Briefing Report:

Egdon Gas Drilling proposal

Prepared for Foxholes and Butterwick Parish Council

August 2025

Working Group

The Working Group preparing this document to brief Foxholes & Butterwick Parish Council on Egdon's gas drilling proposal, undertook this activity from an unbiased, neutral standpoint.

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Glossary

Glossary of terms:

AONB - Area of Outstanding Natural Beauty

BAT - Best Available Techniques

Bcf - Billions of cubic feet (gas)

BEIS - Department for Business, Energy and Industrial Strategy

BOP - Blow Out Prevention

BS - British Standards

CBFs - Community Benefit Funds

CCC - Climate Change Committee

CCUS - Carbon Capture Use or Storage

CIA - Cumulative Impact Assessment

CIL - Community Infrastructure Levy

CLGs - Community Liaison Groups

C0 - Carbon Monoxide

COPD - Chronic Obstructive Airway Disease

CPRE - Campaign for the Protection of Rural England

DCR - Design & Construction Regulations

DEFRA - Department for Environment, Food & Rural Affairs

DESNZ - Department for Energy Security and Net Zero

DWPA - Drinking Water Protected Areas

DrWPA - Drilling and Well Abandonment Practice Arrangement

EA - Environment Agency

EEA - European Environment Agency

EIA - Environmental Impact Assessment

EIS - Environmental Impact Statement

ERRT - East Riding Rivers Trust

ERYC - East Riding of Yorkshire Council

ESC - Environmental Stress Cracking

FBPC - Foxholes & Butterwick Parish Council

GHG's - Greenhouse Gas Emissions

H2S - Hydrogen Sulphide

HDPE - Impermeable Membrane

HGV - Heavy Goods Vehicle

LDAR - Leak Detection & Repair

LPA's - Local Planning Authority

LPG - Liquified Petroleum Gas

Mcf - Millions of cubic feet (gas)

MWJP - Minerals & Waste Joint Plan

NCA - National Character Area

NLD - National Landscape Designation

NORM - Naturally Occurring Radioactive Material

NOx - Nitrous Oxide

NPPF - National Planning Policy Framework

NSTA - North Sea Transition Authority

NYC - North Yorkshire Council

OGA - Oil & Gas Authority

SERG - Shale Environmental Regulator Group

SPZs - Source Protection Zones

SSE - South, South-East

SSSI - Site of Special Scientific Interest

TVD - True Vertical Depth

UN - United Nations

VOC's - Volatile Organic Compounds

WNPC - Wold Newton Parish Council

YWT - Yorkshire Wildlife Trust

Introduction

On the 20th January 2025, Egdon Resources Limited, submitted a Request for a Screening Opinion to North Yorkshire Council NYC), requesting temporary planning permission for the construction of a temporary wellsite to explore for gas, on land north of Butt Lane Foxholes.

The screening opinion was to determine whether an Environmental Impact Assessment (EIA) was required for this development. On the 6th February 2025, a Planning Officer from NYC responded:

*'the proposed development **is not EIA development** and **need not** be accompanied by an Environmental Statement.'*

At this point, residents from Foxholes and members of the Parish Council became aware of this proposal. Foxholes & Butterwick Parish Council (F&BPC), were not a designated consultee for said application. However, both F&BPC and individual residents appealed the decision not to require an EIA. Both NYC and the relevant Secretary of State, summarily dismissed these appeals.

It was clear that Egdon Resources were planning to proceed with a planning application for a test drill site. F&BPC were aware they would be a statutory consultee for this application and also the associated time constraints. Whilst at this point F&BPC were unable to adopt a position on this development, it was considered to be good practice, to undertake some fact finding, research and community engagement activity to inform thinking.

This document was commissioned on that basis, with a starting point of neutrality, looking at the potential benefits and pitfalls of this development. Information was gathered and synthesised from all sides of the argument in order to produce a recommendation for consideration by F&BPC and their residents.

The results of this fact finding are contained within.

Location

Site Location and Planning Context

The proposed drilling site lies within North Yorkshire, where North Yorkshire Council (NYC) serves as the designated administrative authority. It is situated within the parish boundaries of Foxholes & Butterwick.

The boundary with the East Riding of Yorkshire lies approximately 350 metres east of the proposed site. Geographically, the proposed site is located around 920 metres east of Foxholes village and approximately 2.1 kilometres west of Wold Newton.

The nearest residential properties include:

- Westfield House, located 620 metres to the east
- Residential properties in Eastfield, Foxholes, located approximately 920 metres to the west.

The proposed development area covers 1 hectare of agricultural farmland. The topography of the site slopes gently from north to south, draining toward Butt Lane.

Relevant Historic Planning Applications

Two previous planning applications near the proposed site remain material considerations, as the current location lies within close proximity (just two fields away), to those earlier proposals:

1. Wind Turbine Proposal (2013)
    - Location: Land approximately 1.2 km northeast of Westfield Farm, Foxholes Road (Butt Lane), Wold Newton
    - Planning Authority: East Riding of Yorkshire Council (ERYC)
    - Outcome: Refused in April 2013
      This application was refused due to unacceptable interference to radar at RAF Staxton Wold, lack of consideration of heritage assets and noise levels above national guidelines.

2. Fordon 1 Exploratory Well Site (2013)
    - Location: North Cotes Road, approximately two fields north of the current proposed site
    - Planning Authority: North Yorkshire County Council (NYC)
    - Application Reference: NY/2013/0226/FUL (also referenced as C3/13/00964/CPO)
    - Outcome: Application withdrawn by Viking UK Gas Ltd, citing changing developer priorities

- Context: Prior to withdrawal, **objections were formally submitted by both Yorkshire Water and the Environment Agency**. These concerns were not addressed by the applicant at the time.

Given the proximity of the current proposal to the Fordon 1 site, it is appropriate that NYC gives full consideration to the consultation responses submitted for the earlier application. The issues raised, particularly those concerning water protection and environmental safeguards, remain unanswered and are directly relevant to the current proposal. Additionally, given the proximity to the previously proposed wind turbine site, interference with radar at RAF Staxton Wold, may still require consideration from drilling activity.

"Due to austerity, the Environment Agency has been consistently underfunded. Therefore energy companies end up self regulating."

(Foxholes resident).

Hydrogeology

Specific Geological Context and Drilling Plans

The Principal Chalk Aquifer in the Yorkshire Wolds overlies a succession of sedimentary formations, including the Corallian Limestone aquifer. These two aquifers—Chalk and Corallian—are stratigraphically distinct, typically separated by 100 to 300 metres of intervening Jurassic and marine sediments. This separation provides a degree of natural hydraulic isolation but also introduces complexity when drilling through multiple formations.

The region's broader geology includes the Sherwood Sandstone Group, a well-established aquifer across many parts of the UK. In the Vale of Pickering and surrounding areas, including the Yorkshire Wolds. It often contains formation water (saline or brackish groundwater), due to its porosity and long geological residence time.

The Weaverthorpe Field, the focus of the current exploration application, lies within North Yorkshire. It represents a gas prospect where hydrocarbons may have accumulated within the Sherwood Sandstone, which here acts as the reservoir rock.

Previous wells in the area, such as those drilled at Kirby Misperton and Malton, have shown that the Sherwood Sandstone is often water-bearing, particularly in zones lacking effective hydrocarbon traps. However, in structurally favorable sites like Weaverthorpe, gas may be trapped at the crest of the formation, while lower portions remain saturated with water.

Egdon Resources is targeting a structural closure in the Foxholes area of the Weaverthorpe Field, aiming to intercept a potential gas cap at the top of the Sherwood Sandstone. However, water is still expected in much of the reservoir, particularly along the flanks and base. The proposed well is exploratory, meaning the presence of commercial gas remains unconfirmed at this stage.

Drilling Trajectory and Depth

At the Foxholes exploration site, Egdon proposes a vertical borehole that will pass through approximately 250 to 400 metres of chalk before reaching the Sherwood Sandstone at a depth of around 400 metres, ultimately continuing to a total depth of approximately 1,100 metres true vertical depth (TVD). This will be followed by lateral drilling for 4-500m in a NW direction. These trajectories are designed to assess the viability of the gas prospect in the Sherwood interval.

Initial flow testing is planned across the Sherwood section. Importantly, hydraulic fracturing is explicitly excluded from this phase of the operation. Only the uppermost segment of the Sherwood formation is expected to potentially contain gas, if an effective trap is encountered. While the remainder is likely to be water-saturated.

Hydrogeological Sensitivity: Proximity to Gypsey Race

The proposed drilling site lies within 200 metres of the Gypsey Race, a chalk-fed intermittent stream of high ecological and hydrogeological significance. Originating near Duggleby, the stream typically flows intermittently to West Lutton, where it often disappears underground. Downstream, flow may resume under wet conditions, extending intermittently to Wold Newton, and from Rudston to Bridlington.

Superficial head drift deposits overlie the chalk along the course of the Gypsey Race in this area. These deposits are classed as a secondary aquifer, and groundwater from the chalk aquifer provides baseflow for the Gypsey Race. The Gypsey Race is a winterbourne watercourse (normally), meaning it flows in the winter, depending on the height of the water table, then some parts of it dry up in the summer.

The Gypsey Race catchment is predominantly rural and confined within a well-defined chalk valley. As a chalk stream, it supports rare aquatic habitats that are particularly vulnerable to changes in groundwater chemistry, temperature, and flow regimes. Given the proximity of the drilling site to this sensitive system, any disturbance to the chalk aquifer, either via contamination, mixing with deeper aquifers, or pressure changes, could have ecological implications.

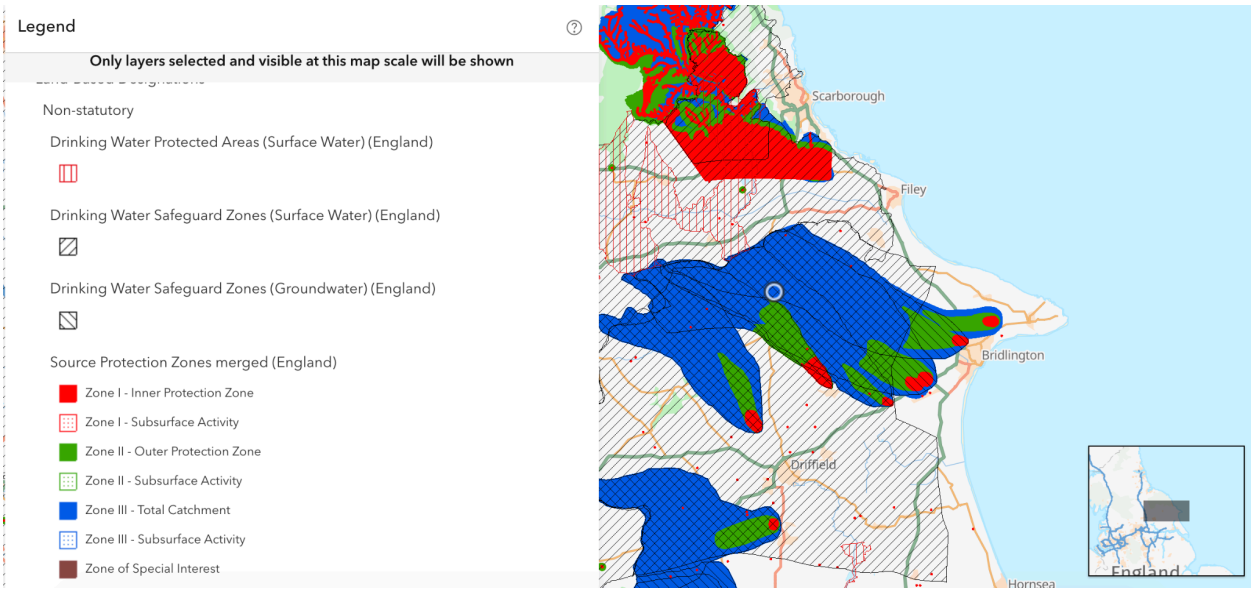
Water Source Protection Area

In terms of groundwater and local ecology, Foxholes and the surrounding area sits within numerous groundwater designations which can be viewed on Magic Map in more detail, namely:

- Source Protection Zone 3 for numerous potable water supplies
- Groundwater Drinking Water Safeguard Zone for: Haisthorpe, Burton Agnes and Bridlington.
  The proposed drilling site specifically, sits within a field designated as a Source Protection Zone (SPZ) type 3. Meaning Foxholes sits in what is termed a Total Catchment Zone. This defines an area from which groundwater flows towards an abstraction point (well or spring). One of which locally is Haisthorpe, near Bridlington. Here, the borehole supplies local water, which is treated at Yorkshire Water's Haisthorpe Treatment Works.

Essentially, Foxholes sits within a SPZ3, where any pollution or changes to the groundwater could affect the water being drawn for drinking or other uses.

Please see image below (courtesy of public source information - MagicMap)



"Any breach of the chalk aquifer would be catastrophic for 900,000 residents, farmers and businesses. Especially when monitoring is like marking your own homework and is certainly not scrutiny."

(Foxholes resident)

Impact on Water

Flood Risk, Hydrogeological, and Surface Water Drainage Considerations

A full Flood Risk, Hydrogeological, and Surface Water Drainage Risk Assessment must be submitted as part of this application, and this submission should reflect the site's highly sensitive geological and hydrological setting.

Context

The proposed site lies within the Yorkshire Wolds, which are underlain by Cretaceous Chalk formations, a major aquifer for much of eastern and southern England. This aquifer:

- Has low matrix permeability but highly interconnected fractures,
- Is capable of significant groundwater storage and flow,
- It is classified as a Principal Aquifer and Drinking Water Protected Area under the EU Water Framework Directive (retained in UK law).

The chalk aquifer beneath the site is particularly vulnerable to contamination due to its permeability and fractured structure. Karstic conduits and episodic springs, like those seen at Wetwang and Huggate, indicate the potential for rapid subsurface pollutant transport.

Groundwater Flow and Direction

Groundwater near Foxholes flows predominantly to the south-southeast (150°–160°). The hydraulic gradient (0.0016–0.0031 m/m) means that even shallow slopes are capable of driving significant flow.

Importantly, the proposed horizontal drilling direction (NW) is directly opposed to natural groundwater flow, raising the following key risks:

1. Groundwater Contamination Risk

- Drilling against the gradient could facilitate reverse migration of pollutants toward cleaner aquifer zones.
- May increase pressure gradients, pushing contaminants (including methane and drilling fluids), into freshwater supplies.
- Interferes with natural dilution and dispersal processes.

2. Subsurface Fracture Behaviour

- Altered pressure balances may cause fractures to propagate unpredictably.
- Artificial pathways created during drilling may act as conduits for rapid pollutant transport.

3. Resource Conflict

- Down-gradient water users, including public abstraction points at Driffield and Kilham, could be at risk.
- The aquifer supplies over 900,000 people, including the City of Hull.

4. Regulatory Implications

- Drilling against flow raises red flags for hydrogeologists and regulators, triggering enhanced oversight.

Membrane Protection and Pollution Risks

Egdon proposes an impermeable HDPE membrane to prevent leaching of pollutants. However, such membranes are only as reliable as their installation, maintenance, and management. Documented issues include:

- Spilled hydrocarbons (diesel, oil)
- Chemical additives from drilling muds (e.g. barium sulphate, caustic soda)
- Produced water containing salts, heavy metals, and potential NORMs (naturally occurring radioactive materials)
- Poor weather management (pollutant laden runoff during rain events)
- Worker health exposure risks

Studies (Lindsay & Rowe, 2005; Illinyk et al, 2023; Ismail & Nosbi, 2020) indicate surface pollutants on HDPE membranes can be significant, if inadequately managed.

Failure modes include:

- Welding defects and poor installation
- Punctures from equipment
- Chemical attack or UV degradation
- Stress cracking and thermal expansion

The Environment Agency (EA) should impose conditions to stringently mitigate these risks.

Water Usage and Fracturing

The application refers to conventional gas extraction, not high-volume hydraulic fracturing. However, if Egdon subsequently proposes a proppant squeeze, a technique which:

- Uses lower fluid volumes than hydraulic fracturing,
- Is not currently covered by the fracking moratorium,
- Has been the subject of a recent Early Day Motion (June 2025) calling for moratorium extension.

Hence we would strongly urge the Planning Committee at NYC, to treat this activity with the same caution as traditional fracking, particularly in light of geological sensitivity.

Well Design and Integrity

Egdon states they will adopt a multi-layered well casing design, with at least two steel and cement barriers isolating the aquifer. While this is a regulatory requirement, experience suggests:

- Cement jobs can fail over time
- Migration of gas or fluids can occur, even with correct casing
- Casing integrity must be proven not only initially, but maintained throughout the site's life and post-closure

Additional Key Risks and Oversight Gaps

1. Legacy Features: Disused chalk pits lie to the N/NW of the site. The contents of their infill are unknown. If encountered, they may present unanticipated contamination risks.
2. Membrane Management: Egdon must publish a management plan for maintaining and inspecting the HDPE membrane. This should include handling procedures for spills and equipment refuelling.
3. Regulatory Protections:
    - The site lies within a Drinking Water Protected Area (DWPA).
    - The unsaturated zone of the chalk aquifer is highly vulnerable.
    - The Environment Agency's vulnerability maps show this to be a high-risk location for pollution, based on intrinsic and specific vulnerability.

Key Questions & Outstanding Issues

To protect public interest and the integrity of the aquifer, the following questions should be addressed prior to approval:

1. Yield Estimates:
    - How does Egdon determine whether the expected yield is commercially viable?
    - Is there a threshold yield below which production is not permitted?
2. Worst-Case Planning:
    - Will a worst-case scenario plan be provided as a condition of any approval, including measures in the event of contamination of the public water supply?
3. Incident Disclosure:
    - Has Egdon experienced previous incidents? Will it commit to full disclosure of all incident reports and investigation outcomes?
4. Contractor Oversight:
    - What code of conduct governs third-party contractors?
    - What is the reporting chain if concerns are raised—both for Egdon employees and for contractors?
    - What role does North Yorkshire Council play in monitoring or responding to such concerns?

5. Public Accountability and Redress:
    - What mechanisms are in place for members of the public, including those outside Foxholes but within the impact area of horizontal drilling, to raise concerns and seek redress?
6. Trigger Points for Cessation:
    - What are the technical thresholds or environmental monitoring triggers that would require drilling to be halted?
    - Who is responsible for enforcing this?
7. Financial Responsibility:
    - In the event of aquifer contamination, what mechanisms are in place to guarantee compensation and remediation?
    - Given the well-documented record of Yorkshire Water prioritising shareholder returns over infrastructure investment, what confidence can be given that the costs will not fall to the public?

Conclusions and Recommendations

This site sits atop one of the most important and vulnerable aquifers in England, supplying hundreds of thousands of people with drinking water. The hydrogeological characteristics of the chalk formations make the risk of irreversible contamination a credible concern, especially given the direction of drilling, legacy subsurface features, and potential for mismanaged surface pollution.

We strongly suggest the following require urgent consideration:

1. That this application not be approved unless all hydrogeological risks are fully and independently assessed;
2. That the previous objections by the Environment Agency and Yorkshire Water (in the 2013 Fordon 1 application) be fully considered as material planning matters;
3. That a worst-case response plan be included as a formal planning condition;
4. That community redress, incident transparency, and contractor accountability mechanisms be defined and published as part of this process;
5. That no approval be granted until or unless all outstanding questions raised herein have been publicly addressed.

“For me, it's all about the water. It MUST not become polluted.”

(Foxholes resident).

AIR QUALITY & DUST

Environmental and Public Health Impacts

1. Public Concerns: Air Quality and Dust

Multiple public comments have identified air quality and dust as key issues. These are inherently linked: increased dust emissions will worsen local air quality, particularly during dry, windy conditions.

Dust is expected to be generated from several sources:

- Drilling operations that disturb the subsoil.
- Heavy Goods Vehicle (HGV) movements on narrow, partially unsurfaced roads—likely to disturb verges and generate airborne dust.
- The unmade access road at the site entrance will further contribute to dust emissions, especially during periods of dry weather.

2. Prevailing Winds and School Proximity

Foxholes and Wold Newton are situated within the path of prevailing westerly and southwesterly winds typical of the UK. Given the proposed drilling site's position upwind of Wold Newton Primary School, there is a credible risk that dust and airborne pollutants will be carried toward the school.

No assessment appears to have been conducted on the downwind air quality impacts on the school or local residential areas. This is a significant omission, particularly in light of the growing evidence linking airborne particulates with negative health outcomes in children.

3. Respiratory Health in the Region

The population of North and East Yorkshire already suffers disproportionately from respiratory illness:

- Emergency admissions for COPD and other respiratory conditions are well above national averages.
- Asthma rates are significantly higher than in other parts of the UK, with a 45% increase in GP asthma visits recorded in early 2025.
- The NHS North East and Yorkshire region is the worst affected in England for respiratory related admissions.
- These trends are exacerbated by air pollution, historical smoking, socioeconomic deprivation, and aging demographics.

Adding further pollution from industrial activity, especially without robust mitigation and oversight, risks worsening this already critical public health burden.

4. Air Quality Monitoring and Regulation

There are several national documents relevant to air quality in the context of onshore oil and gas development, including:

- Environment Agency (EA) Sector Guidance
- Methane Action Plan (2024–2026)
- Onshore Monitoring Framework for Methane
- National Policy Statement for Energy (EN-1)

These documents require applicants to:

- Assess and mitigate air quality impacts.
- Regularly monitor emissions, including dust and methane.
- Implement mitigation measures where necessary.
- Share results transparently with regulators and the community.

However, concerns remain regarding independence of monitoring. Operators should not be permitted to monitor their own emissions without oversight.

We strongly recommend that emissions monitoring, particularly for dust and air quality, be undertaken by independent contractors.

Why can these not be undertaken directly by the Environment Agency?
Reliance on self-reporting risks undermining public trust and accountability.

5. Local Air Quality Data (DEFRA)

Latest DEFRA figures show:

Regional Deaths Attributable to Air Pollution (2023) range from 4.2 - 4.8%

Regional Deaths Attributable to Air Pollution (2022) range from 4.3 - 4.7%

Air Pollution Concentration North Yorkshire = 5.6 μg/m³. East Yorkshire = 6.4 μg/m³

These figures indicate significant ongoing public health risks from air pollution, even before any additional emissions from the proposed development.

6. Sweet Gas v Sour Gas

The nature of the gas discovered at the site will significantly influence air quality outcomes:

- Sweet gas (low in hydrogen sulphide) is relatively benign and easier to handle.
- Sour gas (high in hydrogen sulphide) is toxic and corrosive, requiring on-site processing (e.g. amine treatment) and poses a serious threat to health and the environment if not properly managed.

If sour gas is encountered and extracted, what additional infrastructure will be required? How will emissions from such infrastructure be mitigated and monitored?

No details have been provided to date on the protocols for sweetening sour gas or the potential health impacts of associated operations such as flaring.

7. Flaring and Noise

The use of flaring presents further risks:

- Flaring releases VOCs, CO_2, methane, and soot, contributing to local air pollution.
- Acoustic modelling and mitigation is required to assess the effect of flaring noise on local residents and on Wold Newton Primary School, especially considering the amplifying effects of the Wold Valley's topography.

Conclusion

Given the above, we would suggest the following are required:

1. A full Health Impact Assessment, including detailed modelling of air quality impacts and cumulative emissions (dust, methane, VOCs).
2. Independent, third-party air quality and dust monitoring, with results made available to the local community in real time.
3. Assessment of the impact of prevailing winds on downwind sites, including Wold Newton Primary School.
4. Clarification on the potential for sour gas extraction, and the required infrastructure, emissions, and mitigation plans.
5. Full acoustic and flaring modelling data assessing impacts on schools and residents.
6. A clear outline of inspection frequency and transparency procedures by the Environment Agency and local authorities.

Without these assurances, the proposed development represents an unacceptable risk to local air quality and public health, particularly for vulnerable groups such as schoolchildren and the elderly.

Noise Pollution and Acoustic Amplification in the Wold Valley

Definition and Measurement of Noise

According to the European Environment Agency (EEA), noise pollution refers to:

“Harmful or unwanted sounds in the environment, which in specific locales, can be measured and averaged over a period of time.”

In practical terms, noise pollution arises when unwanted or intrusive sound disrupts daily life or negatively impacts health. Sound itself is characterised by pitch and volume, with volume typically measured in decibels (dB). Crucially, noise may be continuous or intermittent, and its impact depends not only on loudness, but also on timing, duration, and frequency of occurrence. All factors that influence human perception and stress response.

The decibel scale is logarithmic, meaning each 10 dB increase represents approximately a doubling in perceived loudness. Typical sound levels include:

Sound Source - approximate dB Level

Leaves rustling, whisper 30 dB

Average room noise 40–50 dB

Background music 60 dB

Average office 70 dB

Underground train, airplane cabin 80 dB

Hairdryer 90 dB

Nightclub, live rock concert 110 dB

Local Concerns in Foxholes

Residents of Foxholes (and F&BPC on their behalf) have expressed persistent concern about the cumulative noise burden, particularly from road traffic on the B1249, which bisects the village. F&BPC has formally requested that North Yorkshire Council (NYC) conduct an environmental noise survey on three separate occasions to establish baseline dB levels.

To date, no response has been received from NYC, and no measurements have been carried out. This is unacceptable, given:

- The frequency of resident complaints.
- The known acoustic dynamics of the Wold Valley.
- The impending risk of industrial noise from proposed drilling operations.

Acoustic Amplification in the Wold Valley

The B1249 passes directly through the Great Wold Valley, a landscape whose shape and surface conditions significantly amplify environmental noise, especially traffic. The valley acts as an acoustic corridor, where sound travels farther and is more intrusive due to the following factors:

1. Valley Channelling & Sound Reflection

The linear, concave topography of the Wold Valley guides sound waves along its length, effectively channelling and concentrating road noise. As waves reflect off the valley's gently sloping sides, the sound persists and can appear louder than in open or elevated landscapes.

2. Topographical Resonance

The long, enclosed nature of the valley causes echoing and sound layering. Instead of dissipating, sounds, particularly those from fast-moving vehicles, are compounded by overlapping reflections, making them more intense and disruptive.

3. Atmospheric Inversions

Valleys are prone to temperature inversions, especially overnight or in still weather. A warmer air layer traps cooler air (and noise) beneath it. This acoustic "ceiling" prevents upward sound escape, meaning noise from even a single passing HGV or Motor Bike can seem prolonged, amplified, and inescapable to residents.

4. Road Surface and Traffic Type

The B1249 uses coarse tarmac, which produces more tyre friction noise, especially at higher speeds or during braking. As a primary rural through-route, it also accommodates heavy vehicles, which further increases noise intensity and duration.

5. Low Ambient Sound / Lack of Noise Masking

Foxholes is a quiet, low-density village, meaning the natural ambient sound level is very low. In such environments, even moderate noise sources stand out starkly. With little competing sound, road and industrial noise becomes immediately noticeable and more stressful.

6. Lack of Natural Sound Barriers

The surrounding terrain is predominantly open countryside with minimal hedgerow, woodland, or topographical shielding. Without vegetation to absorb or scatter sound, the valley walls instead reflect it, further amplifying perceived volume.

Request for Monitoring and Independent Oversight

Given the above, and the likelihood of additional industrial noise from drilling rigs, generators, compressors, and flaring (particularly at night), we request the following conditions be attached in the event of approval:

1. Baseline Environmental Noise Survey
    - NYC must immediately undertake a baseline environmental noise survey, including daytime and night time dB levels along the B1249 through Foxholes.
    - The survey must take account of prevailing meteorological and topographical conditions.
2. Ongoing Noise Reporting
    - The operator (Egdon) must install continuous noise monitoring equipment at agreed locations.
    - Weekly reports must be submitted to NYC and made publicly available.
3. Independent Review
    - Although installation may be carried out by the operator, data collection, analysis, and reporting must be performed by an independent acoustic specialist.
    - NYC must verify all data independently to ensure compliance with local and national noise thresholds.
4. Verification of Drill Rig and Generator Noise
    - Specific dB levels for rigs, generators, compressors, and flare stacks must be disclosed.
    - These levels must be broken down into daytime and night time measurements, and measured at both the site perimeter and nearest residential receptors (including Wold Newton Primary School).

Conclusion

Without baseline environmental noise data and independent acoustic monitoring, the proposal risks compounding existing road noise impacts in a highly sensitive rural setting. The Wold Valley's unique acoustic characteristics mean that even moderate industrial activity may result in severe perceptual impacts on local residents and vulnerable receptors such as schools.

We respectfully urge NYC to fulfil its duty to protect environmental quality and public health by commissioning an immediate environmental noise survey and placing clear, enforceable conditions on any approved activity.

Artificial Light Pollution

Impacts on Residents and Rural Character

Acknowledging the Need for Safe Working Conditions

We fully recognise and support the requirement that any operational site must maintain adequate lighting to enable a workforce to operate safely and effectively, particularly during hours of darkness or reduced visibility. Site lighting is a necessary safety measure, and its importance is not disputed.

However, it is equally important that this need is balanced against the rights of local residents and the preservation of the rural environment. Lighting should not intrude unnecessarily into neighbouring properties, disturb sleep, or compromise the character of areas defined by their tranquillity and dark skies, such as the Yorkshire Wolds.

Government and Local Policy on Light Pollution

A Government research paper placed in the House of Lords Library, *Noise and light pollution: What's the harm?* (17 December 2024), defines light pollution as:

"Light shining where it is not intended or wanted. It is a source of annoyance to people, harmful to wildlife and undermines enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes."

The Yorkshire Wolds fall squarely into that description. The area is promoted for its unspoilt natural character, attracts significant tourism based on its dark skies and landscapes, and is home to a community that values peace, quiet, and rural serenity.

In the same report, the article *'The neglected pollutants: the effects of artificial light and noise on human health'* notes:

"Artificial light at night can influence human health by disturbing sleep and circadian rhythms."

The North Yorkshire Council itself defines light pollution as:

"The intrusion of over-bright or poorly directed lighting onto neighbouring properties , for example, a neighbour's security light spilling into a bedroom and preventing sleep."

Importantly, the council states that it is unreasonable to expect residents to take steps such as installing blackout blinds to mitigate such impacts. Where the light intrusion is unreasonable and persistent, it may be treated as a statutory nuisance.

However, under the Environmental Protection Act 1990, as amended by the Clean Neighbourhoods and Environment Act 2005, there is a relevant caveat:

“Premises used for transport purposes or where high levels of light are required for safety and security reasons are excluded from the Act.”

This means that if the drilling site is approved, residents could be lawfully subjected to intrusive light pollution, without recourse under nuisance legislation. Not because the intrusion is reasonable, but because the activity falls outside the Act’s protective scope.

Known and Unknown Effects

We know from the application that the development will include night-time activity and illumination, and that lighting will be needed for security and safety. We also know:

- The site is close to several residential properties.
- There will be temporary lighting towers, generators, and vehicle movements.
- Light will spill into the personal environment of local residents’ bedrooms, gardens, and shared amenity space.
- There is no clear modelling of light direction, glare, intensity, or shielding at this stage.

What is not known is how significantly each resident will be affected?

Some may experience minor nuisance; others may find it deeply disruptive to sleep, wellbeing, and the peaceful enjoyment of their home.

This lack of specific assessment does not reduce the seriousness of the potential harm, it simply makes mitigation and conditional control even more essential.

Key Questions

- Will artificial light and noise, often termed *"the neglected pollutants",* be given due consideration in this rural community, which prides itself on its dark skies, silence, and starlit tourism appeal?
- If this development proceeds, how will NYC ensure that essential safety lighting does not become excessive, unregulated, or harmful to those living nearby?

Considerations

The following specific, enforceable requirements should be met, regarding site lighting:

1. No Permanent Lighting Columns
    - No fixed lighting columns shall be installed as part of these works.
    - All lighting must be temporary and strictly necessary for site operations.

2. Minimal Use of Temporary Lighting Towers
    - The number of lighting towers must be kept to the absolute minimum required for safety.
    - Their use must be time-limited to essential operational periods only.

3. Automatic Controls
    - Lighting must be switched off when not required, and sensor-controlled lights used wherever practical, to reduce unnecessary exposure.
4. Shielding and Directional Control
    - All fixed lighting shall be:
        - Downward-facing, fully shielded from neighbouring properties.
        - Positioned and angled away from the village and nearby dwellings.
        - Designed to prevent upward or lateral light spill, especially toward sensitive receptors like homes and schools.
5. Height and Intensity Control
    - Task lighting must be kept at the minimum height and brightness necessary to enable safe working, and no higher.
    - Light intensity must comply with Institute of Lighting Professionals (ILP) guidance for rural zone E1/E2 areas.
6. Monitoring and Community Reporting
    - A mechanism should be in place to enable residents to report light pollution incidents to NYC.
    - An independent review should be undertaken if complaints arise, with enforcement where conditions are breached.

Conclusion

Rural communities like Foxholes should not be expected to absorb the full environmental cost of industrial activity without robust safeguards. Light pollution , though often overlooked, can be as harmful and intrusive as noise or traffic, particularly in quiet landscapes valued for their dark skies.

We urge North Yorkshire Council to uphold its own guidance and ensure that artificial lighting from this development is tightly controlled, independently monitored, and proportionate to its purpose.

Traffic Impact, Road Safety, and HGV Movements – Foxholes and Surrounding Routes

HGV Traffic: Discrepancies in Projected Numbers

In Egdon's planning application, it is stated that site operations will occur six days per week (excluding Sundays), except for drilling and flow testing, which will be conducted 24 hours per day, 7 days per week.

Egdon also provides daily traffic flow information for the B1249. This is based on data from 2023, which underestimates the current position regarding all vehicles and HGV's.

estimated HGV movements for each project phase. However, the figures submitted are inconsistent with the basic calculations based on working days and movement frequency. These discrepancies significantly underestimate actual HGV volumes, as shown below.

In their Traffic Management Plan, it is stated that the 'estimated' number of HGV movements, based on a 7 day week, are as follows:

1. Site Construction - 3 x 2 way movements per day (average) for 5 weeks (35 working days), giving a total of HGV's as 102. ***But 35 x 6 = 210 HGV's.***

2. Drilling - 4 x 2 way movements per day (average) for 8 weeks (56 working days), giving a total of HGV's as 214. ***But 56 x 8 = 448 HGV's.***

3. Testing - 4 x 2 way movements per day (average) for 4 weeks (28 working days), giving a total of HGV's as 48. ***But 28 x 4 = 112 HGV's.***

4. Site suspension and area reduction - 10 x 2 way movements per day (average) for 4 weeks (28 working days), giving a total of 136 HGV's. ***But 10 x 28 = 280 HGV's.***

5. Site decommissioning and restoration - 8 x 2 way movements per day for 6 weeks (42 working days), giving a total of 148 HGV's. ***But 42 x 8 = 336 HGV's.***

Total HGV's as stated by Egdon = 512. ***But it is actually 1,386***

This represents an increase of over 100% above Egdon's published total. A significant under-reporting of the true traffic burden.

Local Traffic Volumes and HGV Baseline

According to North Yorkshire Council (June 2025), the B1249 through Foxholes sees approximately 5,000 vehicles per day, with around 9% (≈450) of these being HGVs. This proposal would substantially increase the proportion of HGV traffic, placing additional stress on already burdened infrastructure and safety conditions in the village.

Butt Lane – Unsuitable for Industrial HGV Use

Egdon's screening submission states the application will *"consider the need for any improvement works to Butt Lane."* However, this is insufficient given the lane's current condition and classification:

- Butt Lane is a C-class road, not designed or classified for sustained HGV use.
- It is narrow, with damaged verges, multiple potholes, and several pinch points where two cars cannot safely pass.
- It is used daily by school buses, agricultural vehicles, refuse collection trucks, cyclists, and pedestrians.
- The national speed limit applies throughout its length until Wold Newton, thus creating additional risk due to inappropriate speeds for the road type.

Outstanding Questions:

- Can an HGV safely navigate both directions of the current layout?
- Where is the Swept Path Audit modelling interaction between drill rigs, tractors, school buses, and HGVs?
- Will there be time-of-day restrictions on HGV movements during school pick-up and drop-off times?
- Has conflict modelling been conducted for shared use by vulnerable road users?

Traffic Management Concerns in Foxholes

Foxholes & Butterwick Parish Council (FBPC) maintains ongoing discussions with NYC Highways and Traffic Enforcement regarding:

- Persistent speeding
- Lack of safe pedestrian footpaths or crossings
- Very limited traffic calming infrastructure

Speed Survey Evidence (January 2025):

Speed data was collected at three points within the village's 30mph zone:

- Southbound Traffic (towards the Butt Lane crossroads):
    - 57% of vehicles were travelling above the speed limit by over 10%.
    - Dangerous overtaking and acceleration occur regularly at the crossroads, before the speed limit ends.
    - Multiple RTAs have occurred at this location (observed by our County Councillor).

FBPC has repeatedly requested that the 30mph zone be extended south of the crossroads to improve visibility and reduce risk at the Butt Lane junction.

- Northbound Traffic (towards Scarborough):
    - 59% of vehicles exceeded the speed limit by more than 10%.
    - Mid-village, speeding is most dangerous where children cross the B1249 to access the school bus, and where there are no footpaths on either side.
    - FBPC has formally submitted a Pedestrian Crossing Assessment, meeting the required criteria, yet no progress has been made toward installing a zebra crossing.

Visibility and Access Risks:

- HGVs turning left onto Butt Lane from the B1249 will likely need to cross the opposite carriageway, creating conflict with oncoming traffic.
- HGVs exiting the site will need to turn right at a location where the speed limit is derestricted, with restricted visibility of downhill traffic from Driffield — a significant hazard.
- Additional HGVs will only compound these existing issues, making crossings more dangerous for children and pedestrians.

Additional Concerns and Requests for Clarity

- Will traffic assessments consider abnormal loads, particularly during construction and decommissioning phases?
- Is there an alternative route planned in the event of accidents etc?
- If planned routes or disposal methods must change mid-operation, does drilling halt pending further approvals?

Considerations

The following specific, enforceable conditions would be needed:

1. Route Restriction Conditions
    - Eastlands and Pump Road must not be used as HGV access routes under any circumstances.
2. Vehicle Monitoring and Transparency
    - Automatic Number Plate Recognition (ANPR) must be installed at the site entrance.
    - A weekly vehicle movement report must be submitted to NYC and made available for public scrutiny.
3. Implementation of Road Safety Measures
    - NYC must give serious and timely consideration to implementing FBPC's full list of speed and road safety recommendations, including:
        - Extension of the 30mph zone south of the crossroads.

- Introduction of a 40mph buffer zone at both village entries.
- Installation of a pedestrian crossing near Ganton Road/Smythy Lane.
- Footpath improvements and visibility measures.

Conclusion

Egdon's traffic estimates significantly understate the actual HGV burden. Combined with longstanding safety issues, the proposal poses unacceptable risks to residents, schoolchildren, and vulnerable road users without clear, enforceable safeguards.

We would require NYC to ensure that local safety concerns are fully addressed, not just acknowledged.

Impact on Agriculture

Agriculture is not only the backbone of rural economies, it is the ecological and economic lifeblood of communities like ours. The introduction of gas drilling operations, even conventional ones, poses significant and often under-appreciated risks to farmland, livestock, and long-term soil health. In addition to the issues of water contamination as previously discussed, where boreholes utilised for field irrigation may be rendered useless.

While conventional drilling is typically perceived as less invasive than hydraulic fracturing, it can still cause lasting damage to agricultural land. These impacts go beyond the physical footprint of the borehole or the water table issues already discussed, and extend into the chemical, microbial, and ecological functions of soil systems.

Gas Emissions from Conventional Drilling

Even in the absence of fracking, conventional gas operations can release a range of harmful substances:

- Methane (CH_4): Can leak from well casings, pipelines, and condensate tanks.
- Hydrogen Sulphide (H_2S): A highly toxic gas often found in sour gas formations, dangerous even at low concentrations.
- Volatile Organic Compounds (VOCs): Emitted from condensate tanks, drilling fluids, and leaking equipment.
- Combustion Byproducts: Including nitrogen oxides (NO_x), carbon monoxide (CO), and particulate matter from diesel engines and flaring.

These substances can either:

- Escape into the atmosphere and settle on land, or
- Migrate underground and disrupt subsurface soil layers.

Mechanisms of Soil Impact

1. Chemical Disruption

- pH Alteration: Gases such as H_2S dissolve in water to form acids (e.g., sulphuric acid), lowering soil pH and making it inhospitable to crops and soil biota.
- Toxin Accumulation: VOCs and hydrocarbons can adsorb to soil particles, impairing root growth and killing beneficial microbes.
- Anaerobic Conditions: Methane accumulation in soil displaces oxygen, creating oxygen-starved environments detrimental to aerobic soil life.

2. Loss of Organic Matter

- Reactive gases can degrade humic substances, diminishing soil structure, fertility, and water-holding capacity.

3. Soil Microbiome Disruption

Soil health depends on diverse microbial communities—fungi, bacteria, and archaea—that regulate nutrient cycling, organic matter decomposition, and plant resilience. Gas emissions can:

- Suppress beneficial species and select for extremophiles.
- Disrupt nitrogen and carbon cycling (e.g., denitrification, methanotrophy).
- Weaken plant-microbe symbioses, including nitrogen-fixing bacteria and mycorrhizal fungi.

This microbial imbalance leads to reduced soil resilience, impaired crop productivity, and potential knock-on effects on livestock health via fodder contamination.

Long-Term Soil Risks from Conventional Wells

Poorly sealed or aging wells can leak gases into surrounding soils for years, even decades. Studies show:

- Chronic Low-Level Leaks: Cause persistent degradation of microbial and nutrient functions.
- Delayed Ecological Recovery: Especially where contaminants become chemically bound to soil particles or migrate into deeper soil horizons.
- Invisible Damage: Much of this degradation occurs without surface indicators, making it easy to overlook until productivity drops.

Evidence from Research

UK-Based Studies

- A Durham University study (Boothroyd et al., 2016) of 102 decommissioned UK gas wells found that:
  “30% of sites had soil-surface methane concentrations significantly above background levels, indicating well integrity failure within 10 years of drilling.”
  (ResearchGate, Boothroyd et al., 2016)
- This methane leakage likely disrupts soil oxygen levels, affecting microbial life and biochemical soil processes, even in the absence of surface spills or visible damage.

Microbial Shifts from Methane and H_2S Exposure

- Cahill et al. (2025) found that methane leakage from a conventional well in British Columbia caused:
    - Methane oxidation by Methylocystis and Methylocella bacteria.
    - A distinct microbial community structure compared to background soils, indicating ecological disruption.
      (Frontiers in Environmental Science, 2025)
- A 2022 study from the Congolese coastal plains found that H_2S emissions from conventional drilling:
  Altered soil bacterial communities, boosting acid-tolerant phyla (e.g. Actinobacteria, Firmicutes) while reducing overall microbial diversity and soil health.
  (Frontiers in Soil Science, 2022)

Drilling Mud & Microbiome Impacts

- In the Barnett Shale, conventional drilling muds increased bacterial loads of sulphate-reducing and acid-forming species, displacing native soil microbiota and increasing the risk of soil acidification and metal mobilization.

Management and Mitigation Recommendations

To reduce the agricultural risks from gas operations:

- Comprehensive Leak Detection & Repair (LDAR) programs must be mandatory throughout the site lifecycle.
- Well integrity must be verified through independent inspection, particularly for casing and cement seals.
- Vegetative buffer zones should be established around the site perimeter to intercept airborne VOCs and particulates.
- Baseline and ongoing monitoring of soil microbial health is essential. Not just for pollution control but as a sensitive indicator of ecological impact.

Conclusion

The effects of gas development on agricultural soils are not just theoretical, they are well documented and increasingly evident across conventional fields, including here in the UK. While emissions may be less intense than with fracking, they are persistent, diffuse, and ecologically significant.

The loss of microbial diversity, reduction in soil fertility, and potential contamination of food-producing land should all be central considerations in planning decisions. Given the irreversible nature of some of these changes, we urge caution, rigorous assessment, and strong, enforceable mitigation conditions on any proposed development.

Environmental Considerations

Although the proposed drilling site does not currently lie within a formally designated sensitive area (e.g., Site of Special Scientific Interest or the Yorkshire Wolds National Landscape Designation (NLD), formerly AONB as of 2023), its proximity to sensitive areas is highly relevant. Specifically, the site falls within the 3.5 km visual sensitivity buffer of the Yorkshire Wolds NLD. This proximity introduces significant planning and environmental considerations.

Landscape Context: National Character Area (NCA) 27 — The Yorkshire Wolds

Natural England identifies 159 National Character Areas (NCAs), each with distinct landscape features, land uses, and ecological characteristics. The proposed development lies within NCA 27 – The Yorkshire Wolds, a region recognised for its chalk hills, steep valleys, and strong rural character.

Key Features of NCA 27:

- Rolling chalk landscapes: Escarpments, dry valleys, and open plateaux.
- Historic agricultural villages: Nestled within a matrix of arable farmland and pasture.
- Chalk spring-line rivers: Such as the Gypsey Race and Driffield Beck, are rare and biologically rich chalk streams.
- Woodlands and hedgerows: Remnant ancient woodlands and characteristic field boundaries.

Planning Framework & Stewardship Guidance

NCA 27 plays a critical role in shaping sustainable development, conservation, and land-use policy. It is guided by Natural England's Statement of Environmental Opportunity (SEO) and the Countryside Stewardship priorities, which emphasize:

1. Woodland & Biodiversity Enhancement

- Restoration of ancient and broadleaf woodlands.
- Strengthening woodland connectivity for wildlife, water quality, and flood resilience.

2. Landscape & Heritage Protection

- Restoration of hedgerows, stubble fields, field margins, and historic ponds.
- Conservation of permanent grassland and traditional boundaries to protect the rural character.

3. Integrated Environmental Benefits

- Actions supporting soil health, water quality, flood mitigation, and habitat connectivity.
- Targeted catchment management, particularly for the Derwent, Hull, and Foulness rivers.

This guidance informs both local planning decisions and agri-environment schemes, including Farming in Protected Landscapes (FiPL).

Yorkshire Wolds: Pending National Landscape Designation (NLD)

Although formal AONB status is pending, Natural England has reclassified such areas as National Landscapes since 2023. The Yorkshire Wolds NLD proposal—spanning inland chalk hills (Goodmanham to Folkton) and coastal cliffs (e.g., Flamborough Head)—underwent public consultation between October 2024 and January 2025.

If designated, the NLD would gain:

- Legal Management Plans and planning influence.
- Enhanced funding eligibility for conservation and rural economy schemes.
- Stronger protections for views, tranquillity, and cultural heritage.

Importantly, the NLD status would increase the weight of objections or conditions related to industrial activity within the buffer zone.

Chalk Streams: Rare and Under Threat

The Yorkshire Wolds are home to the most northerly chalk streams in Britain, including the Gypsey Race and Driffield Beck, ecosystems of international conservation importance. These streams, fed by chalk aquifers, support diverse aquatic life, from invertebrates to breeding fish and specialist plant communities.

Threats from Drilling Operations:

- Groundwater abstraction and aquifer contamination pose serious risks to flow, chemistry, and biodiversity.
- Even small-scale leakage or hydrological disturbance can lead to irreversible habitat damage in these fragile systems.

Chalk Stream Restoration Strategy

In June 2022, the UK government launched an Implementation Plan for chalk stream restoration, led by the Chalk Stream Restoration Group (chaired by Charles Rangeley-Wilson). This includes major work across Yorkshire.

Case Study: Gypsey Race Enhancement Project

- A £110,000 habitat project created new ponds to filter runoff and reduce silt and nutrient pollution.
- Over 600 m of river channel was reprofiled, including the addition of woody debris and meanders to improve flow diversity and uncover spawning gravels.

- Result: Improved habitat quality, increased ecological resilience, and better flood regulation.

Future Vision: The ‘Chalkshire’ Partnership

- A collaborative effort involving Yorkshire Water, Natural England, Yorkshire Wildlife Trust, and East Riding Rivers Trust.
- Focus: Engaging landowners and communities to develop a catchment-wide restoration strategy.
- Goals: Long-term resilience, public engagement, and cultural revaluation of chalk stream heritage.

Conclusion

Though not formally within a designated conservation site, the proposed drilling operation lies within an area of high landscape sensitivity and ecological value, as defined by Natural England’s characterisation and stewardship priorities.

With the Yorkshire Wolds NLD designation pending, any industrial development within the visual or hydrological influence of the area could undermine:

- Conservation efforts,
- Chalk stream restoration progress,
- Local environmental policy,
- And public support for protected landscapes.

The risks to biodiversity, water systems, and landscape integrity demand precautionary planning, especially in light of national and regional objectives to enhance nature and protect rural heritage.

Landscape and Visual Amenity Impact

The proposed development lies within a highly valued and scenic rural setting, at the heart of *Yorkshire's 'Golden Triangle'* of protected and celebrated landscapes, the Yorkshire Dales, North York Moors, and Yorkshire Wolds. This wider landscape matrix is not only ecologically and culturally important but is also a major draw for tourism and recreation, with views and tranquility forming part of the area's economic and social capital.

Visual Intrusion from the Proposed Drilling Rig

The proposal includes the installation of a 38-metre-high drilling rig, which would:

- Visually dominate the local skyline during the initial phase (operational for up to six weeks).
- Be highly visible from surrounding open countryside, ridgelines, and key public rights of way.
- Potentially impact long-distance views into and out of the proposed Yorkshire Wolds National Landscape (formerly AONB).

The site lies approximately 900 metres from the proposed National Landscape boundary and is well within the 3.5 km visual sensitivity buffer identified for the Yorkshire Wolds. As such, the visual amenity impacts must be considered significant and require robust assessment.

Policy Context – MWJP Policy D04 & M16 (North Yorkshire Joint Minerals and Waste Plan)

Policy D04 – Development Affecting Protected Landscapes

Part 3 of Policy D04 clearly states that minerals and waste development must not have an unacceptable harmful effect on the setting of designated landscapes, including proposed National Landscapes.

"Permission will not be granted for such proposals where they would result in unacceptable harm to the special qualities of the designated area or are incompatible with their statutory purposes." (Policy D04, MWJP)

Given the site's close proximity and visual connectivity to the Yorkshire Wolds National Landscape designation, strict adherence to this policy is essential.

Requirement for Detailed Landscape and Visual Impact Assessment (LVIA)

In accordance with Policy M16(d1) and relevant EIA guidance, any planning application must be accompanied by a robust and site-specific Landscape and Visual Impact Assessment, including:

- Assessment of views to and from the proposed National Landscape from key public viewpoints, including footpaths, bridleways, heritage assets, and local road corridors.

- Photomontages or wireframes to illustrate the short-term and cumulative visual impacts of the rig structure and associated infrastructure.
- Consideration of seasonal variation, especially in a landscape characterised by open views and low woodland cover.
- Evaluation of cumulative impact alongside existing vertical infrastructure (e.g. telecoms masts, farm buildings, electricity pylons).

Where visual intrusion affects perceptual qualities of the landscape such as tranquillity, remoteness, or panoramic visibility, these too should be explicitly assessed.

Conclusion

The site's location—within the visual setting of the pending Yorkshire Wolds National Landscape—demands a precautionary and policy-compliant approach. The scale and temporary nature of the drilling rig do not negate its potential to cause unacceptable harm to the setting and character of the surrounding landscape, particularly in an area identified for enhanced statutory protection.

Failure to robustly assess and mitigate these impacts would be contrary to Policies D04 and M16 and would present a material risk to planning approval.

Seismic Activity and Monitoring

Regional Seismic Context

The British Geological Survey (BGS) has monitored seismic activity in the Vale of Pickering, which includes the Foxholes area. This region is generally characterised by low natural seismicity, with few recorded earthquakes of note. However, it is not entirely without precedent: in January 2011, a magnitude 3.6 earthquake occurred near Ripon, which was felt across North Yorkshire, including in York and Malton [BGS].

To support environmental baseline studies in regions targeted for subsurface energy exploration, the BGS installed a dense network of seismic sensors across the Vale of Pickering in 2015. This network—funded by the former Department for Business, Energy and Industrial Strategy (BEIS)—was designed to establish baseline seismic data, enabling clear distinction between natural tectonic activity and any induced seismicity potentially caused by subsurface drilling or gas extraction [Earthwise BGS].

Geological and Structural Considerations

The Foxholes area lies on complex chalk geology. Geological surveys, including those by the Hull Geological Society, have documented structural features near the village, including:

- Exposure of the Burnham Chalk Formation in a local disused quarry.
- A monoclinal fold with a steep limb, indicative of significant historic structural deformation.
- A dextral-normal fault zone, which provides evidence of active or past tectonic movement in the subsurface.

While these features may not directly indicate ongoing seismic risk, they underscore the geological sensitivity of the local subsurface environment and reinforce the importance of cautious monitoring during intrusive ground operations.

Land Stability and Construction Risk

North Yorkshire Council has issued general guidance on land movement risks, including sinkholes, subsidence, and landslips. NYC currently assesses the risk of ground instability in the Foxholes area as low, but notes that any anomalies or concerns should be reported promptly to local authorities for investigation.

Notably, several residential properties in and around Foxholes are of chalk construction and lack modern foundations, making them potentially more vulnerable to ground vibration, movement, or settlement arising from industrial activity.

Gas Exploration – Precautionary Principles

In February 2025, North Yorkshire Council concluded that the gas exploration proposal near Foxholes would not require a full Environmental Impact Assessment (EIA) under current thresholds. However, the council recommended that targeted technical assessments be carried out to address specific risks, including:

- Ground vibration and induced seismicity,
- Noise and operational disturbance, and
- Flooding or water-table interference.

Given that the Foxholes area has not previously hosted gas exploration operations, the impacts of subsurface drilling on local geology and settlement are unknown. Therefore, it is critical that robust baseline data be obtained and made publicly available, and that real-time seismic monitoring be incorporated into any planning or operational framework.

Recommendations and Community Safeguards

In light of the above, we strongly recommend the following:

1. Up to date seismological data can be gathered prior to any development, using high-resolution, real-time monitoring techniques.
2. A site-specific seismic risk assessment mustl be undertaken, including vulnerability assessments for nearby properties, particularly those with chalk walls or without foundations.
3. A precautionary planning approach, similar to that applied during shale gas testing at Preston New Road (Lancashire), where induced seismicity from Cuadrilla's horizontal drilling operations led to real-time monitoring requirements and a 'traffic-light' system for operational thresholds.
4. Local residents and property owners are consulted and informed throughout the process, with transparent disclosure of all monitoring results and mitigation measures.

Conclusion

Although seismic risk in the Foxholes area is historically low, the introduction of subsurface energy exploration introduces uncertainties and potential sensitivities, particularly given the chalk geology and the construction vulnerability of some dwellings. A precautionary, data-driven, and community-informed approach is essential to uphold safety, minimise risk, and ensure compliance with national guidance on induced seismicity.

Nearby Airfields and Safeguarding

In UK planning applications for gas drilling, local airfields are considered statutory consultees only under specific circumstances. Their role in the planning process depends on proximity, type of operations, and potential safety or operational impacts.

1. Not Automatically a Statutory Consultee

Local airfields are not automatically statutory consultees under the Town and Country Planning (Development Management Procedure) (England) Order 2015 unless:

- The proposed development falls within safeguarding zones around airports or aerodromes.
- The Civil Aviation Authority (CAA), National Air Traffic Services (NATS), or the Ministry of Defence (MOD) have identified a need for consultation due to air safety concerns (e.g. proximity to radar installations or flight paths).

2. Airfield Responses Often Come Through Safeguarding

Many civil and military airfields are covered by safeguarding maps. If the proposed gas drilling site lies within such an area:

- The operator of the airfield (e.g. airport authority or MOD) will be consulted.
- They may submit objections or requests for conditions if they believe the development poses a risk to air navigation safety, such as:
    - Tall rigs obstructing flight paths
    - Gas flares interfering with navigation systems
    - Lighting confusion or wildlife attraction
    - Electromagnetic interference with radar

3. General Aviation (GA) Airfields

Smaller or private airfields (often used for general aviation) may not have formal safeguarding zones. However, they can still:

- Submit comments as an interested third party during public consultation.
- Raise awareness of potential safety or operational issues.
- Engage with the local planning authority (LPA) directly.

Their input is considered by the planning authority, though it may carry less weight than that of statutory consultees unless a clear planning or safety issue is demonstrated.

Foxholes Context

Locally, If an airfield raises an objection, the Local Planning Authority (LPA) will log it as a material consideration. Whether it's classified as an environmental issue depends on:

- Whether it affects air, land, water, biodiversity, noise, light, etc.
- Whether it’s part of an Environmental Impact Assessment (EIA).
- Whether it's framed in terms of public health, amenity, or ecology.

Nearby Airfields and Safeguarding Overview

Eddsfield Airfield

- A small private grass-strip airfield near Langtoft, around 13 km north of Driffield.
- Offers light general aviation operations, refuelling, club facilities, and limited circuit traffic.
- Not on the official statutory safeguarded list, so no formal safeguarding zone applies under national planning direction.

Beverley / Linley Hill Airfield

- Another small-scale private strip roughly 13 km south-east of Driffield
- Also not included among officially safeguarded aerodromes.

RAF Topcliffe

- An active MOD airfield and gliding site near Topcliffe, North Yorkshire, around 15–20 km away.
- As an operational military aerodrome, it is not included under civil aerodrome safeguarding, but MOD may have separate safeguarding protocols.

Considerations

- Distance to runway or circuit. Could affect safety margins.
- Helicopter operations, especially in support of offshore gas, air ambulance, or police work.
- Airspace classification and traffic patterns
- Environmental impact on aviation (e.g. noise, birds, emissions)

Community Impact

Potential Community Benefits – A Critical Assessment

Proposed gas drilling operations near rural communities, such as the site near Foxholes, are often promoted on the basis of certain economic and national energy advantages. While some benefits may indeed materialise, they must be rigorously scrutinised in light of the local context, community needs, and environmental sensitivities. Below is a balanced overview of potential benefits, alongside an honest assessment of their likely scale, relevance, and deliverability.

1. Economic Benefits (Theoretical vs Realistic)

Claimed Benefits:

- Job Creation: Short-term employment during site construction, drilling, and demobilisation.
- Boost to Local Businesses: Temporary increase in demand for accommodation, food services, transport, and supplies due to incoming workers.
- Supply Chain Contracts: Potential for local firms to benefit from construction, logistics, and maintenance contracts.

Reality Check:

- Most technical and operational roles are highly specialised and fulfilled by mobile contractors from outside the region.
- The duration of any local economic uplift is very limited, often lasting only a few weeks to months.
- Local employment is likely to be confined to a handful of temporary, low-skilled roles, such as security or site access control.
- As acknowledged in an email from Rachel Smith (Egdon Resources):
  "For the exploration phase... there will be employment for local businesses related to site construction, transportation, security, as well as support for local businesses through accommodation, shops and food outlets etc."

2. Community Investment and Compensation

Claimed Benefits:

- Community Benefit Payments: Some operators may offer lump-sum contributions (e.g. £100,000 per well under historic shale gas frameworks).
- Infrastructure Improvements: Road repairs or access routes may be funded by developers.
- Future Community Fund (if production is approved): Egdon indicates that a community fund would be established in the event of commercial development.

Reality Check:

- These benefits are discretionary and often tied to later stages of development, not the current exploration phase.
- Previous experiences at other Egdon sites suggest inconsistency in the implementation and transparency of Community Liaison Groups (CLGs) and benefit funds.
- The scale and governance of any community contribution remain vague. Who determines its value? Who controls the fund? For how long?
- There is no guarantee that Foxholes or surrounding villages would see any tangible return.

3. National Energy Security

Claimed Benefits:

- Reduced reliance on imported gas.
- Improved energy resilience during geopolitical crises.
- Lower pre-combustion carbon emissions compared to imported LNG.

Reality Check:

- These are macro-scale benefits that do not translate into local gains, particularly for a village like Foxholes that is not even connected to the national gas grid.
- The primary beneficiaries are Egdon, its parent Heyco Group, and Petrichor Partners, a venture capital firm.
- Any gas extracted will enter the national or international energy market, with no direct supply or cost benefit to the local population.

4. Potential for Lower Energy Bills (Highly Unlikely)

- While theoretically, increased domestic gas supply could reduce wholesale prices, in practice, UK gas prices are set by global markets.
- Multiple studies (including by the Climate Change Committee) have found no meaningful impact of domestic gas production on consumer bills.

5. Skills and Training Opportunities (Improbable in This Context)

Claimed Benefit:

- Operators may partner with training providers to offer apprenticeships in engineering, geology, logistics, or environmental monitoring.

Reality Check:

- No such offers have been made locally.

- There is no established programme or commitment from Egdon for local skills development.
- The exploration phase is too brief to justify or sustain meaningful training opportunities.

Important Caveat: Conditional and Uneven Benefits

While some of the above benefits may sound compelling in theory, real-world outcomes depend entirely on:

- The duration and scale of drilling activity;
- The regulatory framework and enforcement;
- The genuine commitment of the operator to transparent community engagement and benefit-sharing;
- The community's ability to influence planning and hold developers accountable.

Experience across the UK shows that without robust legal safeguards, communities are often left with the impacts but little of the benefit.

Community Participation: The Critical Missing Piece

Harnessing the local voice is not just a matter of good practice—it is essential for democratic legitimacy and environmental justice. Drawing on best-practice frameworks such as Ezeh et al. (2024), the following strategic approaches are recommended:

1. Early and Inclusive Engagement

- Pre-application consultation at Foxholes was inadequate: a 4-hour Bank Holiday weekend, Friday afternoon drop-in session.
- Despite requests, Egdon has thus far refused to attend open public meetings.
- No inclusive stakeholder mapping or online consultation options were offered.

2. Community Liaison Groups (CLGs)

- At Wressle, CLG effectiveness was mixed—some groups dissolved or lacked transparency.
- At Foxholes, no CLG has yet been established.
- There is currently no platform for residents to review data, raise concerns, or track mitigation.

3. Strengthening Local Influence

- Residents were not offered guidance on engaging with the planning process.
- No planning aid support or plain-English guides were made available.
- Consultations were minimal and poorly advertised.

4. Citizen Science and Evidence Gathering

- No support for participatory mapping or baseline studies (e.g. biodiversity, noise, water quality).
- Residents were left to commission or organise their own expert input.

5. Legal and Financial Leverage (S106 & CBFs)

- Unclear if a Section 106 agreement will deliver local benefit. Any such funds from NYC may not reach Foxholes.
- For Wold Newton (in East Riding), no clear pathway exists to benefit from the application.
- Community Benefit Funds should be independently governed, but no such framework has been presented.

6. Climate Impact Assessment: The Finch Ruling

- Following the 2024 Supreme Court ruling (R (Finch) v Surrey), any approval must account for downstream emissions.
- The climate implications of new fossil fuel developments must be publicly consulted and form part of material planning consideration.

7. Raising the Profile

- If community concerns are marginalised, residents should:
    - Seek call-in by the Secretary of State;
    - Engage local and national media;
    - Work with national advocacy groups (e.g. CPRE, Friends of the Earth).

Local Business and Environmental Risk

Dependence on Chalk Aquifer

- Local agriculture increasingly relies on boreholes for irrigation—vital in a changing climate.
- Wold Top Brewery and Spirit of Yorkshire Distillery both rely on clean, chalk aquifer water for brewing and distillation.
    - Pollution of this aquifer would be catastrophic for their operations, local employment, and reputation.
    - These are sustainable, regenerative businesses that represent the future of rural enterprise.

Tourism and Rural Economy

- Foxholes is surrounded by heritage landscapes and sits on the edge of the proposed Yorkshire Wolds National Landscape (AONB).
- Local guest houses, glamping pods, and farm stays rely on the area's natural beauty and tranquillity.
- Drilling operations—with rigs, noise, and industrial activity—directly threaten this growing visitor economy.

Conclusion

Foxholes and the surrounding area stand on the cusp of National Landscape designation, with increasing potential for sustainable, tourism-driven prosperity.

A short-term, speculative gas exploration scheme threatens to undermine this future for uncertain, minimal, and largely external benefits.

Gas drilling proposals are inherently contentious. Where they arise, clear, enforceable safeguards, genuine community engagement, and environmental integrity must take precedence. Failing that, communities must be empowered to say no. Loudly, legally, and collectively.

Compliance

Compliance with the Minerals and Waste Joint Plan (MWJP)

The Minerals and Waste Joint Plan (MWJP) for York and North Yorkshire, adopted in March 2022, outlines stringent criteria for all onshore oil and gas development. These requirements are designed to safeguard local landscapes, communities, and ecosystems from unacceptable impacts. The current application raises significant concerns across several key MWJP policy areas.

1. Landscape and Visual Impact

The proposed drilling site is situated approximately 900 metres from the current boundary of the Yorkshire Wolds Area of Outstanding Natural Beauty (AONB), placing it within the zone of visual and landscape sensitivity. While the AONB boundary is under review, the area remains protected in policy terms.

The introduction of a 38 metre high drilling rig, associated compounds, lighting, and vehicular infrastructure would disrupt the visual integrity of the landscape. This development would introduce industrial-scale structures to a predominantly rural and scenic setting, contrary to the MWJP's requirements to preserve landscape character and visual amenity.

2. Environmental and Amenity Effects

The proposed operation involves continuous (24-hour) drilling and flow testing. This raises concerns regarding:

- Noise Pollution – Especially during nighttime operations, affecting nearby residential areas and wildlife.
- Light Intrusion – Illumination from the rig and security infrastructure would alter the natural lightscape, disrupting nocturnal ecosystems and tranquillity.
- Heavy Goods Vehicle (HGV) Traffic – The applicant's data indicates potentially high HGV movements, leading to increased noise, road wear, congestion, and air pollution in and around Foxholes and nearby settlements.

3. Proximity to Sensitive Areas

The site lies less than 800 metres from the current AONB boundary. Any adverse environmental effects from emissions, noise, or pollutants could directly impact the protected area. Given the ecological and landscape importance of the Yorkshire Wolds, this proximity presents a serious risk of degradation, contravening the precautionary principle embedded in both MWJP and national policy.

4. Environmental Impact Assessment (EIA)

NYC has previously issued a Screening Opinion indicating that an EIA is not required. However, this conclusion is disputed. The applicant's claim that the development would not have "significant effects" under EIA Regulations fails to account for:

- Local biodiversity and sensitive ecosystems
- Impact on air and water quality
- Downstream greenhouse gas emissions
- Effects on human health, landscape, and cumulative impacts

We would again urge NYC to require a full Environmental Impact Assessment before any further consideration of this application. The EIA should cover all relevant topics including, but not limited to: hydrogeology, emissions, lighting, visual impact, ecological sensitivity, climate impact, and traffic.

5. Climate Change and Legal Context – The Finch Ruling (2024)

The Supreme Court's Finch ruling mandates that downstream (consumer-related) greenhouse gas emissions must be considered in planning decisions. This includes emissions from:

- Transport of extracted hydrocarbons
- Refining, combustion, and final use by consumers
- Future phases of development

The applicant must submit a full Greenhouse Gas Emissions Assessment, incorporating Scope 1, 2, and 3 emissions, to comply with the ruling. This aligns with both the MWJP and national net-zero legislation.

6. Alignment with National Net Zero Commitments

In light of the UK's legal obligation to achieve net zero greenhouse gas emissions by 2050, and interim goals for 2035, any new fossil fuel development must pass a stringent climate test. Relevant commitments include:

- Full decarbonisation of electricity by 2035
- Phase-out of fossil fuel heating systems
- Zero tailpipe emissions for vehicles by 2035
- Decarbonisation milestones in industry, agriculture, and transport
- Clean electricity powering the majority of the economy by 2035

This application is incompatible with the direction of national policy and climate law.

7. Pollution Control and Membrane Requirements

Gas drilling sites must comply with the Environmental Permitting Regulations (2010) and the Mining Waste Directive. This includes:

- Use of impermeable HDPE membranes to prevent leachate contamination
- Full bunding of storage tanks and containment areas
- Groundwater discharge permits and surface water drainage schemes
- Long-term monitoring and management of contamination risks

Failures of HDPE membranes, while rare, can and do occur—especially in karstic chalk geology. A detailed hydrogeological risk assessment is essential.

Note: The EA's 2016 objection to the Markwells Wood proposal, on grounds of groundwater risk, sets a precedent. Where risk to aquifers is not mitigated to an acceptable level, development must be refused.

8. Community Opposition and Amenity Impacts

Residents of Foxholes and the surrounding area (formal opposition TBC) have voiced grave concerns, including:

- Noise and light pollution
- Water contamination
- Air quality deterioration
- Increased traffic and road safety
- Public health risks
- Loss of rural character

Their concerns must be given substantial weight under the Localism Act and the National Planning Policy Framework (NPPF), which emphasise meaningful community involvement in planning decisions.

9. Local and Regional Planning Policy Compliance

This proposal must demonstrate full compliance with the Minerals and Waste Joint Plan, Ryedale Local Plan (2012–2027), and emerging North Yorkshire Local Plan. Relevant policy tests include:

- Safeguarding biodiversity, water, and air quality
- Avoidance of harm to designated landscapes and protected areas
- Demonstration of sustainable development and minimal environmental impact
- Full climate impact assessment including downstream emissions

10. Section 106 (S106) Obligations

Should the development be approved, a legally binding S106 agreement must be negotiated to mitigate harm. Possible obligations include:

- Road improvement and traffic control measures
- Noise monitoring and abatement infrastructure
- Groundwater baseline monitoring and long-term testing
- Community benefit contributions (e.g., funding for schools, health, or local amenities)
- Restoration obligations post-drilling

The S106 agreement must meet legal tests of necessity, proportionality, and direct relevance to the development.

11. Best Practice and Operator Conduct

At the exploratory stage, it is critical that codes of conduct for Egdon employees and contractors be disclosed and reviewed, including:

- Whether all protocols meet current industry standards
- Last review and update dates for operational procedures
- Any adjustments made following incidents at other sites
- Confirmation that all staff have received and signed off on appropriate training

Conclusion

This development raises serious and unresolved questions concerning landscape impact, climate law compliance, community welfare, and environmental risk. It conflicts with multiple strands of planning policy at local, regional, and national levels.

Summary

- Planning Policy: Emphasise the need for compliance with the MWJP, Ryedale Local Plan, and emerging NY Plan.
- Environmental Impact: Demand a comprehensive EIA, covering all climate, ecological, and amenity risks.
- Community Representation: Amplify local concerns and stress democratic accountability.
- Precautionary Principle: Where there is risk of serious or irreversible environmental harm, decision-makers must err on the side of caution.

Climate Change

While natural gas is often portrayed as a transitional or "cleaner" fossil fuel relative to coal, its environmental impact remains significant. Methane, a greenhouse gas over 80 times more potent than CO_2 over a 20-year period, can escape at various stages of extraction, processing, and transport. These fugitive emissions directly undermine the UK's statutory commitments to carbon reduction under the Climate Change Act 2008 and international obligations under the Paris Agreement.

Moreover, recent legal developments have materially changed how downstream emissions i.e. those arising from the eventual combustion of fossil fuels, must be considered in planning decisions.

Egdon Resources' Previous Reliance on Outdated Legal Framework

In October 2022, Egdon Resources, the applicant in this case, continued to rely on a pre-Finch legal interpretation during its appeal against the refusal of permission for oil production at Biscathorpe. Crucially, at the appeal hearing, Egdon failed to inform the Planning Inspector that its Environmental Statement was outdated and no longer compliant with evolving legal standards. Specifically, it omitted to acknowledge that downstream greenhouse gas emissions could constitute a material planning consideration under the Environmental Impact Assessment (EIA) regime.

This precedent raises serious questions about the credibility and adequacy of the applicant's current submission. Given the Supreme Court's subsequent judgment in R (Finch) v Surrey County Council, it is imperative that any new application, including exploratory drilling, fully addresses the cumulative climate impacts of the proposed development.

Finch Supreme Court Ruling (June 2024)

In R (Finch) v Surrey County Council, the UK Supreme Court issued a landmark decision that redefines how planning authorities must assess fossil fuel proposals under the EIA Directive.

Key Legal Findings:

- Background: The case concerned planning permission granted for expanded oil production at Horse Hill in Surrey. The appellant challenged the permission on the basis that the environmental statement failed to consider the climate impact of downstream (Scope 3) emissions—that is, emissions released when the extracted oil was eventually burned.
- Judgment: The Supreme Court ruled in favour of the claimant, holding that downstream emissions from combustion are an indirect but foreseeable environmental effect and must be assessed under the EIA Directive (Directive 2011/92/EU, as retained in UK law).
- Legal Principle Established: The ruling establishes that local planning authorities cannot ignore the full lifecycle emissions of fossil fuel developments. This includes greenhouse

gases emitted not just during extraction and site operations, but also those resulting from the product's end use by consumers.
- Implications: The judgment immediately affected other fossil fuel projects, including the revocation of planning permission for the proposed coal mine in West Cumbria, where inadequate consideration of downstream emissions was a central issue.

Implications for the Current Application

In light of Finch, the current application must include a robust and quantitative assessment of:

- Full lifecycle greenhouse gas emissions, including those released when the extracted gas is eventually combusted;
- Cumulative climate impacts, especially if this exploratory phase leads to longer-term extraction and commercialisation;
- Policy compatibility, particularly with:
    - The UK's legally binding net-zero by 2050 target;
    - The 2035 goal of a fully decarbonised power system;
    - The climate mitigation duties placed on local planning authorities under the Planning and Compulsory Purchase Act 2004 and the Climate Change Act 2008.

Downstream emissions are an inevitability of extracting gas, and their impact on the environment must therefore be considered at the planning stage. Failure to assess downstream emissions in line with Finch would render the application legally flawed and vulnerable to judicial review. A full Environmental Impact Assessment (EIA) incorporating these emissions is now not just good practice, it is a legal necessity.

Conclusion

Any determination of this planning application must reflect both the environmental reality of fossil fuel development and the legal precedent set by R (Finch). In accordance with the ruling, and with national and regional policy objectives, the climate impact of this proposal, particularly its downstream emissions, must be fully and transparently assessed.

Should the applicant fail to provide such an assessment, the application should be rejected outright or, at a minimum, be deemed incomplete and invalid pending a revised submission with a legally compliant Environmental Impact Statement (EIS).

Conclusion

Egdon Resources justification for this application

1. Domestic gas enhances UK energy security

Claim: UK gas from Foxholes reduces reliance on imports, boosting energy resilience. Egdon portrays onshore gas as a bridge resource during the UK's transition to low carbon energy.

Reality:

- Scale matters: The estimated resource (63 billion cubic feet of gas - Bcf) at Foxholes is small, relative to UK gas demand (2,500 - 2,800 Billion cubic feet/year). Production would be spread over multiple years, so annual contribution would be less than 1% of UK needs. This site would barely dent import needs.
- Gas is traded globally: UK gas prices are set by international markets, not local supply. Even domestic gas enters the national grid at market rates, so prices wouldn't fall for consumers.
- No strategic storage: Without state controlled reserves, small onshore wells have minimal security value, compared to large North Sea fields or LNG partnerships.
- UK reliance on Norwegian pipeline gas and LNG diversity already ensures relatively strong security compared to mainland Europe.
- Short-term shocks (e.g. 2022 LNG spike) don't justify long-term infrastructure. Gas markets are now stabilising, and energy strategy must focus on long-term resilience. Short-term crises don't justify long-term fossil lock-in.

Verdict:

The claim is overstated. Small-scale UK onshore gas has a negligible impact on national energy security.

As the UN secretary general, Antonio Guterres, recently said:

"We are on the cusp of a new era. Fossil fuels are running out of road. The sun is rising in a clean energy age."

Guterres said countries seeking energy security against geopolitical threats and lower costs for consumers amid a global cost-of-living crisis must choose renewables.

"The greatest threat to energy security today is fossil fuels. They leave economies and people at the mercy of price shocks, supply disruptions and geopolitical turmoil," he said. *"There are no price spikes for sunlight. No embargos on wind."*

2. It aligns with the UK Government Energy Strategy.

Claim: Supports domestic production goals under the Energy Security Strategy.

Reality:

- While the 2022 Energy Security Strategy did encourage domestic hydrocarbons, the government has since pivoted strongly back toward clean energy, with updated Net Zero targets, new offshore wind and hydrogen investment, and a reinstated fracking moratorium.
- The Climate Change Committee (CCC) and National Infrastructure Commission have explicitly warned against new fossil fuel developments, citing carbon lock-in and policy inconsistency.
- The UK's 6th Carbon Budget requires rapid fossil fuel phase-down. Onshore gas doesn't align with that legally binding pathway unless it's fully abated, and the Foxholes development proposes no such capture.

Verdict:

There is weak alignment seen. UK policy increasingly prioritises net zero over fossil expansion, especially onshore.

3. It brings economic and environmental benefits

Claim: Local jobs, tax revenue, and lower emissions than imports.

Reality:

- Job creation is very limited. Onshore exploration requires a highly specialised, small workforce, often brought in temporarily.
- Tax benefits depend on successful production, which is speculative at the exploration stage. Local councils may receive little direct fiscal benefit.
- Emissions comparison is misleading: While LNG import emissions are higher per unit, the UK's climate targets are absolute, not comparative. New gas supply still adds upstream and downstream CO_2, which must be offset elsewhere to stay on budget.
- Methane leakage (from drilling and flaring) is also a concern. Even small leaks disproportionately affect the climate due to methane's potency.

Verdict:

This claim is partially true at best, but incomplete . Whilst there may be some short-term economic activity, climate and emissions trade-offs remain significant.

4. It’s a transition fuel supporting renewables

Claim: Gas serves as a backup fuel while renewables scale up.

Reality:

- This argument was more valid a decade ago. In 2025, the grid now needs flexibility, storage, and demand management, not more baseload gas.
- The CCC notes that new gas isn’t needed to meet energy demand even under conservative scenarios.
- Infrastructure like Foxholes is incompatible with long-term decarbonisation, as it locks in gas use until late 2030's or 2040's, when demand should be falling.
- No carbon capture, usage, or storage (CCUS) is planned at Foxholes, so emissions would be unmitigated.

Verdict:

The logic is increasingly outdated and short sighted. In 2025 onwards, the grid needs clean flexibility, not new fossil extraction.

Closing thoughts

This is not a routine planning application. It is a proposal to drill through a legally protected aquifer supplying hundreds of thousands of people, using techniques that could propagate fractures and contaminants in unpredictable ways. Even if the risks are low probability, the consequences are **catastrophic** should they occur.

NYC and regulators must apply the precautionary principle:

Where there is scientific uncertainty about potentially serious or irreversible environmental or health harm, decisions should err on the side of caution, and development should not proceed unless risks can be clearly ruled out or mitigated.

The precautionary principle requires planning authorities to ask:

- Can we guarantee no harm to local groundwater (the principal chalk aquifer under the site)?
- Can we be certain there will be no long-term health effects from air pollution, noise, or flaring?
- Do we know that cumulative climate impacts from additional gas extraction are acceptable under the UK’s Net Zero and carbon budget obligations?
- Are there gaps in evidence around methane leakage, local biodiversity impact, or infrastructure vulnerability?

If the answer to any of those is ***"we're not sure"*** or **"*evidence is lacking,"*** then under the precautionary principle, approval should be withheld until certainty or effective mitigation is demonstrated. Effective mitigation would require and demand world-class environmental protection and absolute transparency.

Egdon does propose mitigation measures to limit harm, such as impermeable membranes and traffic controls. But even then.....***'mitigation'*** **does not mean eliminating risk altogether, rather, attempting to lessen the severity or likelihood of harm.**

These measures cannot fully eliminate the risk to the underlying chalk aquifer, nor can it offset the climate impacts of new fossil fuel extraction. Particularly in the absence of a full Environmental Impact Assessment and long-term monitoring framework, such mitigation remains speculative, and insufficient under the precautionary principle.

Can we afford to take the risk with our water and food security and the health of our community?

The Yorkshire Wolds are a living landscape. This isn't just land. It's history, memories, identity, and home.

We're drawing a line in the chalk.

#lineinthechalk

The Working Party strongly recommends that F&BPC objects to the Planning Application NY/2025/0113/FUL