

Jeremy Sutton
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Sent via email to [REDACTED]

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13 May 2026

Our ref: 551959lt13May26DV01_L01_GG_Response

Dear Jeremy,

IRON LINE PROJECT- RESPONSE TO RSPB

The following letter has been prepared in response to the comments below provided by RSPB provided on the 20/04/2026 in relation to the planning application 4/25/2198/OF1 *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).*

The additional information/clarifications requested have been provided below.

RSPB Comments

Condition 5 – the Landscape and Ecological Management Plan (LEMP)

We are broadly happy with the document as revised March 2026, but have the following comments -

5.1 – Management of Gully Ladders, *we support and acknowledge the move to check these weekly for the first 6 weeks following installation, with a move thereafter to monthly, however we would ask that IF, natterjack is found to be present in the gully, firstly, contact MUST be made with Natural England to obtain a licence, and removal MUST only be undertaken by a natterjack toad licenced ecologist, and secondly we would like to see a return to weekly checks for the following 6 weeks, before a review as (although unlikely) the gully ladders may not be working, we do though support the applicant's assertion that their presence is unlikely and precautionary.*



6.1 – Formalisation of the Paths and the BOAT, the text within the Management section (page 21), suggests that RSPB will be responsible for maintenance of the Paths as it is currently, however, it is our view as owners of the site, that improvements made by the Applicant, MUST be covered under the yet to be finalised Heads of Terms agreement as maintainable by the Applicant.

6.5 – Species Specific Actions, Natterjack Toads, Enhancements – Creation of Hibernacula, we support the indicative location of the proposed hibernacula (Appendix F), but not their construction, having reviewed the site again in 2026, we have drafted a natterjack plan for the reserve which includes these features.

The northern section of 3 artificial hibernacula is to be located within an area cleared by us as part of Natural England's Species Recovery Programme, (still we note referred to by the applicant as Species Recovery Trust, despite requesting amendment). We agree that these could be artificial but request that their construction is undertaken in Accordance with Amphibian & Reptile Conservation's (ARC) latest guidance, see our Appendix A.

The Southern 2 hibernacula should be created by managing existing banked habitats (soil scraping). This negates the requirement to bring pre-used concrete into the Red Clay Pond area of the reserve, and as such this is considered the best option for enhancement, with ongoing management undertaken by us, formation should be following on-site discussion and agreement with us.

Greengage response

5.1 – Management of Gully Ladders,

We have updated the LEMP to include the following detail:

"In the event that a natterjack toad is found during the gully checks, Natural England must be contacted for further advice. A licenced natterjack toad ecologist must be contacted too who can safely move the natterjack to a place of suitable refuge. Dependent on Natural England's advice, a European Protected Species (EPS) licence may be required for works to proceed. Any revised monitoring of the gully's or mitigation measures as specified by Natural England will be addressed in an updated LEMP."

6.1 – Formalisation of the Paths and the BOAT Greengage understand that improvements made by the Applicant will be set out and secured through the Heads of Terms agreement with RSPB, including the allocation of responsibility for the ongoing maintenance of the paths and the BOAT. The wording on page 21 has been updated accordingly.

6.5 – Species Specific Actions, Natterjack Toads, Enhancements

Greengage agree that the creation of natterjack toad hibernacula should be undertaken in line with Appendix A shared within the RSPB response. The LEMP and AMMP have been amended to incorporate this document to secure the delivery of this habitat creation.

RSPB Comments

Condition 6 – the Construction Environmental Management Plan (CEMP)

We are broadly happy with the revised CEMP, but have the following comments –

3.1 Works Associated with the Visitor Centre Installation of Gully Ladders, (page 14), *We welcome the installation of Gully ladders and refer to our comments above (5.3 of the LEMP) for post-installation management.*

Hardstanding removal and relocation and Habitat Creation of Other Neutral Grassland, *per our comments (6.5 of the LEMP) above we do not wish to see the hardstanding material reused within the reserve.*

Appendix C, Biodiversity Protection Zones and Actions on the Nature Reserve, *we are broadly happy with this plan, but note that there is no / incomplete protection shown for the following Notable Plant Species in association with the path works, as identified in Appendix E, Notable Habitat and Plant Maps –*

- *Eyebright (page 95)*
- *Quaking Grass (page 95)*
- *Northern Marsh Orchid (page 96)*
- *Heath Speedwell (page 96)*

As such we see it as essential that this area is included and covered in line with the proposed fencing and signage.

Greengage Response

3.1 Works Associated with the Visitor Centre Installation of Gully Ladders.

As addressed in the commentary above.

Hardstanding removal and relocation and Habitat Creation of Other Neutral Grassland

Greengage have removed the recommendation for the hardstanding re-use and updated the LEMP and AMMP to reflect that the natterjack toad hibernacula will be created in line with Appendix A provided.

Appendix C, Biodiversity Protection Zones and Actions on the Nature Reserve

These species are associated with the grassland, and the proposed works are confined to the paths, scrub and/or existing desire lines. Greengage have updated the BZP to cover all areas that abut areas with the locations of eyebright, quaking grass, northern marsh orchid and heath speedwell as shown in shown in Appendix E.2 on pages 58 and 59.

RSPB Comments

Condition 7 – the Amphibian Mitigation and Management Plan (AMMP)

We are broadly happy with revised AMMP, noting our comments under the LEMP within this response. There are also 3 further points we wish to make -

- *The plan still references funding from the Species Recovery Trust (e.g. p3, p7, p11). This is not correct. Funding was from Natural England's Species Recovery Programme. This should be updated throughout. This is not the first time we have made this comment.*
- *P3. The 2024 record was of a single spawn string found in May (not 5,000 tadpoles in April). ID was not confirmed but it would be a late record for Common Toad and therefore the presumption is that this was a Natterjack spawn string.*

- *Ponds (pool creation) are shown on the map in Appendix C, although there is no mention in the document. They align with where we have created pools as part of scrub removal operations. Again, we wish to remind the applicant that these are existing features and not being formed therefore as part of the Approved Application.*

Greengage Response

- Greengage have updated the documents to reference Natural England's Species Recovery Programme.
- Greengage were provided with the results of 5,000 tadpoles in April 2024 by the RSPB Reserves Warden (see email Appendix A). We were first informed of a potential spawn of natterjack toad spawn in the RSPB response in July 2025 which stated:
 - *"Our Ecologist (and RSPB Natterjack lead) did record a single 'probable' Natterjack spawn string from the Red Clay Pond in 2024. Although this was not definitively identified and therefore not shared with the Applicant, but it is our qualified assumption based on location and considerable experience on the part of our ecologist in surveying the Duddon Estuary population, that this was probably from Natterjack rather than Common Toad as assessed by the Applicant as this location is sub-optimal for Common Toad."*

Greengage have updated the AMMP to differentiate the 5,000 tadpoles identified in April 2024 and the probable natterjack toad spawn string was identified in May 2024.

- Layer Studio have relabelled the mapping of these existing ponds to make it clear that these do not form part of the planning application and have been created by RSPB.

RSPB Comments

4.0 Condition 8 – the Notable Plants Method Statement (NPMS)

We are at a loss to explain why the applicant has not produced a standalone NPMS in response to this condition, however our comments are covered under those relating to the CEMP as this is where the information appears to be located.

Greengage Response

The CEcMP is intended for use by contractors and is therefore structured around the mitigation measures required at each phase of construction, rather than by ecological receptor. This approach ensures that the required actions are clear and practical to implement on site, with all relevant information contained within a single document, reducing the need to cross-reference multiple documents and minimising the risk of omission.

Yours sincerely



Laura Thomas
Senior Consultant

T: [REDACTED]

E: [REDACTED]

For and on behalf of Greengage Environmental Ltd

APPENDIX A RSPB UPDATES



Dave Blackledge

To  Laura Thomas



17/04/2024

 You forwarded this message on 19/03/2025 12:25.



Hi Laura

Hope all's well with you. We've started the natterjack monitoring for the season. As you can imagine, water is still at winter levels – there is a lot of flooding and it's still quite cold!

To date there are around 5000 tadpoles in the red areas marked unidentified tadpoles on the attached map (pool grid refs SD 1782 7851 and SD 1787 7851) These are assumed to be common toad until proved otherwise.

Around 4 or 5 adult male natterjacks calling at 9.35pm at the location in green (SD 183 785) just beyond the reserve boundary – sheep grazed flooded field.

We have deployed two Sound Meter Minis to record nightly between weekly surveys near pools on the reserve – will keep you updated on results as we continue to monitor

All the best