



## Comments from Frack Free Coastal Communities

### Context

At the NYMNP Coastal Areas Parish Forum on 28<sup>th</sup> April 2025, residents of the coastal parishes (including those living within the National Park) raised questions about this planning application to drill a gas well at Burniston. We were told that officers had not yet finished scrutinising the application and that when they had formulated their report we would have an opportunity to comment. Frack Free Coastal Communities (FFCC) are therefore taking this opportunity to comment to members of the planning committee on serious deficiencies in the planning application, some but not all of which have been partially addressed by officers in their report. We note the NYMNP statement on its website that *“surface development [for fracking] outside but near to the boundary of the National Park [should] be subject to more detailed scrutiny of impact on the National Park landscape, including its setting”*.

### Choice of site for the development

The officers' report states, correctly, that the proposed site lies outside but close to the National Park. It seems that the National Park Authority is partly responsible for the site selection. The applicant, in their 'consultation' with the local community in September 2024, made a virtue of the fact that *“the site has been specifically chosen on the advice of the National Park Authority”*<sup>1</sup>. We feel, therefore, that it is disingenuous for the Authority to ignore impacts on local ecology and on residents who live close to the site but outside the National Park on the grounds that they have no statutory responsibility in relation to those areas and residents' wellbeing.

### Conflict with Polyhalite extraction from Woodsmith mine

We would draw members' attention to the representation on the NYC Planning Register made on behalf of Anglo American Woodsmith Limited (250411 *Litchfields on behalf of Anglo American*) in respect of the potential conflict between the proposed development and the protections afforded by the Minerals and Waste Joint Plan. The Woodsmith mine was given planning approval by NYMNP and it would seem perverse for that same Authority to have no objection to a minerals development that would effectively sterilise large areas of potential polyhalite extraction.

### Confusion over the nature of the proposed development

The application is for *Construction of a temporary wellsite for the appraisal of gas, including drilling operation, proppant squeeze and flow testing operation and site restoration*. However the Planning Statement, on its title page and elsewhere in the text including the Executive Summary, and the accompanying Environmental Statement, says it is for the *construction of a wellsite and operation of a drilling rig for the appraisal of subsurface hydrocarbons, well testing and the retention of equipment*. This is a materially different project which indicates the applicant's intention to retain equipment on site for further development and suggests that the 'temporary and short term' description of the project cannot be taken at face value.

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<sup>1</sup> <https://europaoil.com/wp-content/uploads/2024/09/Burniston-Info-p12.pdf>

We respectfully ask members of the committee to consider postponing discussion of their response to the NYC consultation until the applicant resolves this confusion.

### **Ecological impact**

Officers do not comment on the scientific, methodological and professional deficiencies of the applicant's Preliminary Ecological Appraisal. These have implications for wildlife moving between the National Park and the Heritage Coastal area in which the proposed wellsite sits. Their assessment, whether wilfully or through incompetence, ignores previously published ecological reports which give a very different picture from their analysis. It ignores the wider setting of the site, within farmland where considerable investment has been made over recent years to enhance biodiversity and improve wildlife corridors. It suggests, with no evidence and contrary to previous assessments, that neighbouring ponds are heavily polluted and of little ecological interest despite them seething with wildlife, recognised by ecologists as breeding grounds for great crested newts and designed to avoid runoff from farmland. The site itself is self-evidently a tranquil haven for wildlife, both resident and itinerant, while the hedgerows bordering the site are important components of wildlife corridors linking to the National Park a few hundred metres to the north.

### **Landscape and Visual Impact**

Officers note the applicant says visibility of the development from within NYMNP will be *"limited to the uppermost parts of the drill rig"*. This is not true. The ground surface of the proposed drill site is clearly visible from within the National Park, for example along the ridge at the top of Limestone Road, along Swang Road. This is one of several instances where the applicant's documentation contains misleading statements and carefully limited data.

### **Traffic**

Officers say (p.75) that the 'Northern Route' (along the A171 through Cloughton and the National Park) from the proposed wellsite is not assessed in the application because it would only be used in exceptional circumstances, with all HGV traffic expected to use the two 'Southern Routes' which do not go through the National Park. However, the applicant's Emissions Report states clearly that they base their HGV emissions calculations on the assumption that **"all loads will come from Teesside"** with a roundtrip of 80 miles (40 miles one way) – a **distance that is only possible if the Northern Route is used** (*Cloughton 2 Appraisal Well - Emissions Report*, Table 5). Much of that route is within the National Park.

This anomaly is considered by officers at page 79, but only in relation to overall GHG emissions and not other traffic impacts including road safety and interaction with vulnerable road users (walkers, cyclists, horses and their riders) at points where public rights of way cross the A171 within the National Park.

Officers conclude that "it is not considered that significant harm to the National Park would arise as a result of traffic associated with the development, providing that implementation of the applicant's proposed CTMP (to include the HGV routing restriction) is secured via planning condition". However, such a planning condition would render the Emissions Report calculations void. FFCC consider it would be prudent for members to postpone further consideration of the application until the applicant has completed a proper assessment of the Northern Route through the National Park, in accordance with their Emissions Report, or re-calculated emissions

on the basis of HGVs using the Southern Routes. The cumulative impact of the increase in HGV traffic on the Northern Route should also be properly assessed.

### **Dark Skies**

Officers (pp.73f) point out that the applicant has misrepresented the environmental zoning of the National Park from a lighting perspective and therefore misrepresented the potential impact of lighting at the site.

### **Greenhouse Gas Emissions and Climate Change**

Officers review the broader context of NYC and NYMNP commitment to becoming 'carbon negative' and acknowledge *that "the proposed development, which would mark a significant step towards potential exploitation of a fossil fuel resource in close proximity to the National Park boundary, sits uncomfortably"* within that context. This is a welcome element of the report but misses the point that the applicant's stated ambition (to investors, shareholders and the local community) includes targeting those parts of the 'Cloughton gas find' which lie within the National Park. As the Anglo American representation (above) points out, the applicant's map of the targeted hydrocarbons conveniently stops short of the NP boundary; unlike the maps they present to investors which show the full extent of the gas they intend to exploit running up beyond Cloughton and towards Staintondale to the north.

### **Conclusion**

We respectfully invite the committee to take into account these widespread errors, inconsistencies and gaps in the applicant's documentation when considering their response to the NYC consultation on this planning application for drilling a gas well close to the boundary of the National Park.

Professor Chris Garforth  
Chair of Frack Free Coastal Communities Steering Group  
13/5/2025