

Rathlin Energy Ltd 21.02464.STFUL - APA360983476

Planning Reference

Application Reference:	21/02464/STFUL
Address:	Rathlin Energy Ltd West Newton Exploration Well Site Fosham Road High Fosham East Riding of Yorkshire
Proposal:	To construct an extension to the existing West Newton A (WNA) wellsite, test, appraise and produce from the two existing wells and drill, test, appraise and produce from up to six (6) new wells followed by decommissioning and wellsite restoration.

User information

Your name:	Dennis Gosling
Your address:	231 Ganstead Lane, Ganstead, HU11 4BG

Comments

Commenter type:	Member of the Public
Stance:	Object
	<p>OBJECTION: - Application reference 21/02464/STFUL</p> <p>I strongly object to the above reference being granted to Rathlin Energy Ltd based on the following itemised reasons.</p>

Transportation:-

1. As per the Rathlin Energy Transport Assessment Document, sec'n 6.2 vehicle types:-

These vehicles will consist of two versions, Articulated HGV and AILV. (page 21 of 28).

The articulated HGV, 5 axle version weighs up to 3.5 tonnes empty and carries 38 tonnes loaded.

During the construction and appraisal phase 3 years, these HGV loads could run at maximum load.

2. Assuming worst case scenario:-

There will be 22 to 25 "trips"/ day ("trip" is 1 arrival + 1 departure = 50 journeys).

25 journeys = 9125 /year @ no load weight= 63,875 tonnes/year

25 journeys = 9125 /year @ full loaded weight = 346,750 tonnes/year

A total of 410,625 tonnes/year of HGV traffic.

During the first 3 years = 1,231,875 tonnes/year of excess wear & tear and damage on the inadequate "C" & "B" roads & verges from the well site to main roads access. Add the production phase of a further 20 yrs using HGV road tankers carrying 20 tonnes of crude oil each then the road maintenance extra costs would be massive and have to be met by the ERYC council tax funds.

3. Transportation costs and use of road tankers whether purchased, contract rental or wear & tear replacement plus mileage costs must be exorbitant over 20 to 25 yrs well-site operation.

A pipeline could go to the Saltend Chemical site and down the shipping jetty to load onto an oil tanker to ship over the Humber to the Humber Refinery. This could, if economically viable, remove all road transport, residential amenities & population disturbance, traffic and traffic pollution problems.

NOTE reference: -

Sec'n 8.2.3 Joint Minerals Local Plan of the West Newton 'A' planning document page 56 of 108, in Policy EM4: Oil and Gas Production and Distribution, para 4, states:

Following testing of all wells a decision will be made to the viability of a pipeline, which will be subject to a separate grant of planning permission. This comment still allows HGV vehicle and HGV Road Tanker movements for approx. 3 years before this pipeline viability exercise takes place, then if agreed, the time of

Your comments:

the construction phase of said pipeline.

Climate Control:-

1. The UK is a signatory of the Paris Climate Agreement. The proposed Rathlin Energy development plan is incompatible with this and would adversely impact the UK's ability to meet its obligations under the Treaty.

2. The UK Government declared a Climate Emergency in 2019, again proposed development is also incompatible. The East Riding Council (ERYC) also declared a Climate Emergency in February 2021. If the planning proposal is passed, this decision would counter the UK target for net zero carbon emissions by 2050.

3. The proposed development could result in 200,000 tonnes of CO2 equivalent greenhouse gas pollution, plus releasing greenhouse gas methane. Rathlin Energy want to incinerate natural gas exceeding 10 tonnes per day. Again, more climate pollution.

4. West Newton A Planning Statement

Page 21 of 108; states :-

Oil and gas as a type 2 Naturally Occurring Radioactive Material (NORM) industrial activity. This type 2 NORM activity whether as a solid or a liquid (Produced water etc), a Radioactive Substances Regulations activity permit (RSR permit) is required.

Produced water has a high potential for Low Specific Activity (LSA) radioactive scaling of equipment. This scale has to be safely removed and disposed to a permanently safe place.

The Government document "Strategy for the management of Naturally Occurring Radioactive Material (NORM) waste in the United Kingdom" states "there is only one landfill site in the UK that can take hazardous NORM waste, making this disposal route fragile".

Rathlin Energy in their planning statement play this down to a low key comment therefore all future LSA scale contaminated water should be monitored strictly.

Created date:

05/09/2021 11:07