

Dear Sir or Madam

In short, I want to let you know that a serious problem is looming for the Planning Committee meeting on Friday 30th January. If you are attending, you may wish to raise this matter. The recent NY20250030ENV\_Burniston Wellsite\_Committee Report\_Final, prepared by the Planning Department has a suite of omissions that may subsequently form the basis of embarrassment (if not legal action) by one or more parties (including Europa) if not addressed at this stage.

- The 'Final' report appears well-written and clear, being based upon information presented in the initial application by Europa along with their response to a series of questions, detailed independent reports concerning environmental matters and comments from a range of consultees. The application and subsequent discussion thereof utilise the format and implied information requirements of the North Yorkshire Council (NYC) NYPA15 application form. However, NYPA15 is explicit in limitation to "MINERALS AND WASTE APPLICATION" (effectively 'near-surface' activity). It does not cover all the requirements of "APPLICATIONS FOR DEVELOPMENT RELATING TO THE ONSHORE EXTRACTION OF OIL AND GAS" (effectively 'deep drilling'), separately addressed by form NYPA17.

- I would hope that you are familiar with both of these forms, but in case you do not have them to hand, I have attached copies which I downloaded from NYC at the time of the NY20250030ENV application being submitted. The planning applicants would have had similar access to these forms, should they have wished to use them.

- NYPA17 has explicit and clear requirement for more detailed geological information – which Europa have not submitted in any form in their application, and indeed cannot possess (prior to their proposed 3D seismic survey). I am qualified to make this comment as a retired geologist with experience teaching aspects of hydrocarbon geology to post-graduate students, and who is familiar with the limited geological information currently available for the geographical area of the application.

- The 'Final' report shows that there have not yet been any replies to NYC from the North Sea Transition Authority (NSTA) or Department for Energy Security and Net Zero (DESNZ) - see screenshot 1, both of these bodies are listed in national and local guidance as organisations whose advice should be considered at the stage of MPA approval (see second and third attached screenshots). Together with the lack of geological information in the application, and given the clear guidance stated in the approved and published local Joint Mineral Plan, this means that the application as currently submitted should not be considered for approval, without resubmission in the correct format (NYPA17) and with all the information that requires. As NSTA have very recently given a 2 year extension to the current licensing conditions (which would otherwise have expired in March 2026), the applicant has ample time to make a new, revised application.

- It is not clear whether the choice to use NYPA15 format and thereby not include the information required by NYPA17 was made independently by the applicants, or on the basis of advice from the Planning Department. If the former, this would appear to be an attempt to evade the necessary process, if the latter it might be considered incompetence from NYC. In either case, this would merit further investigation.

- I raised my concerns about the improper use of NYPA15 in my representation of 16th April 2025 (still visible on the Planning Portal), but received no response, and can now see that this matter has not been resolved.

I hope that the above information is useful, and I have copied this e-mail to other parties who I believe may be interested.

Your Faithfully