

Stop the Swanage Gas Rig  
Campaign

14th September 2016

Dear Mr. Lane,

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**Re: Ecological survey results at proposed site for Swanage Oil Rig**

Darwin Ecology Ltd were instructed by Stop the Swanage Gas Rig Campaign to review the Phase 1 Habitat Survey initially undertaken by URS in April 2013 at the proposed oil rig site at California Quarry, Swanage.

The surveys by URS were undertaken at a proposed well site and access route at California Quarry, Swanage, Dorset. According to the report submitted by URS, Infra strata PLC propose a six week site preparation period followed by four to six weeks of exploratory drilling from onshore to offshore at the site. The rig will then be removed. If oil or gas are found during the drilling there will be a further six month evaluation phase and if this is successful the long term aim is to develop the site to extract the oil or gas for transportation. During the construction phase works will be during daylight hours, during the erection of the rig works and during the exploratory drilling floodlights will be used, the exploratory drilling will be undertaken continuously and flood lighting will be used as and when necessary to undertake the works.

The objective of the Phase 1 Habitat Survey was to assess the baseline ecological conditions within the application site and highlight the potential for protected species and identify requirements for further survey work. The survey results concluded that the site had potential to support common breeding birds but does not have the potential to support other notable or protected species or groups, including bats, badgers, reptiles, invertebrates and great crested newts (GCN).

Planning records show that the application requested an EIA Screening Opinion from the local planning authority and that the decision was that an EIA was not required. From the documents online in relation to this screening opinion (PL\1490\12) it was not clear whether Natural England were consulted in relation to the screening opinion given the proximity of statutory designated sites. No request for a Habitats Regulation Assessment screening was made during the planning applications although the proposed site is in close proximity to St Albans Head to Durlston Head SAC. This is despite the potential risk of disturbance to greater horseshoe bats which are a Annex II species present as a qualifying feature, but not a primary reason for site selection at this SAC and the presence of habitats that in common with many habitats can be sensitive to air pollution including NOx. However, in Natural England's response to the planning application PL\1575\13 they stated that an appropriate assessment was not required for these temporary works.

Darwin Ecology have reviewed the Phase 1 Habitat Survey report submitted by URS and have a number of comments and recommendations. The findings and recommendations are detailed within this letter.

## **Site Description**

California Quarry and California Farm is located in Swanage, Dorset at grid reference: SZ 019 773. The site lies approximately 2km east of Langton Matravers and 1.7km south west of Swanage. The site is surrounded by agricultural land and scattered farms and the coast lies approximately 900m south of the site. Habitats in the wider landscape include lowland meadows, lowland calcareous grassland, deciduous woodland and broadleaved woodland.

There are a large number of designated sites within close proximity to the proposed development. These include: St Albans Head to Durlston Head SAC which lies within 100m south of the site, Belle Vue Quarry SSSI lies approximately 740m north west, Durlston National Nature Reserve lies 1.2km east, South Dorset SSSI lies 320m south, the Isle of Portland to Studland Cliff SAC lies 2km east of the site and Townsend SSSI lies approximately 330m north east of the site. The site also lies within the Dorset Area of Outstanding Natural Beauty.

## **Findings**

Darwin Ecology has reviewed the initial Phase 1 Habitat Survey report submitted in May 2013 following the site visit in April 2013. The findings of the review are as follows:

The initial survey and report were undertaken during late Spring/early Summer 2013 which is over three years ago. No works have taken place on the site since these initial inspections in 2013, an up to date site visit and set of survey data would be required to inform the current situation at the site prior to any works commencing. It is understood that Dorset County Council have requested update surveys given the timeframes since the last surveys and best practice guidance which generally considers ecological surveys valid for up to 2 years assuming no significant changes at the site during that time. It is recommended that these surveys and the survey findings is provided to the Council in sufficient time to allow the Planning Authority to reassess these findings and ensure that they have sufficient information to determine the likely impacts and satisfy the three tests in relation to any European Protected species as per the Habitats Regulations (2010). The Planning Authority must have full ecological information to determine a planning application or consult Natural England, as the relevant Statutory Body. The Morge and Woolley cases show that the LPA must have regard to European Protected Species and satisfy itself that the three tests are met.

The site lies in a key area of the Purbeck district, surrounded by designated sites, those within 2km are listed above, within 5km there are many more designations. The site itself lies within California Farm SNCI, which was designated for the presence of species rich calcareous grassland, and within very close proximity to Durlston Country Park SNCI/NNR. The site also lies within a Nature Improvement Area called Wild Purbeck which is a government programme under the Stewardship Targets Scheme, it is one of twelve designated areas in the UK. The Wild Purbeck site is listed as being "a very special area for

wildlife, including the 10km square with the greatest diversity of plant species in the country” (Natural England).

The report covers a number of protected species and their likelihood to be found on or near the site. A full set of survey data has not been produced with enough evidence to conclude presence or absence of several protected species at the site including European Protected Species.

Within the report the site has been discounted as having low potential for reptiles and amphibians. However, the site does not appear to be sufficiently degraded to deter reptiles and amphibians. Records shows reptiles are present within 1km of the site and GCN records have been found at ponds within 280m.

The main field is was regularly grazed at the time of the initial survey, however, the field margins and wider landscape would have potential to support traversing or sheltering reptiles and further patches of rough scrub, rocks and other features provide many hibernation and refuge options for reptiles. Further surveys to determine reptile presence/likely absence are recommended prior to any works commencing to ensure that the legal protection afforded to both reptiles and amphibians is met.

There are two ponds within 280m of the site which have records of great crested newts. The report also mentions that one pond could not be surveyed during the initial survey. No Habitat Suitability Index (HSI) surveys were undertaken for the Phase 1 report which is a standard practice to provide a consistent and quantitative value on the likelihood of great crested newts using the site. GCN operate in meta populations and therefore if they are found to be present within one pond in the area then other ponds in the area will be significant for favourable conservation status for both the GCN populations and ponds in the wider area. Again, although the wider habitat on site has been stated as being over grazed, there are still numerous patches of rough scrub, rocks and many other potential hibernation/refuge options for GCN. Further presence/likely absence surveys for GCN are recommended prior to any works commencing. If the surveys indicate that great crested newts could be on site and impacted by the proposals then a European Protected Species Licence may be required to undertake works which might otherwise cause an offence.

Bat species are also recorded as being present within close proximity to the site including Greater horseshoe bats which have a hibernation site approximately 390m from the site at Townsend SSSI, measured from site boundary to designation boundary. St Albans Head to Durlston Head SAC is also designated for Greater Horseshoe bats and lies approximately 690m south of the site. No further surveys have been undertaken to ascertain whether bats are using the site for commuting or foraging purposes and the habitats present certainly provide suitable habitat for these activities. Greater horseshoe bats stay close to hedgerows and fly low when foraging and commuting, the installation of the rig and particularly the 24 hour flood lights would have a significant impact on these bats. Greater horseshoes are extremely intolerant to light pollution, the proposal of the erection of floodlights within 390m of a known Greater horseshoe bat roost could also have an impact on bats at the Townsend SSSI as well as any bat using the proposed site. No further survey effort was undertaken to establish how bats are using the site and are therefore recommended prior to any works commencing.

The report indicated the site's potential for nesting birds noting several species observed during the site survey such as House sparrow and Wood pigeon. Due to the habitats on site such as scrub and areas of rough grassland, ground nesting bird species should also be considered and further research and surveys should be undertaken to determine their presence or absence at the site prior to any works commencing. Given the site's location and the presence of migratory birds using the coastline it is likely that the site has some habitat which will be of value to bird species as is the case at Durlston National Nature Reserve. Durlston National Nature Reserve and Country Park has recorded over 250 species of bird ([www.durlston.co.uk](http://www.durlston.co.uk)).

Calcareous grassland is an important habitat for butterflies and invertebrates and further surveys could be undertaken to determine the species using the site and whether any of those species found are of conservation concern. The nearby South Dorset SSSI and Durlston NNR is home to the rare species of Lulworth Skipper butterfly *Thymelicus acteon* and 33 species of breeding butterfly ([www.durlston.co.uk](http://www.durlston.co.uk)).

## **Recommendations**

The proposed development is likely to have an impact on several protected species including bats, reptiles and GCN and the habitats on site and in the wider area. Below is a summary of recommendations.

Prior to any works commencing on site an up to date site visit is highly recommended to ascertain the current situation as the previous survey was undertaken in April 2013.

Prior to any works commencing the following protected species surveys, *inter alia*, are also recommended:

- Great crested newt surveys to be undertaken between March-June to ascertain likely presence/absence. The surveys should follow a bottle trapping or eDNA methodology and should cover all ponds within a 500m radius of the site.
- A reptile survey to be undertaken covering the full site including areas of scrub, field margins, rocks and any other features deemed to hold potential for reptiles.
- A series of bat surveys should be undertaken throughout the main bat activity season (May-August inclusive). Static detectors should also be installed throughout the season in order to gain a full set of survey data.
- A vegetation survey should also be undertaken. Several rare species of plant are recorded in the area but no investigation as to their presence at the site has been undertaken. As the site lies within close proximity to a large number of designated sites NVC vegetation surveys should be undertaken between May-August. The previous site survey was undertaken just outside of the optimal ecological survey period for assessing grassland vegetation. This survey will help to ascertain whether there are any habitats of particular value that could be avoided through redesign of the access road etc.
- Breeding bird surveys to ascertain the value and potential impact to nesting birds and to help determine any mitigation or post development enhancements.
- Invertebrate surveys to ascertain those species using the site and whether any species of conservation concern are present.

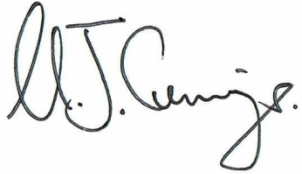
All surveys above must be undertaken following best practice guidelines and at appropriate times of year to obtain robust data to allow the Planning Authority to ensure that they have met all their obligations in relation to protected sites, habitats and sites. The full survey

details should be made available to the planning authority for reassessment prior to the commencement of any site clearance or works on site.

Once full survey data has been collected for the site it will be possible to put in place any necessary mitigation in order to avoid any impacts on protected species or their habitats.

If you have any further questions please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. J. Cummings'.

**Michael Cummings BSc MSc MIEEM**  
**Director, Darwin Ecology Ltd.**