

Christie Burns

Senior Planning Officer
Cumberland Council



By email to: development.control3@cumberland.gov.uk
30/01/2026

Application Number: 4/25/2198/0F1, Erection of visitor centre with café/shop, group room, staff/volunteer, toilet facilities and car park; consolidation, repair and installation of interpretive sculpture to Towsey Hole windmill; refurbishment of existing tern hide; new bird hides/viewing screens, pathways, gateway features, street furniture and demarcation of spaces at existing car park; enhancement of wildlife habitats; associated landscaping and drainage infrastructure; and maintenance of byway with restricted vehicular access (the iron line project)

Location: Land at Hodbarrow Nature Reserve, Millom

Applicant: Cumberland Council

Dear Ms Burns

Thank you for consulting RSPB in respect of the above application. Please accept this letter as my response regarding the above application for a visitor centre and associated facilities at Hodbarrow on behalf of the Royal Society for the Protection of Birds (RSPB).

We wish to make the following **comments** in response to the newly submitted documents and the Applicant's response to our letter dated 12/01/2026 on the application cited above based on the following which we believe will result in reduced impact on the continued operation of our reserve at Hodbarrow as a result of the proposed development.

1. Potential impacts to Natterjack Toad

The RSPB

The RSPB is passionate about nature and dedicated to saving it. Since we started on our mission in 1889, the threats to nature have continued to grow but we've grown to meet them too.

We're now the largest nature conservation charity in the country, consistently delivering successful conservation, forging powerful new partnerships with other organisations and inspiring others to stand up and give nature the home it deserves.

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The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

Along with other environmental groups, we have fought for many years to ensure habitats that support rare and vulnerable wildlife are protected from the worst impacts of human development.

We are also the owner and manager of part of the application site, the RSPB's Hodbarrow Nature Reserve, having purchased 105ha of the site of the former Hodbarrow Iron Mine in 1986, 18 years after the mine closed.

Detailed comments

1.0 Potential impacts to Natterjack Toad

The natterjack toad populations of the UK are largely confined to small and isolated populations highly vulnerable to extinction from changes to their specialist habitat and sensitive life histories. The natterjack toad is classed as "Endangered" in England according to IUCN Red List criteria, an internationally recognised method for assessing extinction risk.

Natterjack Toad, *Epidalea calamita* is protected in the UK under the Wildlife and Countryside Act, 1981. They are a Priority Species under the UK Post-2010 Biodiversity Framework and are listed as a European Protected Species under Annex IV of the European Habitats Directive,

The Duddon Estuary is one of the few relative strongholds remaining for the natterjack toad and is of national importance to the persistence of the species in the UK, this is recognised with the species being a Designated Feature of the Duddon Estuary Ramsar site and Notified Feature of the Duddon Estuary SSSI.

We note the Applicant has now submitted a response in respect of our previous comments and the points below, are those which we wish to respond with, on the basis of acceptance of the other areas in the response by the Applicant.

1.1 Gully Ladders

In response to our previous comments on Gully Ladder checks – (Under section 4.0 Operational Management, 4.1 Management Actions – Gully Ladders, the Applicant states that "*gully ladders will be checked during the monthly drainage channels and gullies maintenance, as per the SuDS Operation and Maintenance Manual*"). The Applicant has stated that they have retained the recommendation for monthly checks of the gully ladders within both the Amphibian Mitigation & Management Plan and the CEMP, whilst we accept that these are routine checks, we would still like to see weekly checks, at least for the initial period after installation (6 weeks or so) They should then be checked monthly, mainly to make sure that there are no issues with the installation. There have been cases where they have been removed by people who didn't know what

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they were, quick check to make sure that the ladders remain in place and that there is no evidence of trapped amphibians unable to exit the drains doesn't seem onerous or unreasonable once a week for 6 weeks.

1.2 Hibernacula

We are content that the final design and location could be agreed by condition, should this be appropriate.

Summary

The majority of our previous concerns have been assuaged as a result of the recent submissions by Applicant; our ongoing comments represent the area within which we still maintain concerns.

Yours sincerely

Jeremy Sutton, Senior Conservation Officer, North West England

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