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**EIA Screening Opinion - PA/SCR/2025/4**

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Date Mon 17/03/2025 10:12

To Planning <Planning@northlincs.gov.uk>

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**For the Attention of Mr Andrew Law**

**PA/SCR/2025/4 – Egdon Resources Oil & Gas development, Wressle**

Dear Sir

We write with regard to Egdon Resources' request for a screening opinion relating to plans for expansion of oil & gas development at Wressle.

You will be aware that the Supreme Court ruling in *Finch v Surrey County Council* found that GHG emissions which will inevitably result from burning extracted hydrocarbons must be considered as indirect effects of oil & gas developments, and should therefore be properly assessed and considered in decision-making.

The screening stage of an EIA determines whether or not a proposed development is an "EIA development" such that it requires an EIA to be carried out. Under the 2017 Regulations, an "EIA development" means development which is either Schedule 1 or Schedule 2 development "likely to have a significant effect on the environment" by virtue of certain factors, including climate change.

Clearly, Egdon's proposal falls within Schedule 2 but from their submission, it appears they are trying to circumvent EIA assessment by claiming in advance that the effects are "insignificant". They have arrived at this conclusion by applying a methodology which ignores the cumulative impact of development – a basic tenet of planning decision-making - and by framing Category 11 emissions as a percentage of national carbon budgets. (At the same time they appear to have excluded Category 11 emissions from the comparisons with local county carbon budgets - this differentiation is inconsistent and unhelpful in contextualising impact.) Numerous projects could be dismissed by framing in the way that Egdon have adopted but all emissions are relevant (therefore significant) in the context of climate. Furthermore, comparisons for new oil & gas development should logically be made against the space remaining within carbon budgets once existing and committed emissions have been taken into account, not the total carbon budget in the abstract. Egdon's reliance upon the 'small percentage/drop in the ocean' approach is one that has been rejected by international courts because climate change is caused by cumulative emissions from a myriad of individual sources, each proportionally small relative to the global total of GHG emissions.

By commissioning reports on emissions and promising to submit further reports, Egdon have acknowledged that this aspect of the development should be submitted to scrutiny.

However, it seems that whilst they are willing to provide information relating to emissions, Egdon are seeking to avoid scrutiny of said information through the EIA process, by pre-emptively claiming that the effects are “insignificant”. This is a decision that should only be made following an open debate, involving public participation which is not possible in the short timeframe allowed for Screening Opinion decisions. Public participation was highlighted by the Supreme Court in Finch as a vital element of the decision-making process relating to matters concerning climate.

We, therefore, urge the council to take a precautionary approach and screen positively for EIA as it would seem irrational to do otherwise.

Yours faithfully  
Amanda Suddaby on behalf of  
**Fossil Fuel Free Lincolnshire**