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Branch Chair Mrs Jan Arger

Authority: North Yorkshire Council

Type of consultation: Minerals Planning Application

Full details of application/consultation: NY/2025/0113/FUL - Construction of a temporary wellsite for the exploration of gas, including drilling operation, well testing, retention of equipment and site restoration

At land at: Land north of Butt Lane, Foxholes, Driffield, YO25 3HY

Type of response: Strong Objection

Date of Submission: 2nd July 2026

All responses or queries relating to this submission should be directed to the Secretary for the Trustees at the contact details shown above on this frontispiece.

All CPRE North and East Yorkshire comments are prepared by the charity using professional planners whose research and recommendations form the basis of this response in line with national CPRE policies.

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Comment

CPRE North and East Yorkshire ('CPRENEY') welcomes the opportunity to provide North Yorkshire Council ('The Council') in their role as Mineral Planning Authority ('the MPA') with comments in response to a full application for the construction of a temporary wellsite for the exploration of gas, including drilling operation, well testing, retention of equipment and site restoration, at land north of Butt Lane, Foxholes, Driffild, YO25 3HY. The application was submitted by Egdon Resources U.K. Limited ('the Applicant').

Having considered the information submitted by the applicant throughout the course of this application, CPRENEY **strongly objects** to the above planning application and respectfully requests that the Council refuse planning permission. The proposal would introduce an intrusive industrial hydrocarbon exploration operation into a rural landscape, with associated drilling, testing, heavy goods vehicle movements, lighting, noise, emissions, water protection risks and long-term landscape and climate implications. In CPRENEY's view, the application is contrary to both national and local planning policies, inconsistent with the protection of rural character and amenity, and fails to demonstrate that the development can be made acceptable in this sensitive location.

The application should be refused for the following principal reasons:

- the proposal would cause unacceptable harm to the character, tranquillity and appearance of the rural countryside;
- it would undermine the protection of the Yorkshire Wolds landscape and its setting;
- it would generate avoidable heavy traffic on rural roads;
- it presents unresolved risks to water resources and the chalk aquifer;
- it would introduce noise, lighting, dust, odour and industrial activity harmful to residential and rural amenity; it is inconsistent with climate change objectives and the transition away from fossil fuels; and
- the application material does not provide sufficient certainty that all environmental, cumulative and restoration impacts can be adequately controlled.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application should be determined in accordance with the development plan unless material planning considerations indicate otherwise. The National Planning Policy Framework ('NPPF') was updated in December 2024 and sets out the government's planning policies for England and how these are expected to be applied. The NPPF is, therefore, a material consideration which should be taken into account when plan-making and determining applications.

The planning system should contribute to achieving sustainable development. The aims to deliver sustainable development through the implementation of its policies. Paragraph 11 states that for decision making this means:

- c) *'approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.'*

Currently, the relevant Development Plan in force for the Council consists of the North Yorkshire, York and the North York Moors National Park Authorities, Minerals and Waste Joint Plan ('MWJP') and the Ryedale Local Plan Strategy ('LGS').

The proposed 1.3Ha site currently comprises arable farmland to the north of Butt Lane, Foxholes and is accessed directly from Butts Lane, 850m east of the junction with the B1249. The site lies to the east of the village of Foxholes and is adjacent to the Village Hall and gardens. The site falls within the Foxholes and Butterwick Parish Council administrative area and is within the North Yorkshire boundary. The boundary with the East Riding of Yorkshire lies circa 350m to the east of the proposed site. The nearest watercourse to the site is the Gypsy Race, located opposite the site's entrance to the south side of Butts Lane. The site slopes from north to south with the Gypsy Race chalk stream running the length of the 'Great Wolds Valley'.

Rural Landscape, Character and Visual Harm

The proposed development is not a benign or low-impact rural use. It would introduce a temporary but substantial industrial wellsite into open countryside, including engineered surfacing, access works, security and welfare infrastructure, plant, lighting, drilling equipment, well testing infrastructure and associated vehicle movements. Even where described as temporary, such operations can have significant effects over the full life of the permission, particularly during construction, drilling and testing phases.

The countryside around the village of Foxholes forms part of a valued rural landscape characterised by openness, agricultural land, quiet lanes, settlement separation and long views. CPRENEY considers that the siting of a gas exploration wellsite in this location would erode the rural character and tranquillity of the area and would be at odds with the public interest in protecting the countryside for its landscape, amenity, ecological and cultural value.

This landscape objection is reinforced by the MWJP policies which require mineral development to be located and designed so that unacceptable adverse effects on landscape character, visual amenity, tranquillity and local distinctiveness are avoided. The proposal conflicts with those requirements because the wellsite would introduce industrial form, lighting, security infrastructure and drilling activity into a rural setting whose value lies in openness, agricultural character and relative quiet.

Impact on the Yorkshire Wolds and Countryside Setting

The application site lies within the wider setting of the Yorkshire Wolds, an area widely recognised for its distinctive chalk landscapes, open rolling farmland, dry valleys, historic villages and relative tranquillity.

CPRENEY is particularly concerned that approving hydrocarbon exploration in this landscape would set an undesirable precedent for further industrialisation of the Wolds and their rural setting.

The Council should attach substantial weight to landscape protection, rural amenity and the conservation of countryside character. The fact that the proposal is expressed as exploratory does not remove the need to assess its full physical and perceptual impact. Nor should the Council ignore the realistic consequence that a successful exploration phase may lead to pressure for further applications, longer-term retention, production infrastructure or further hydrocarbon activity in the locality – for a minimum of 28 years.

CPRENEY further understands that the proposal falls within the landscape setting of the proposed Yorkshire Wolds National Landscape. That proximity is a material planning consideration of substantial importance. The Yorkshire Wolds are the subject of a formal proposed designation process as an Area of Outstanding Natural Beauty, National Landscape. Natural England has published proposals for the Yorkshire Wolds designation, following statutory and public consultation, and the Council should treat the emerging designation and its

evidence base as highly relevant to the assessment of landscape sensitivity, setting and cumulative harm.

The NPPF 2024 is clear that National Landscapes, like National Parks and the Broads, have the highest status of protection in relation to landscape and scenic beauty. Great weight must be given to conserving and enhancing landscape and scenic beauty in such areas, and the conservation and enhancement of wildlife and cultural heritage are also important considerations. Although the Yorkshire Wolds designation may still be progressing through its formal process, the Council should not ignore the national significance of the landscape evidence or permit development within its immediate sensitivity zone that would prejudice, undermine or conflict with the purposes of designation.

This point is also directly relevant to the MWJP, which recognises that North Yorkshire contains nationally important protected landscapes and requires mineral development to avoid unacceptable adverse effects on landscape character, visual amenity, tranquillity and the setting of designated landscapes. In CPRENEY's submission, a gas exploration wellsite within the landscape setting of the proposed Yorkshire Wolds National Landscape is fundamentally inconsistent with that policy approach. The proposal would introduce an industrial mineral operation into a location where the Council should be applying heightened caution, giving great weight to landscape protection, and avoiding development that would compromise the special qualities and setting of the Wolds.

The Levelling Up and Regeneration Act (LURA) 2023, places a strengthened statutory duty on competent authorities to ensure that any proposals affecting nationally designated landscapes (including National Parks and National Landscapes - formerly Area's of Outstanding Natural Beauty) '*seek to further the purposes*' of the designation, relating to the purpose to '*conserve and enhance the natural beauty*' of the area. This means that the MPA must give substantial weight to the protection of the proposed Yorkshire Wolds National Landscape by carefully considering proposed developments within its important setting – where the NPPF, para. 189, sets out that '*development within their setting should be sensitively located to avoid or minimise adverse impacts on the designated areas.*' Whilst not formally designated, the proposal is at the later stages of the process and such substantial weight can be attributed to its protection.

Policy M16 was long debated at the Examination of the MWJP and sets out clearly at point Di) '*where proposals for surface hydrocarbon development meet other locational criteria set out in this policy but fall within a National Park or an AONB or the associated 3.5km visual sensitivity zone around these areas, as identified on the Policies Map, or where located beyond this zone, are otherwise considered to have the potential to cause significant harm to a National Park and/or AONB, applications should be supported by a detailed assessment of the potential impacts on the designated area, unless it can be demonstrated that such an assessment is not required, taking into account the particular locational circumstances of the proposed site relative to the designated area. Where detailed assessment is required, this should include an assessment of views of and from the designated areas from significant viewpoints and an assessment of the cumulative impact of development in the area. 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 in accordance with Policy D04.*' CPRENEY argues that the proposed elevated site would have the potential to significantly harm the protected landscape from within its setting.

Traffic, Access and Highway Impacts

The proposal would require a significant number of heavy goods vehicle and operational vehicle movements during construction, drilling, testing and restoration. Rural roads in and around Foxholes are not designed to accommodate sustained industrial traffic without harm to local amenity, road safety, verges, agricultural access and the quiet enjoyment of the countryside. Increased HGV traffic would also add noise, vibration, emissions and perceived danger for residents, walkers, cyclists, horse riders and other road users.

CPRENEY does not consider that the rural road network should be used to support fossil fuel exploration

where the claimed public benefit is speculative and limited. The Council should require rigorous scrutiny of the transport assessment, routing, cumulative traffic impacts, abnormal loads, timing of movements, verge damage, road repairs, pedestrian safety and the implications for neighbouring communities beyond the immediate site boundary.

The MWJP transport and local amenity policies require safe and suitable access and avoidance of unacceptable impacts from traffic, including HGV movements. CPRENEY considers that the proposal does not satisfy those requirements because the traffic is not incidental rural traffic, but industrial traffic generated by fossil fuel exploration. The Council should treat traffic impacts as part of the overall planning harm, not as a matter capable of being separated from landscape, noise, emissions and community amenity.

The proposed route must also be assessed in the context of the actual physical and operational character of the surrounding highway network. The roads serving Foxholes and the wider Wolds are rural roads, often narrow, winding, constrained by verges, hedgerows, gradients, limited forward visibility, agricultural traffic, walkers, cyclists, equestrians and local access movements. They are not designed to function as an industrial haulage route for sustained wellsite construction, drilling, servicing, waste removal, testing and restoration traffic. The Council should therefore scrutinise not only whether vehicles can theoretically pass along the route, but whether the route is suitable, safe and appropriate in real-world rural conditions.

Particular concern arises in relation to Staxton Hill and the B1249 corridor. Staxton Hill is a known constraint on the local network and is subject to closures for planned maintenance, resurfacing, drainage works, accidents, incidents and other disruption. Recent public notices and local reports show that closures of Staxton Hill and sections of the B1249 require signed diversions using substantially longer routes, including routes via Bridlington and other surrounding roads. This demonstrates that the route is vulnerable and lacks resilience. If Staxton Hill is closed during any phase of the proposed development, the application does not appear to explain with sufficient certainty where HGVs, drilling-related vehicles, abnormal loads, tankers or service traffic would be rerouted. That omission is material. Rerouting wellsite traffic away from Staxton Hill is not a neutral matter, because the surrounding network is itself rural, constrained and sensitive. Alternative roads may pass through small villages for example, Burton Flemming and Grindale or Weaverthorpe consisting of minor narrow lanes, agricultural access points, recreational routes and quiet countryside. They may be unsuitable for frequent HGV movements, particularly where they involve narrow carriageways, bends, gradients, limited passing opportunities or conflict with non-motorised users. The Council should not accept a traffic management plan which assumes the availability of alternative routes without identifying, assessing and consulting on those routes in detail.

CPRENEY is particularly concerned that the applicant has not provided sufficient detail of any alternative route or emergency route in the event that Staxton Hill is closed or unavailable as a route to or from the A64. No clear diversion strategy appears to have been submitted, and no assessment has been provided of the safety, suitability, capacity, gradients, widths, junction constraints, vulnerable road-user impacts or community effects of any emergency route. This is a serious omission because closures of Staxton Hill are a foreseeable scenario, not a remote contingency. Without a fully assessed and consulted-upon emergency routing plan, the Council cannot lawfully or rationally conclude that safe and suitable access has been demonstrated for all phases of the development.

The impacts on vulnerable road users require particular weight. The local highway network is used by walkers, cyclists, horse riders, residents, agricultural workers, visitors and slower-moving vehicles. Many of these users have limited protection and may be forced into conflict with HGVs where roads are narrow, lack pavements, have soft verges, limited forward visibility or no safe refuge. Hydrocarbon traffic would not simply add numerical vehicle movements; it would introduce larger, heavier and less manoeuvrable vehicles into an environment where the margin for error is already limited.

The assessment should also recognise the economic and social function of the local road network. The area is dependent on agriculture and tourism, both of which rely on rural roads that already carry farm machinery, delivery vehicles, local traffic, visitors to the Wolds, cyclists, walkers and equestrian users. Farm traffic is seasonal and can involve large, slow-moving machinery, trailers and livestock movements. Tourist traffic can be concentrated at weekends, holiday periods and during good weather. The addition of wellsite HGVs, tankers, abnormal loads and service vehicles would increase conflict, delay, intimidation and risk at precisely the locations where rural road capacity and resilience are weakest.

CPRENEY is further concerned about existing congestion and sensitivity around Octon, including traffic associated with East Riding Crematorium at Octon Roundabout. The crematorium is an established regional facility with on-site services, memorial visits, hospitality use and funeral-related vehicle movements, including corteges and visitors who may be unfamiliar with the local roads. Funeral traffic is time-sensitive and can involve groups of vehicles travelling together. Any routing or diversion of industrial wellsite traffic through or near Octon risks creating delay, conflict and distress, particularly where congestion already occurs around service times or during events. The transport assessment should not treat this as an ordinary rural junction issue; it is a sensitive community and visitor environment requiring specific assessment.

The NPPF 2024 requires that safe and suitable access to the site can be achieved for all users. It also provides that development should only be prevented or refused on highway grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. CPRENEY submits that this test is engaged here. The proposal risks unacceptable highway safety impacts for vulnerable road users and severe residual cumulative impacts in terms of congestion, route resilience and conflict with existing agricultural, tourist and crematorium traffic, especially if Staxton Hill or other parts of the proposed route are closed or restricted.

Mitigation has not been shown to overcome these concerns. A routing agreement, driver instruction or traffic management plan cannot make an unsuitable rural network suitable unless it identifies and assesses all realistic routes, all reasonable future scenarios, peak agricultural periods, tourist peaks, crematorium service times, emergency diversions, abnormal load movements, verge damage, passing-place requirements and interaction with non-motorised users. The residual impacts should therefore be treated as severe, or at the very least inadequately assessed, and permission should be refused until the applicant has demonstrated safe and suitable access for all users and the absence of unacceptable or severe cumulative transport effects.

The NPPF and MWJP require mineral proposals to demonstrate that access arrangements are safe and suitable and that unacceptable transport impacts will be avoided. CPRENEY submits that this test is not met where the proposed access strategy depends on a vulnerable rural route, including Staxton Hill, without a robust contingency for closures and without demonstrating that any diversionary route would be acceptable for industrial hydrocarbon traffic. The Council should require a full assessment of route resilience, abnormal load movements, HGV swept paths, verge damage, passing places, accident history, seasonal agricultural traffic, school and commuter periods, recreational users and emergency access. In the absence of that assessment, the proposal conflicts with the Joint Plan transport and amenity policies and should be refused.

Noise, Lighting, Dust, Odour and Residential Amenity

Hydrocarbon exploration is materially different from ordinary agricultural activity. The proposal would involve drilling operations, testing, generators, pumps, vehicle movements, site security, lighting and potentially round-the-clock or extended-hour activity. These impacts would be experienced in a quiet rural setting where changes in background noise, lighting and industrial activity are likely to be especially noticeable.

CPRENEY is concerned that mitigation by condition would not adequately protect residents and the rural

environment from intrusive noise, night-time lighting, dust during construction and restoration, odour or emissions during testing, and disturbance arising from traffic and operational activity. Where monitoring evidence is uncertain or where assumptions are based on limited survey periods, the Council should apply a precautionary approach and refuse permission unless satisfied beyond reasonable doubt that unacceptable impacts would not arise.

The Minerals Planning Practice Guidance is directly relevant to the drilling phase. It requires mineral planning authorities to consider the prevailing acoustic environment, whether the proposed operations would give rise to adverse or significant adverse effects, and whether a good standard of amenity would be achieved. For mineral workings, noise limits should normally not exceed the background noise level by more than 10 dB(A), subject to an upper limit, and night-time limits require particular caution because sleep disturbance and rural tranquillity are especially sensitive receptors.

CPRENEy specifically objects to any approach which treats 42 dB LAeq at night as a mere threshold, target or starting point for negotiation. In the context of minerals guidance, 42 dB LAeq for night-time noise is properly understood as an absolute upper cap for normal night-time mineral operations, not as a level that may routinely be exceeded or balanced away. Where predicted night-time drilling noise approaches, reaches or exceeds 42 dB LAeq at noise-sensitive receptors, the proposal should be treated as non-compliant unless the applicant can demonstrate with robust, worst-case, site-specific evidence that no adverse effect on sleep, amenity or rural tranquillity would occur. CPRENEy does not consider that such a demonstration has been made.

The rural context is crucial. A level which might be less noticeable in an urban or industrial setting can be materially intrusive in a quiet countryside location. Continuous or semi-continuous drilling plant, tonal components, low-frequency noise, impulsive sounds, reversing alarms, generators, pumps and vehicle activity may all increase the character and perceived impact of noise. The Council should therefore require conservative assumptions, independent scrutiny and refusal where the night-time cap cannot be met with certainty.

The applicant's own noise assessment records very low baseline night-time noise levels in this rural location. That evidence is critical. A quiet countryside baseline means that even apparently modest absolute noise levels can represent a very substantial increase above the existing acoustic environment. In those circumstances, a proposed night-time condition allowing noise up to 40 dB LAeq is far too loud and would not preserve rural tranquillity or residential amenity. A 40 dB LAeq night-time limit may be below the 42 dB LAeq mineral guidance cap, but that does not make it acceptable. The cap is not a licence to operate near it; it is an outer ceiling. The correct planning question is whether the development reduces potential adverse noise impacts to a minimum in the specific local context.

The World Health Organization has repeatedly identified night-time noise as a cause of sleep disturbance and adverse health effects. WHO guidance recommends that indoor bedroom noise at night should be kept to low levels to protect sleep quality, and that outdoor night noise should be controlled to prevent adverse health effects. The WHO also identifies noise as an environmental nuisance capable of causing annoyance, sleep disturbance and wider health impacts. In a location where the measured night-time background is low, permitting continuous or semi-continuous drilling noise at 40 dB LAeq would risk exactly the kind of night-time disturbance that WHO guidance seeks to prevent.

The Noise Policy Statement for England is also directly relevant. Its long-term vision is to promote good health and a good quality of life through the effective management of noise. It requires decision-makers to avoid significant adverse impacts, mitigate and minimise adverse impacts, and, where possible, contribute to improvements in health and quality of life. A condition set at 40 dB LAeq at night in a quiet rural setting does

not reflect that hierarchy. It would manage noise only by setting a permissive operational ceiling, rather than requiring the applicant to demonstrate that noise has genuinely been minimised.

The NPPF 2024 requires planning decisions to ensure that new development is appropriate for its location, taking into account the likely effects of pollution on health, living conditions and the natural environment, and the sensitivity of the site and wider area. It specifically requires decision-makers *‘to mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development, and to avoid noise giving rise to significant adverse impacts on health and quality of life’*. That obligation is especially important here because the affected environment is not already noisy or industrial; it is a quiet rural landscape where night-time tranquillity is part of the area’s character and amenity value.

This aligns with the Minerals Planning Practice Guidance, which places an onerous evidential burden on mineral operators where they contend that further noise reduction is not achievable. The guidance does not allow an operator simply to propose a limit close to the upper cap and rely on a condition. The applicant must demonstrate, with clear technical evidence, that all reasonable and practicable steps have been taken to reduce noise to a minimum, including alternative siting, plant selection, acoustic enclosure, temporary screening, layout, operational methods, working hours, tonal and low-frequency control, reversing alarm strategy, maintenance, monitoring and contingency measures. CPRENEY submits that no adequate evidence has been provided to discharge that burden.

Accordingly, the proposed 40 dB LAeq night-time condition should not be treated as a robust safeguard. It would still permit intrusive night-time industrial noise well above the low existing background, with potential for sleep disturbance, annoyance and loss of tranquillity. The Council should require the applicant to show why materially lower night-time limits cannot be achieved and why the operation cannot be designed, located or timed to avoid night-time drilling noise impacts altogether. In the absence of that evidence, the proposal fails the NPPF 2024, the Noise Policy Statement for England, the Minerals Planning Practice Guidance and the MWJP policies on local amenity and environmental protection.

Water Environment and Chalk Aquifer Protection

The protection of water resources must be a central consideration. The proposed drilling operation would take place in an area associated with chalk geology and groundwater sensitivity. CPRENEY considers that any risk to aquifers, groundwater quality, private water supplies, public water resources, surface water drainage or pollution pathways must be treated with the utmost seriousness. The rural community should not be asked to accept avoidable risk to water resources for speculative fossil fuel exploration.

The Council should not defer fundamental questions of water protection to later permitting regimes where those matters are also relevant to land use planning. Planning permission should only be granted if the Council is satisfied that the development is acceptable in planning terms, including its location, scale, design, construction method, cumulative risk profile and restoration certainty. CPRENEY submits that the application has not demonstrated that standard mitigation, monitoring and regulatory controls are sufficient to overcome the planning objection in this sensitive rural and hydrogeological context.

The MWJP policies on the water environment require protection of groundwater, surface water, water supplies and pollution pathways. For a drilling proposal in chalk geology, this is not a peripheral concern but a core planning issue. CPRENEY objects because the application has not demonstrated that the hydrogeological risk is acceptable when assessed against the precautionary approach required for mineral development affecting sensitive water resources.

The site is located within Zone 3 of a Source Protection Zone. The SPZ3 is associated with a number of abstractions stretching from Bridlington to Driffield, with the Flamborough Chalk Formation directly beneath

the site underlain by various other chalk formations. The chalk is the uppermost aquifer which supports nearby abstractions and supports much of the rural hinterland surrounding the site and beyond.

The unsuitability of the proposal is heightened by its relationship with the Gypsey Race, a chalk stream associated with the Yorkshire Wolds chalk system. Chalk streams are internationally rare habitats, and the Gypsey Race is widely recognised as one of the most northerly chalk streams in Britain, flowing through the Wolds and connected with springs, groundwater movement and the chalk aquifer. The proposal is therefore not merely adjacent to an ordinary watercourse; it is located within a sensitive chalk landscape where surface water, groundwater, dry valleys, springs and ecological receptors are interconnected which is also a Local Wildlife Site.

This matters in planning terms because chalk aquifers are not simply geological features: they are strategic water resources supporting drinking water supply, agricultural resilience, baseflow to chalk streams, wetland habitats, biodiversity and climate adaptation. The Yorkshire Wolds chalk aquifer is vulnerable because groundwater can move through fractures, fissures and preferential pathways, meaning that contaminants may travel unpredictably and rapidly. For a hydrocarbon exploration proposal involving drilling, well integrity risks, storage of substances, waste handling, surface water management and site restoration, CPRENEY submits that the Council must apply a precautionary approach and require clear, independent evidence that serious or irreversible harm can be ruled out.

The MWJP requires protection of water resources, groundwater quality, surface water, ecological receptors and local amenity when determining mineral and hydrocarbon proposals. Those requirements are particularly stringent in a chalk aquifer setting because the consequences of pollution may not be localised, immediate or easily reversible. CPRENEY considers that the application conflicts with that policy framework because it has not demonstrated that drilling and testing for gas can be undertaken without unacceptable risk to the Gypsey Race, the wider chalk aquifer and the dependent ecological and water-supply functions of the Wolds.

The Council should also take into account the wider policy and public-authority recognition of chalk streams in East Yorkshire. East Riding of Yorkshire Council has publicly supported stronger protection for the region's rare chalk streams, including recognition of their international significance and calls for chalk streams to be treated as irreplaceable habitats within planning policy. That stance is directly relevant to this application because the Gypsey Race and the Yorkshire Wolds chalk system do not respect administrative boundaries. A decision by North Yorkshire Council to permit hydrocarbon drilling in this sensitive chalk landscape would be difficult to reconcile with the regional objective of protecting and restoring chalk streams from pollution, abstraction pressure, nutrient loading and climate stress.

The Environment Agency and local catchment partnerships have also identified Yorkshire's chalk rivers and chalk aquifers as globally rare, internationally significant habitats which should be enhanced and protected for future generations. Restoration projects on the Gypsey Race are intended to reduce pollution, improve habitat and support ecological recovery. It would be perverse for the planning system to support restoration of the Gypsey Race while simultaneously permitting a new fossil fuel drilling operation in its hydrological setting without compelling need and without eliminating the risk of harm to the chalk aquifer and chalk stream system.

Climate Change and Fossil Fuel Dependence

CPRENEY objects in principle to new hydrocarbon exploration because it would prolong dependence on fossil fuels at the very point when national policy, scientific evidence and public interest require accelerated transition to renewable and low-carbon energy. The planning case for this proposal is therefore fundamentally weak: the development is not needed to meet a compelling local or national requirement for new gas extraction, and its real purpose is to identify and enable further fossil fuel production if commercially

viable. Exploration cannot be separated from extraction in planning judgment, because the exploration stage is only pursued to open the possibility of future production.

The UK's energy needs should increasingly be met through demand reduction, energy efficiency, storage, grid reinforcement and renewable generation, not through opening new sources of fossil gas. Any asserted contribution to energy security would be speculative, delayed, temporary and small in comparison with the urgent need to reduce greenhouse gas emissions. The Council should give limited weight to claimed benefits of exploration and substantial weight to the climate consequences of facilitating a new fossil fuel project in a rural location.

The NPPF must be read as a whole. Although the minerals chapter recognises that minerals are of importance, and can only be extracted where found, the Framework also requires planning to support sustainable development, protect health and amenity, conserve and enhance the natural environment, and meet the challenge of climate change. The 2024 Framework gives particular prominence to the transition to a net-zero future and to ensuring that planning decisions take full account of climate impacts. A decision to permit new gas exploration should not be treated as neutral simply because it is exploratory; it is a step in a fossil fuel development chain and should be assessed accordingly.

The NPPF requires decision-makers to distinguish between development that genuinely contributes to sustainable economic, social and environmental objectives and development whose adverse impacts outweigh any benefits. The claimed economic benefits here are limited and temporary, while the proposal would enable a form of energy development that is inconsistent with the direction of national climate policy and the urgent need to decarbonise. On that basis, the development is not sustainable development and should be refused.

Biodiversity, Agricultural Land and Restoration

The development would disturb agricultural land and has the potential to affect habitats, field boundaries, soils, drainage patterns and local biodiversity. CPRENEY is concerned that temporary mineral and hydrocarbon development can leave lasting effects through soil compaction, altered drainage, contamination risk, habitat disruption, access works and residual infrastructure. Restoration promises must be robust, enforceable, fully funded and capable of returning the land to its former condition within a clear timescale.

The Council should not attach decisive weight to restoration proposals unless it is satisfied that restoration is technically achievable, secured by appropriate financial guarantees, protected against operator failure, and capable of delivering biodiversity and landscape recovery without delay. If successful testing leads to pressure for retention or production, restoration could be deferred or diluted. That risk should be considered now.

Planning Policy and Decision-Making Balance

The adopted MWJP forms part of the statutory development plan for this application and must be applied together with the NPPF, the Minerals Planning Practice Guidance, the Noise Policy Statement for England and other relevant material considerations. CPRENEY recognises that the development plan contains policies for conventional hydrocarbon development, but those policies are conditional and protective. They do not establish a presumption in favour of gas exploration. Rather, they require the applicant to demonstrate that the development is environmentally acceptable, properly justified, capable of being operated without unacceptable harm, and consistent with the protection of landscape, amenity, water resources, transport safety, biodiversity, restoration and climate objectives.

When the application is assessed against that policy framework, the balance weighs firmly against approval. The proposal would facilitate a new fossil fuel exploration project at a time when the planning system should support transition to renewable and low-carbon energy. No compelling need has been demonstrated for new

gas extraction in this location or for the wider UK energy system. Any asserted energy-security or economic benefit is speculative, delayed, temporary and contingent on later production, whereas the climate harm of opening a pathway to further fossil fuel development is a present and material planning consideration. The landscape harm also carries substantial weight. The site lies within the Yorkshire Wolds and within the setting of the proposed Yorkshire Wolds National Landscape. National Landscapes are afforded the highest level of protection in planning policy terms in relation to landscape and scenic beauty, comparable with National Parks and the Broads. The Joint Plan's landscape and hydrocarbon policies must therefore be applied with heightened caution. An industrial wellsite, drilling operations, lighting, traffic and associated infrastructure would be incompatible with the rural character, tranquillity and special qualities that the emerging designation seeks to protect.

The transport impacts further weigh strongly against permission. The applicant has not demonstrated safe and suitable access for all users, nor has it assessed the severe residual cumulative effects that may arise on the rural road network. The proposed routing depends on constrained rural roads, including Staxton Hill and the B1249 corridor, without adequate evidence of route resilience or a properly assessed emergency route if Staxton Hill is closed to or from the A64. The surrounding network is used by vulnerable road users, farm traffic, tourist traffic and crematorium-related traffic around Octon. In the absence of detailed assessment of alternative routes, congestion, highway safety, abnormal loads and non-motorised users, the NPPF 2024 transport tests and the Joint Plan transport policies are not satisfied.

Noise and residential amenity impacts also carry significant adverse weight. The application records very low night-time baseline noise levels, yet the proposed night-time limit of 40 dB LAeq would permit a substantial and intrusive increase in noise in a quiet rural environment. The Minerals Planning Practice Guidance requires operators to minimise noise and treats 42 dB LAeq as an upper cap, not a target. The NPPF requires adverse noise impacts to be reduced to a minimum, and the Noise Policy Statement for England and WHO guidance identify sleep disturbance and nuisance as important health and quality-of-life concerns. The applicant has not discharged the onerous burden of showing that further noise reduction is not practicable.

Water environment impacts add further decisive weight against approval. The proposal is located in a sensitive chalk landscape associated with the Yorkshire Wolds chalk aquifer and the Gypsy Race chalk stream. Chalk streams are internationally rare habitats, and chalk aquifers are strategic water resources supporting drinking water, ecology, agriculture and climate resilience. The Joint Plan requires protection of groundwater, surface water, water supplies and ecological receptors. The application has not demonstrated that drilling, testing, storage, waste handling, well integrity and restoration can be undertaken without unacceptable risk to the chalk aquifer, the Gypsy Race or dependent habitats.

Standing back, the planning balance is not close. The claimed benefits are limited, temporary and speculative: short-term construction activity, possible exploratory knowledge and a contingent contribution to future gas production. Against that, the adverse impacts are substantial, multi-layered and insufficiently mitigated: climate conflict and lack of need for new gas; harm to the Yorkshire Wolds and proposed National Landscape sensitivity zone; unacceptable noise risk in a quiet rural area; unresolved highway safety, congestion and emergency-routing issues; risk to the Gypsy Race and chalk aquifer; disturbance to residents, vulnerable road users, agriculture and tourism; and uncertainty over restoration and future production pressure. These harms are not isolated technical concerns but mutually reinforcing reasons why the proposal is inappropriate in this location. CPRENEY therefore submits that the development plan, the NPPF and relevant national guidance all point to refusal.

Conclusion and Requested Decision

For the reasons set out above, CPRENEY respectfully objects to planning application NY/2025/0113/FUL and requests that Council refuse planning permission.

The proposal is inappropriate in this rural location, would cause unacceptable harm to countryside character and amenity, raises unresolved environmental and water protection concerns, would generate significant traffic and operational disturbance, and is inconsistent with the direction of travel required by climate change policy and responsible rural planning.

CPRENEY reserve the right to comment further should additional information be consulted upon in support of the development in this location.