



Millom Striders Running Club
Andy Burn,
16 Buttermere Drive
Millom
LA18 4PL

03/07/2020

Re: Proposal for installation of a SuDs compliant running track at Millom School, Cumbria. Potential Impact upon the Natterjack toad *Epidalea calamita*.

Dear Mr Burn,

As I understand, the works proposed involve the installation of a 1km running track at Millom School, Millom, Cumbria (Grid reference SD173805, Figure 1).

The proposed running track will be constructed using sustainable materials and it will be SuDs compliant. The track will be manufactured and installed by Caloo Ltd www.caloo.co.uk. Work will involve excavations of a 2.5m wide strip of land approximately 1.5m inwards from the boundary of the existing playing field (Figure 1). Excavations for the track will be to a maximum depth of 235mm, although the majority of the track (801m) will only require excavations of 135mm. Between 100 and 200mm of loose stone will be laid in the excavation and 35mm of SUDS Bond® Permeable Paving Solution will be laid on top to create a running track that lies flush to the adjacent turf.

Desk based study: ARC carried out a desk based exercise (using ARCs Internal database Living ARCive and information freely available using [MagicMap](#)) to identify habitats that might support natterjack toads and instance of natterjack toads recorded within 1km of the proposed development. Data searches were limited to the period between 2017 and 2019.

Results: The area of the proposed works lies approximately 50m (at its closest point) to the west of the Duddon Estuary RAMSAR Site and the the Duddon Estuary Site of Special Scientific Interest (SSSI) for which the natterjack toad *Epidalea calamita* is listed as a feature. The Morecambe Bay Special Area of Conservation (SAC) also lies approximately 50m to the east of the proposed development, and includes the great crested newt *Triturus cristatus* as a listed feature.

No records of natterjack toads were found within 1km of the proposed development site (Figure 1). Natterjack toads are known to utilise habitat at Millom Iron Works Local Nature Reserve (Grid reference TL048380) and breeding was recorded at pools within this site in 2019. Millom Iron Works lies approximately 1.2km to the South West of the proposed development site.

Site visit: ARC staff visited the site on Tuesday the 30th of June 2020 to identify areas within the proposed development that might offer suitable breeding or resting habitat for the natterjack toad.

Results: The site consists of an area of amenity grassland (Figure 2) measuring approximately 4ha in size. The site is bound to the east by the Cumbrian Coast rail line (Figure 3) which (in parts) separates the proposed development from the adjacent designated areas. To the North West, the site is bound by the A5093, which serves as the main access route into Millom town centre. To the North East, a small number of private residences served by an access track 'Aggie's lonnin' border the site. A small area of broadleaved woodland (predominantly willow) exists along the boundary of the dwellings and Aggie's Lonnin (Figure 4). To the South West, the site is bound by an area of built up land including Millom Hub and Millom School.

Although the site is known to flood in the winter (pers comm's Andy Burn 30.07.2020), no ephemeral or standing waterbodies are known to be present. No areas of bare sandy soil were identified and no

