LINCOLN CLIMATE COMMISSION

To: The Planning Inspectorate

2 December 2025

From: Undersigned members of the Lincoln Climate Commission
APPEAL REFERENCE no: 3296831

Dear Sir / Madam

This letter serves as a formal objection from the undersigned members of the Lincoln Climate Commission to Egdon Resources' application for exploration and long-term extraction of oil at Biscathorpe. This will be the fourth formal objection from the Lincoln Climate Commission. It follows on from three previous objection letters submitted in April and August 2021, and February 2025 (attached as appendices). This letter focuses on the most recent evidence and information available and is submitted on the understanding that the content of the previous letters will also be considered.

We object to the application on the grounds that:

1. The latest evidence firmly states that climate change is a real threat to the whole world.
2. The consequences of greenhouse gases (GHGs) are well understood, and urgent action is needed to reduce emissions.
3. Downstream emissions must be included in environmental impact assessments (EIAs).
4. The UK government has been advised to act, and the UK's Secretary of State for Energy and Climate Change has committed the country to tackling the causes of emissions.
5. Drilling at the Biscathorpe site will threaten the health of a rare chalk-stream, which is itself set in a National Landscape
6. Egdon Resources have failed to provide consistent and accurate evidence to support its case to proceed with exploration and extraction.

Please see the latest evidence in greater detail to support this formal objection.

The planet is "hurtling toward climate chaos" with rising sea temperatures and levels, increasing extreme flooding events and climate disruptions

In the State of the Climate Report published 29 October 2025, world-leading climate scientists assert, "*We are hurtling toward climate chaos. The planet's vital signs are flashing red*." The authors evaluated 34 of the planet's vital signs and found 22 to be at record levels**.** They cite in detail multiple lines of clear evidence in support of their warning, summarised by "*almost every corner of the biosphere is reeling from intensifying heat, storms, floods, droughts, or fires. The window to prevent the worst outcomes is rapidly closing." "… in May 2025, the average carbon dioxide concentration at the Mauna Loa Observatory, in Hawaii, exceeded 430 parts per million—a level likely not seen in millions of years… So far, in 2025, global average surface temperature is at the second highest level on record and… The past 10 years, 2015–2024, are the 10 warmest years on record*." Referring to the World Meteorological Organization's report that 2024 was "*the hottest year on record*", they comment "*Rising levels of greenhouse gases remain the driving force behind this escalation. These recent developments emphasize the extreme insufficiency of global efforts to reduce greenhouse gas emissions and mark the beginning of a grim new chapter for life on Earth*."

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The consequences of greenhouse gases (GHGs) are well understood, and downstream emissions must be included in environmental impact assessments (EIAs)

The main source of greenhouse gases (GHGs) is the combustion of fossil fuels. Following the Supreme Court Finch ruling, downstream (=scope 3 category 11) emissions must be included in environmental impact assessments (EIAs). You must now take this into account in determining whether Egdon's planning application should be granted. The consequences of GHGs are well understood. On this, the 2025 State of the Climate Report cites the following key facts:

- "*The Greenland and West Antarctic ice sheets may be passing tipping points, potentially committing the planet to **meters** of sea-level rise*". Explained more fully, "*In 2025… Greenland's and Antarctica's ice mass levels were at record lows… the Greenland and West Antarctic ice sheets may have already passed critical tipping points because of current global warming levels… With ice loss rates having quadrupled since the 1990s, these changes are likely to commit the planet to **several meters of sea-level rise**, even without additional emissions. The current warming appears sufficient to trigger this long-term increase in the loss of ice. The rate of sea-level rise has doubled in the last three decades*." As mentioned in our previous submissions, Lincolnshire is especially susceptible to severe flooding due to rising sea levels and river overtopping caused by climate-induced increases in rainfall. This has serious implications for our coastal tourist economy and agricultural productivity, with further implications for our nation's food security. Recently, we have seen the impact of Storm Claudia in Monmouth.
- "*The Atlantic meridional overturning circulation (AMOC) is weakening, threatening major climate disruptions*." **The implications of this for Lincolnshire's and UK's climate are profound, with potentially severe disruption of agricultural output.**
- "*As a result of surging fossil fuel consumption, energy-related emissions rose 1.3% in 2024, reaching an all-time high*". **Granting Egdon's planning application will add to this surge, not reduce it.**
- "*Another notable development is that ocean heat content reached a record high. This likely contributed to the on-going coral bleaching event, affecting roughly 84% of the world's coral reef area between 1 January 2023 and 31 May 2025, making it the most extensive bleaching incident in recorded history. Furthermore, ocean pH reached a record low, indicating the highest acidity on record and new evidence suggests the global planetary boundary for ocean acidification may have been crossed in 2020. Ocean acidification poses a serious threat to marine calcifiers, including some corals and phytoplankton—the base of ocean food webs."* Reference to coral bleaching and ocean acidification might sound remote from Lincolnshire's interests, but Scientists' warning on fossil fuels (March 2025) states that "every increase in fossil fuel pollution and resulting climate stress pushes ecosystems closer to tipping points and amplifies extinction risk. With (close to) 1.5^{O}C temperature rise as of 2024, the world's coral reef ecosystems—which support a quarter of ocean life and the livelihoods of a half billion people—are in crisis due to increasingly frequent and severe bleaching events from ocean heating paired with ocean acidification. Half of the world's reefs have already been lost and near total global reef collapse is projected at 2^{O}C temperature rise. An estimated 1.6% of species are projected to become extinct at the current level of temperature rise. Numerous studies have projected catastrophic species losses with continued fossil fuel pollution with, for example, the climate-related extinction of 14%–32% of animal and plant species—representing the potential loss of 3 million to 6 million species—in the next 50 years, even under intermediate fossil fuel emissions scenarios. Scientists have called for the urgent transformation of our energy system away from fossil fuels to prevent a mass

extinction event." This reinforces the calls in 2021 from the IEA and the Secretary General of the UN: "Countries should also end all new fossil fuel exploration and production". **Why are we four years later contemplating new exploration and extraction of oil?**

- "*Climate change is already affecting water quality and availability, undermining agricultural productivity, sustainable water management, and increasing the risk of water-related conflict.*" **Why add to those challenges in Lincolnshire and internationally?**

The Climate Change Committee has advised the Government to prepare for weather extremes

On 15 October 2025, Baroness Brown (Chair of the Climate Change Committee's Adaptation Committee) wrote to Emma Hardy (Parliamentary Under-Secretary of State at DEFRA) warning our government to prepare for weather extremes, stating they "*should, at a minimum, prepare the country for the weather extremes that will be experienced if global warming levels reach 2°C above preindustrial levels by 2050*" and "*at the high end of possibilities, reaching 4°C above preindustrial levels by the end-of-century cannot yet be ruled out and should be considered as part of effective adaptation planning.*" **Allowing new exploration and extraction of oil will add to the threat outlined by the CCC, not reduce it.**

Without a massive reduction in emissions, the planet is heading towards well over 2°C degrees of warming

According to the latest emissions gap report from UNEP (Off Target), even if all nations fully implement the nationally determined contributions (NDCs) submitted just before COP30, we are still on a trajectory towards 2.3–2.5°C above pre-industrial average global temperature. However, it also warns that "*nations are not even on track to meet their 2030 targets; based on policies currently in place, the world is heading for up to 2.8°C of warming.*" **Without a massive reduction in emissions by rich developed nations like the UK, we are pursuing a trajectory that condemns people to significant suffering, both now and in future generations.**

UK's Secretary of State for Energy and Climate Change for Great Britain has formally stated that the country must go "further and faster to limit global warming"

Recently at COP30 in Belem, Brazil Ed Miliband, the Secretary of State for Energy and Climate Change for Great Britain in his high-level national statement is reported to have said, "*build on the Brazilian Presidency's call for a roadmap to transition away from fossil fuels, as we cannot have progress on climate action without progress on this.*" If the UK is to cooperate with moving away from fossil fuels to uphold the Paris Climate Agreement, there should be no further development of fossil fuels. Miliband highlighted the need to, "*Go further and faster to limit global warming to 1.5°C".* These statements by the elected member of UK government responsible for UK energy policy completely contradict granting this proposed development. **If the Inspectorate grants Edgon's application, it would be going in the wrong direction and, embarrassingly, would show a lack of joined-up climate and energy policy between the UK state level and subnational jurisdictions (local councils).**

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The drilling site at Biscathorpe is close to the chalk-stream tributary of the River Bain and situated in an area of national beauty (AONB)

Biscathorpe is in the middle of the Lincolnshire Wolds National Landscape—a designated National Landscape (formerly area of outstanding natural beauty (AONB)). That designation recognises the importance of protecting our area for both environmental and economic benefits (see National Landscape's briefing paper). Both of these benefits are at risk if Egdon's application is allowed. A rare and key habitat close to the oil drilling site at Biscathorpe is the chalk-stream tributary of the River Bain. According to the Wildlife Trusts, only 200 chalk rivers are known globally, 85 percent of which are found in the UK. The UK is recognised as being one of the most nature-depleted countries in the world. In addition, according to the State of Nature Report, our wildlife is continuing to decline. We should not risk any threat to this globally rare habitat. Edgon's claimed precautions cannot guarantee there is no risk. In addition, the area's outstanding natural beauty is a significant amenity for locals and attracts visitors, providing an essential boost to the tourism industry. **All this would be put at risk by noise, light pollution of night skies, air pollution from gas flaring and venting, and increased heavy goods vehicles on attractive country roads.**

Estimates and forecasts from Egdon are inconsistent and evidence and statements are contradictory and inaccurate

Data from Egdon's Climate Change Assessment suggests that if Egdon's proposed exploration reveals more potential oil reserves than 2.7MMbbl, they will want to extract up to 6.5MMbbl, most of which will be combusted. "*The Biscathorpe-2z production profile is based on total oil production of 2.70 MMbbl or 354,947 tonnes, from 2026 to 2040*." And "*emissions calculations are based on a 'high case' estimate for total oil production of 2.70 MMbbl or 354,947 tonnes*." However, as recently as January 2025, Egdon's submission indicated low (2.7MMbbl) and high (6.5MMbbl) production scenarios. Why has this been downgraded so dramatically? It seems clear that Egdon's previous research had led them to believe that oil production might be up to 6.5MMbbl.

Since the beginning of 2025, Egdon has provided inconsistent estimates for MMbbl forecasts, suggesting a lack of robust evidence for the quantity of reserves at the proposed site. In their conclusion to "Scope 3, Category 11 Emissions Assessment" (para 9 page 26), Egdon asserts "*Total sold oil is forecast to be 2,689,607 barrels, or 354,947 tonnes ('high case' forecast production for one well) across the 15-year lifespan of the development (2026-2040)*." Their suggestion that 2.7MMbbl is a "*high case forecast*" is in direct conflict with their previously quoted range of up to 6.5MMbbl. **Are the new figures credible?**

In the "Scope 1, 2 and 3 Emissions Forecast" (para 2 page 7), Egdon appears to acknowledge they have significantly downgraded their production figures. "*Egdon has revised the production profile for Biscathorpe-2z to align with the initial planning application that considers the drilling of one well only*." In none of the planning applications were more than one well mentioned, yet even then, the high-production scenario was used. **It seems questionable for Egdon to now explain their use of only the previous low-production scenario figure, by reference to "*one well only*".**

Egdon's EIA ought to express the "*worst-case scenario*", in which case the downstream emissions should be taken to be the effect of burning 6.5MMbbl of oil. Egdon's new figures are not consistent with the application of the precautionary principle expected in an EIA.

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Regarding Egdon's Addendum to ES - Scope 3 Cat 11 Emissions 13/06/2025 Section 8 ''Comparison to Global and UK carbon budgets". The report states on page 19: *"It is recognised by the IPCC that there is a 50% chance that CO2 emissions from existing fossil fuel infrastructure (without additional abatement) would exceed the global 1.5°C budget (IPCC 2023)."* **This is a serious misrepresentation of the IPCC's statement.** The statement comes from the IPCC's Climate Change 2023 Synthesis Report—Summary for Policy Makers. What this IPCC report actually says (Section B.5) is, "*limiting human-caused global warming requires net zero CO2 emissions. Cumulative carbon emissions until the time of reaching net zero CO2 emissions and the level of greenhouse gas emission reductions this decade largely determine whether warming can be limited to 1.5°C or 2°C (high confidence). Projected CO2 emissions from existing fossil fuel infrastructure without additional abatement* ***would exceed the remaining carbon budget for 1.5°C*** *(50%) (high confidence)*."

That statement is amplified in para B.7 of the IPCC's Climate Change 2022 Mitigation of Climate Change report: "*Projected cumulative future CO2 emissions over the lifetime of existing and currently planned fossil fuel infrastructure without additional abatement exceed the total cumulative net CO2 emissions in pathways that limit warming to 1.5°C (>50%) with no or limited overshoot*." The 50% refers to the probability of limiting global warming to 1.5°C under a given **cumulative emissions** budget. It represents a 50:50 chance of staying within 1.5°C if emissions follow that budget. **It is not a forecast that solely refers to emissions from fossil fuel infrastructure.**

We are happy to provide further information if necessary. Please do not hesitate to contact us.

Yours sincerely,
Signed as members of the Lincoln Climate Commission:

Simon Croxton, Chair, Lincoln Climate Commission
Dr. Andrew Kythreotis, University of Lincoln
Mrs Ali Talbot FRSA, Chief Executive, Green Synergy
Dr Olufemi Adetunji, ODA Global Innovation Fellow
Libby John, Chair of Board of Trustees Lincolnshire Wildlife Trust
Thomas Beeken, Geography Student, University of Lincoln
Michael Hudson, Equality and Climate Change Officer, Unite Retired Members, Lincolnshire
John Firth, Hon Professor University of Liverpool, Trustee United Nations Association-Lincs.
Dr Andy Brookes, Honorary Senior Fellow, University of Lincoln.
Kerry Gibson, Director, Rethread Denim
Ellie Good, Chief Purpose Officer, Reuseabox
Rebecca Mills, University of Lincoln
Geoff Stratford, Associate, Lincoln Climate Commission
Charlotte Brooks, Director of Change, LocalMotion Lincoln
Kelly Evans MBA, Director, Social Change UK

For communication on this objection, please email:
Simon Croxton – Chair, Lincoln Climate Commission (simon@acutora.co)
Dr. Andrew Kythreotis – Lincoln Climate Commission (AKythreotis@lincoln.ac.uk)
Geoff Stratford, Associate, Lincoln Climate Commission (geoffstrat@phonecoop.coop)