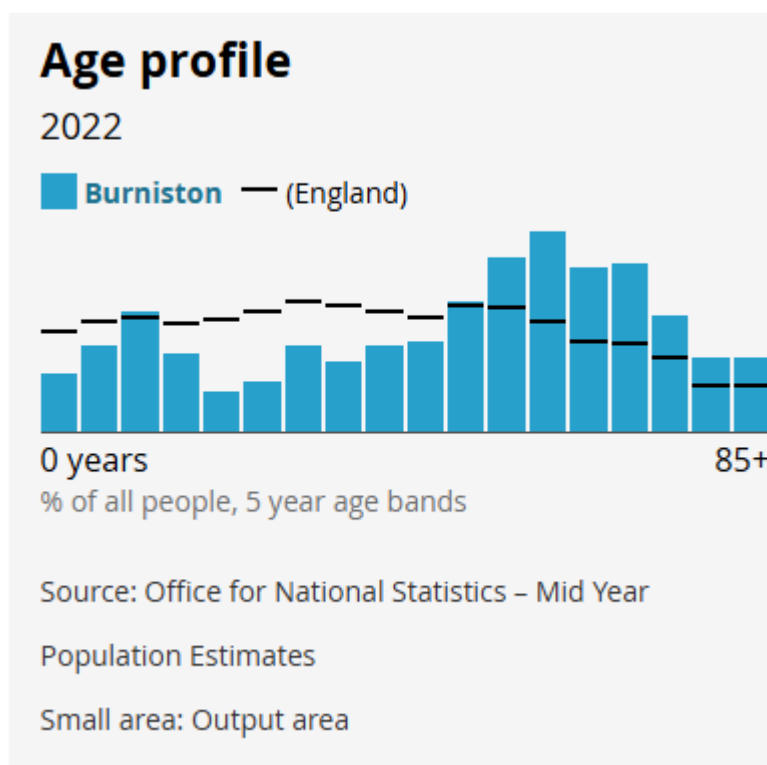
- 920 people living inside 1km
- 2785 people within 2km
- 9784 people within 3km
- 37 homes within 500m – the nearest one being on the perimeter of the site

(The above information has been supplied by the <https://www.datadaptive.com/pop/>)

The map below shows rings around the site at 500m, 1km, 2km, and 3km. The yellow border indicates where the North Yorkshire National Park starts. The whole of Burniston is within 2km, and all of Cloughton, and most of Newby & Scalby including the hospital is within 3km.



According to the ONS (figures from 2022), the proportion of the population in Burniston aged 55 years or more is 67% more than England as a whole (750 people) and this rises to 70% for people over 70 years or more (340 people). A high proportion of these live in the streets closest to the proposed site. Elderly residents are particularly vulnerable to the health impacts of air, noise and other pollution.



<https://www.ons.gov.uk/visualisaKons/customprofiles/build/#E04007662>

In view of the number of residents and businesses within very close proximity of the proposed site, including a very high percentage of vulnerable residents, we consider that

the site should be covered by a designation that would bring with it the need for Major Incident Planning and exercising to address the significant risks associated with the operation of this site.

Since the proposed drilling site is so very near to homes, businesses and vulnerable receptors (immediately adjacent in some cases), it is imperative that great care is taken to ensure that the effect of the installation upon these is taken into consideration. Alarming, people, businesses and homes have not been individually considered or identified in the EOG application. It follows that, the effect on them and therefore risks and mitigations to avoid harming them could not possibly have been properly considered or defined.

Adverse effects on sensitive receptors would come from

- Noise – from drilling, the flare, and general site activity.
- Light pollution - 24/7 light pollution from site floodlights,
- Air pollution- noxious odours and increased traffic fumes from extra HGVs and site machinery, the smell and pollution of the air from the flare.
- Spoiling of environment and views - the 38m drilling rig

These adverse effects have been proven to result in negative impacts on people such as

- Adversely affecting their current experience of day-to-day peaceful living in their own homes and gardens
- Affecting people's physical health – especially those in very close proximity to the area. The residents in the area around the site are in the majority retired and are therefore more vulnerable to pollution and stress.
- Affecting people's mental health adversely with constant noise, light and chemical pollution and noxious odours bombarding their formerly peaceful enjoyment of their homes and gardens increasing impacts on their anxiety levels and mental health.

Businesses will also be impacted, the tourist and farming industries may be severely impacted – for example

- The grain drying plant next door to the site sucks in clean air and pumps it into the grain to dry the grain for the animal feed industry. The air intake is on the side of the building immediately facing and near the proposed site. The risk is the grain will be tainted by the pollution and odours from the site and not up to animal food standards.
- The farm which surrounds the site on 3 sides uses a borehole for domestic and farm use. They grow crops and also grass for animals to feed on. There is a risk to the water, soil, livestock and crops. (and by the way the farm borehole has been missed in the application).
- The 'cinder track' - National Cycle Track 1 and the Cleveland way coastal path are within meters of the (raised) 38m drill rig and flare and are huge draws to the tourist industry. The North Yorkshire Moors National Park and the Castle are also popular landmarks. The flare and drill rig are not in keeping with the beautiful rural area and

will be highly visible from all these local assets. There are 3 caravan parks in Burniston, a wedding venue and 2 pubs – all highly dependent on the tourist industry. The economy of the village and the livelihoods of the residents have not been considered and these will take a huge hit if the proposed site was approved leading to a deterioration of village assets and living standards in the village.

- The Coastguard shares the access road into the site and needs 24/7 access. They were not even mentioned in the application.

This is a list of non residential sensitive receptors (which is not complete) within **ONE KILOMETER** of the site

- Burniston Garden Centre – a thriving and popular local family business immediately opposite the site entrance who employ vulnerable adults.
- Green Farming Ltd Grain Store – pollutants from the site risk jeopardising the strict food safety standards to which the grain drying and storage operation is required to adhere.
- Coastguard Station – which uses the same access as the proposed site entrance from the A165 Coastal Road and requires 24/7 access.
- Pockmor Feed Mill – adjacent to the access road for the drill site; likely to be adversely affected by air pollution from the site and associated HGV traffic.
- Caravan Sites – Burnside leisure park, Scarborough camping and caravan club, and The Haven. Most of their visitors are elderly and seeking a peaceful countryside experience on holiday. A nearby industrial drilling site will destroy this experience.
- Wedding Venue (The Barn at Flatts Farm) – on Coastal Road will be affected by the very near proximity and blot on the landscape view of the 38 metre drilling rig and gas flare.
- Two Pubs – The Oak Wheel and the Three Jolly Sailors with their beer gardens are currently open seven days a week and are very busy with both local and tourist trade.
- Wandales Court – Independent Living Scheme for over 55's, just off Burniston High Street, providing retirement housing. Also community activities for elderly and vulnerable residents in the whole village.
- Post Office and General Store – located on Burniston High Street, providing essential services to locals and tourists. Parking and bottlenecks of traffic there are already problematic and often hold up the smooth flow of traffic through the village.
- Sewage Work Treatment Plant – sited off the Coastal Road and a sensitive site that processes waste products.
- Burniston Household Waste Recycling centre – is situated on Coastal Road. Next to this is a now disused former tip underneath which the proposed deviated well would be drilled.
- A small business park – is situated nearly opposite the proposed site entrance.
- 'Ian's Field' which is an area next to the Burniston Household and Waste Recycling Centre with a carpenter business and agricultural storage.

- Cleveland Way (part of the Heritage Coast and currently being upgraded to form part of the new King Charles III English Coast Path) – is adjacent to the proposed drilling site and what will be a 38 metre high rig. The path attracts huge numbers of tourists and local walkers and will be in full view of the drilling rig and industrial site. EOG said the site would not be visible from the path but you can see the path from the site at ground level – so a 38m drill rig and 14m flare would be highly intrusive.
- Cinder Track – Just on the other side of the site from the Cleveland Way and less than 500m from the proposed drilling site, this forms part of National Cycle Route 1 and the international North Sea Cycle Route. It is widely used by walkers, local dog walkers, cyclists, horse riders and families. It has recently been upgraded with a new all weather surface, benches, bins, trees and signage. This is also a vital wildlife corridor. Enjoyment of this resource will inevitably be diminished by nearby drilling and associated industrial activities.
- Farms including Green Farming Limited
- Ecological habitat – adjacent to the proposed drilling site is abundant wildlife including Great Crested Newts, badgers, hares, deer, bats, owls and diverse and thriving bird populations, insect and pond life. The farmer has also installed ponds and wildlife corridors on the farm which will be very adversely affected by the installation.

This is a list of non residential sensitive receptors (which is not complete) within **TWO KILOMETERS** of the site

- Lindhead Primary school - with 215 pupils on roll including 11% with special educational needs and disabilities (SEND) and 4% with an Education, Health and Care Plan (EHCP). The youngest pupils (Early Years Foundation Stage) access outdoor learning for a lot of the school day along with all pupils playing outside at general breaktimes. The route to school through the very narrow pavements in Burniston (some only 1 meter wide) already poses a danger to pedestrians – especially children and babies in pushchairs. HGV's often overtip the pavement as there is little room on the A171 for vehicles to pass each other. Extra HGVs from the EOG site will exacerbate the already busy and narrow highway through the village.
- Burniston and Cloughton Village Hall, children's playground, tennis courts and bowls club.
- Scarborough Rugby Club – a sports facility which is used throughout the day by people of all ages, with its outdoor pitches, all age rugby training sessions, outdoor tennis and other courts plus Baron's Gym. The NHS also use this building for outpatient physiotherapy appointments and vaccinations. The top floor of the extensive building is used as a bar and for events and weddings etc. The cafe on the ground floor is a favourite meeting place. The deviated drill route goes directly beneath the rugby club premises.
- Several livery stables – horses and riders from which are regular users of the Cinder Track and the A169 Coastal Road.

- Two garages (vehicle repair centres).

#### **Question 4**

**Given the new information we have supplied that details the local population and sensitive sites, will the EA ensure that EOG follow adequate mitigation measures to protect the residents and businesses that will be impacted by the installation?**

#### **Question 5**

**What special measures will be taken to protect particularly vulnerable residents and residents/businesses who are in very close proximity to the site?**

#### **Question 6**

**Will the EA ensure the impact to our businesses and tourist industry will be reduced to an acceptable level?**

#### **Question 7**

**Will the EA consider a designation that would bring with it the need for Major Incident Planning?**

#### **Concerns about Flaring/Venting**

The cold venting and incineration of inflammable gases will result in the gases being released into the atmosphere via the shrouded flare stack. Our understanding is that natural gas contains an array of toxic hydrocarbon gasses and organic sulphurs which will be highly inflammable, odorous and reactive. The consequences of human error, equipment failure or accidents resulting in an explosion or fire is of major concern.

It should be noted that this community has very recent experience of the consequences of uncontrolled fires nearby on the moors. This is something we must seek to avoid whilst also being prepared to respond.

EOG has stated in its Environmental Risk Assessment that a fire risk is “not significant”. Given the location of this site alongside a residential area, open fields and woodland we are asking the EA to address this risk in more detail.

#### **Question 8**

**Can the EA please ensure that the fire/explosion risk is kept as low as possible by ensuring the Best Available Technique is enforced?**

#### **Question 9**

**At what level do the EA consider appropriate (i.e. maximum volume) for the flaring of gas daily and how would this be monitored and reported?**

#### **Question 10**

Considering that there is a large local objection to 24hr flaring and the potential disruption to the lives of our residents, will the EA impose a day time flaring time window as part of a permit? How would this be monitored and by whom?

**Question 11**

As it appears that EOG have downplayed the potential risk of fire/explosion on the site from the flaring operation, will the EA require EOG to be much more specific in terms of mitigation to reduce the potential of occurrence and severity of risk?

**Question 12**

It appears that no emergency response plan which involves local residents and emergency services has been considered. Do the EA not see the necessity of such a plan and see the need for this to be satisfactorily completed prior to the grant of any permit?

**Concerns about Odours**

In the Odour Management Plan, EOG state that “due to the nature of the fluids and the fluids having been exposed to the conditions of the wellbore and formation, there is the potential for odours to be present within the fluids when stored at surface within the stock tanks”.

**Question 13**

Is the odour level to be monitored by the EA or is this an area that will only be checked should a complaint be received from the public by the EA?

**Question 14**

Will the EA require EOG to be much more precise in their assessment of the process leading to odours being produced and will it be a condition of any permit that EOG are required to report to an external agency when routine monitoring of odours exceeds a permissible level?

**Concerns about Air Quality**

EOG has stated in its application that no baseline monitoring of air quality has taken place. Only a desk top study using DEFRA archive levels and taking the worst case scenario (the highest level of pollutants) was carried out. It also states that only two ambient air quality monitoring locations will be used going forwards.

**Question 15**

In a coastal area that is subject to breezes and wind from the North Sea and changes of wind direction, how is it possible for only two localised sites chosen by EOG to monitor the ambient air quality for the entire community?

**Question 16**

**With no baseline data for reference any subsequent monitoring is invalid. Is the Environment Agency satisfied with this because residents feel this is completely unacceptable?**

**Question 17**

**Will the EA consider setting a condition that regular but random monitoring data be collected over a wider area and for a period of months prior to the construction starting and that this monitoring is undertaken by an agency that is independent of the EOG company?**

**Question 18**

**Is the EA expected to issue permits based on a small amount of data that is very localised to the proposed site?**

**2. Risk of seismic damage**

The submissions from EOG do not include a detailed deep structure analysis. Despite repeated requests, Europa continues to maintain that consideration of geological matters is not part of the local planning approval process but, instead, occurs later and through other authorities.

This seems to be in direct contravention of the published local plan in which an understanding of the geological context is clearly required. We would expect there to be an obligation to know and present detailed subsurface information as part of the proposal. It seems inconceivable that Europa has not carried out a survey of the deep geological structures to decide the site from which to drill and the direction(s) in which to pursue extraction.

We are pleased to see that in your “Notice of Request for More Information” (Schedule 5) that you have asked for more detailed information about the geological sub structure. In the previously mentioned presentation of the 18th of September 2025, Mr Holland stated that the seismological testing would take place after planning permission has been granted. As of today, North Yorkshire have not published a Planning committee date to decide upon this application and yet the EA are expected to consider a permit application without any access to such data?

We are informed by a geological expert that the data currently held is ancient, that no one has up to date seismic data for this area. No one has up to date seismic data around the Peak Trough, that lies directly below the proposed drill site. It appears extremely casual to expect that permits will be issued when the data on which the permits application are largely based is non-existent in an up-to-date form.

It should be noted in the Waste Management Plan document submitted by Europa to the Environment Agency, it describes the Proppant Squeeze process as 4 treatments of 300 –

500 cubic meter pretreatment at 9000psi, resulting in the total volume of proppant squeeze and diluent of  $\leq 2000$ l of contaminated fluid".

**At the Cuadrilla site at Preston New Road, Lancashire, there was induced seismic activity using one treatment of almost half the amount EOG are proposing.**

The proposal that there will be 4 treatments at this site is, we believe, new information which was not specified in the planning application to NYC. It will, surely, quadruple the risk of seismic damage occurring in our community?

The EA has produced a research report that specifically investigates various types of methods used in the Oil & Gas industry. The report "Potential Environmental Impacts from Techniques to Enhance Rock Permeability" considers different volumes of fracking and the use of Carbon Dioxide (which EOG has put forward as an alternative method for the Burniston site). The conclusion of the research is that there is insufficient data although it is known that using  $\text{CO}_2$  produced larger fractures with more secondary fractures than is achieved with high volume fracking.

#### **Question 19**

**What is the Environment Agency's expert opinion on the complexity of geological structures which exist beneath the site being considered?**

#### **Question 20**

**What is the Environment Agency's assessment of the potential for seismic damage as a result of the Europa proposal? How can the Environment Agency reach any realistic conclusion that is based on out-of-date and incomplete seismic data?**

#### **Question 21**

**Is the Environment Agency fully satisfied that EOG can prove the safety of using a Proppant Squeeze technique (or  $\text{CO}_2$ ) if the EA as a body has published research which concludes there is insufficient data to prove either way?**

### **3. Mining Waste Facility**

The EOG application documents refer to an underground waste facility off Barmoor Lane, Scalby, **hitherto unknown**. This development would be of a significant size and scale. This facility will hold 50- 70% of the proppant squeeze and thus  $\leq 1400$ litres contaminated fluid" 'within the rock formation for an indefinite period. This brings this aspect into the "after closure" phase and is part of the entire life cycle of the drilling proposal. It has been stated that there will be a gradual deterioration of the fluid over time.

#### **Question 22**

**What is 'gradual' and what period of time is deemed acceptable?**

### **Question 23**

**Can EOG prove that the gradual deterioration will have no effect on the integrity of the MW Facility at any point and is the Environment fully satisfied with the response?**

This facility was NOT included in the original application being considered by North Yorkshire Council and this fact is being made public by bringing it to the attention of the EA only now.

Barmoor Lane is a long way from the drill head site (around 1.6km) and, under the EA's criteria relating to "the shape and use of the land **around the site**", we would suggest that this facility cannot be considered simply as part of the bid to the EA for permits. We would argue that it is an entirely separate site which should be subject to a separate planning application. A full planning application process would give the proper opportunity for scrutiny from residents and the relevant authorities. This appears to be a very casual attempt to add additional information which should have been highlighted early in any application process.

### **Question 24**

**Has the landowner overground, and underground been consulted and permissions obtained?**

In their application, EOG has firmly argued that this facility should not be classed as a Category A Mineral & Waste Facility which may well be the case. It is also doubtful that it would meet the criteria for a COMAH site. Nevertheless, councillors believe there is a compelling argument that this whole proposal (i.e. the wellhead and the mining facility) should be covered by a designated status that brings with it responsibilities for off-site safety.

### **Question 25**

**Has the EA considered the requirement for off-site safety requiring a multi-agency planning and response and, if so, what recommendation will it put forward?**

### **Question 26**

**Should the development of an underground waste facility be subject to a full planning application so that the impact of this proposal can be properly considered by the relevant authorities with input from local residents?**

**If that is the case should this site be subject to a separate permit application?**

### **Question 27**

**What is the Environment Agency's assessment of proppant squeeze fluid being left underground indefinitely? Is there any knowledge about any damage to the rock formation which may occur as the fluid deteriorates?**

### **Conclusion**

The Councillors at Burniston Parish Council and the people whom we represent are aware that the permit application is in parts highly technical, hence our outside consultations. We as a community are extremely concerned that, despite the amount of documentation submitted by EOG to the Environment Agency, there are still important areas that appear to have been dismissed as irrelevant by EOG.

The schedule 5 notice issued by the Environment Agency to Europa Oil & Gas goes some way to providing the correct information.

The community of this Parish represented in full by Burniston Parish Council hope and expect that each and every question is answered in full by Europa Oil & Gas and approved in full by the Environment Agency, prior to the granting of any permits.

**Burniston Parish Council object to this permit application.**