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cc: NYC Planning Committee Members

19 January 2026

Planning application - NY/2025/0030/ENV Land East of the Mill Yard, Burniston Mill, Coastal Road, Burniston. Construction of a temporary wellsite for the appraisal of gas, including drilling operation, proppant squeeze and flow testing operation and site restoration.

Europa Oil & Gas is aware that the application to drill a conventional gas appraisal well just outside the village of Burniston has attracted considerable public interest. More particularly campaign groups and activists are spreading misleading, false and defamatory material and information which has led to unnecessary alarm and concern among the public.

As we look to secure vital domestic energy supply, it is important we have a transparent and honest debate about how best to deliver this, without certain stakeholders trying to influence the conversation with misleading information.

In order to address the various topics that different groups have been publishing and thus ensure that the Planning Committee is aware of these issues we have laid out below statements that have been made and highlight how these are not correct or are misleading. I trust that this will help the Planning Committee when considering our application.

1. **“Friends of the Earth’s legal advice say that a Proppant Squeeze is ‘Fracking’ under the MWJP”**
2. **“No benefits to the local community”**
3. **“There is a seismic risk at Burniston and concerns with respect to coastal cliff stability”**
4. **“proposed NPPF reforms.... Removing ‘great weight’ would fundamentally change the planning balance for Europa’s application.”**

1. The drilling programme will involve a process called a proppant squeeze, an operation undertaken regularly and safely across a range of industries in the UK. NGO Friends of the Earth, who seek to prevent the company from gaining permission to drill the well, have sought legal advice to support their views. Whilst Friends of the Earth (FotE) campaign group's legal advice from Estelle Dehon KC, one of the UK's leading environmental barristers, does point out that local planning policy wording as defined in the Minerals and Waste Joint Plan (MWJP) would qualify the proppant squeeze as "fracking", she does not at any time in her advice suggest that low volume hydraulic fracturing is illegal or is covered by the ban on "fracking".

The MWJP definition of "fracking" is intentionally wider than the definition as recognised under national planning law and encompasses all forms of hydraulic fracturing. "Fracking" as understood nationally is related specifically to large volume hydraulic fracturing in pursuit of shale gas development. The MWJP recognises the ban on "fracking". The MJWP while extending the definition of "fracking" beyond current planning law recognises that low volume hydraulic fracturing is legal and that consideration should be given to such activity within the MWJP policy. It is therefore misleading to suggest that Estelle Dehon KC has in some form presented a legal argument based on the MWJP that the proppant squeeze is "fracking".

Despite the best efforts of campaign groups and activists against fossil fuel to conflate the definition of "fracking" as applying to all forms of hydraulic fracturing the government has not endorsed this view. The Energy Minister Michael Shanks has stated "the evidence base is not there at the moment, to suggest that low volume hydraulic fracturing activities have the same associated risks as fracking for shale gas". The current evidence base, both nationally and internationally, proves the proposed operation at Burniston is safe and environmentally sound. The UK onshore oil & gas industry is one of the most heavily regulated in the world. Despite repeated attempts by activists to discredit and undermine both the industry and its regulators, the industry has a good record for health, safety and the environment.

Europa in conjunction with the relevant authorities will ensure this proven safety and environmental record is not compromised by the proposed development.

2. As in other planning applications of this nature the understandable concerns of the local community have been aggravated by activists. It is informative to hear the voices of communities that have been through similar experiences. The residents of Broughton near Scunthorpe have been generous enough to record their experience of a similar operation in which their initial fears and concerns were identical to those of the communities around Burniston. The attached leaflet "Europa Testimonials" describes the reaction of residents and

their realisation that those concerns were misplaced. On the contrary the well site operation is seen as a “considerate and community focused neighbour”.

3. The risks associated with potential seismic activity fall outside of planning and are regulated by HSE, the Environment Agency, NSTA and DESNZ as part of a further development approval process. There is always micro-seismic activity associated with drilling a well of any nature (micro-seismicity is below the threshold of human awareness and is only visible through sensitive recording devices). The proposed well will be directionally deviated inland from the coast up to 2 km. Statutory consultees Natural England and the Environment Agency have expressed no concerns with respect to the proposed development and the coastal cliffs.

Based on current information earth tremors which might endanger livelihood, infrastructure or the environment (including water sources and the cliffs) as a result of the development are not considered a risk. Further detailed analysis with respect to potential for seismic activity will be published as part of a review of further 3D seismic which Europa has yet to acquire and interpret as part of the further development approval process outwith planning. If at any time there is a tangible risk of endangering livelihood, infrastructure or the environment the operation will not proceed.

4. There have been suggestions that proposed changes to the NPPF will change the planning balance of this development application and the Committee should therefore defer a decision until after the amendments are agreed.

Both the publication of the new draft NPPF and the direction of travel proposed by the Government is a material consideration which should be given weight in the determination of any planning application where it is relevant. However, the details of the proposed changes may change when the consultation responses have been considered by Government. As a result, any decision-maker should not rely upon specific changes proposed in a draft document.

Taking into account the direction of travel of the new draft NPPF there is no justification for delaying a decision on the application. The planning balance for this application remains firmly in favour of granting planning permission because:

- Policy M5 specifically enables decision-makers to approve development which facilitates the appraisal of gas within existing licensed areas;
- Natural gas remains a mineral of national and local importance which is necessary to meet society’s needs; and
- Policy S5 requires decisions to be in favour of sustainable development, including all forms of mineral extraction.

There is not a single political party or rational authority in the UK which does not project a requirement for natural gas up to and beyond the current net zero target in 2050. As to whether this comes from domestic supply or overseas import has not only

important implications for the UK's security and economic stability but also our overall contribution to Global Emissions.

We believe that despite the misleading, false and defamatory material propagated by campaigners, which stoke unnecessary concern, the public understands that in order to deliver a secure, ordered and commercially sustainable transition from fossil fuels the UK is still required to access the country's own hydrocarbon resources wherever viable within the planning and environmental legislation.

We hope you carefully consider the advice with respect to this planning application and support its approval.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'William Holland', is positioned above a faint, rectangular grey stamp.

William Holland
CEO
Europa Oil & Gas Limited

Encl: Europa Testimonials leaflet (1)