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Dear Candice Howes,

IRON LINE PROJECT- RESPONSE TO TETRA TECH

The following letter has been prepared in response to the table below provided by Tetra Tech Limited provided on the 05/02/2026 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.

Document	Element	Tetra Tech	Greengage Response
SHRA	Proposed works	Bird mapping only appears to show presence of one species (as indicated with green dot)	Greengage have updated maps to reflect the records provided by RSPB in December 2025 which we will share on confirmation from RSPB that we have permission to share. Some of the records have multiple species sharing the same location points

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		<p>however more species were recorded according to the legend. Mapping should show which species were recorded where on site in order to inform the assessment therefore further clarity is required within this mapping. We recognise the site is large and it is difficult to show all species recorded in single locations in one drawing. Consideration should be given on how to improve data clarity prior to final submission. We note a figure has been provided showing proposed design, it is not possible to zoom into this on the PDF to scrutinise detail. A separate PDF is required to allow this to be reviewed.</p>	<p>which is likely the result of the data being gathered from a fixed point on a transect survey.</p>
4.4 Natterjack toads, great	4.4.1 Survey Approach & Methodology	<p>Please provide evidence of RSPB methodology.</p>	<p>The breeding bird methodology, as stated by the RSPB's Conservation Data Officer, is as follows: "<i>Bird Survey methods: Breeding birds wider site bird surveys are completed using BBS methodology on a set transect, Tern records are completed</i></p>

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<p>crested newt and common amphibians</p>			<p><i>through almost daily surveys completed by staff throughout the breeding season with the peak numbers used for the end result. Wintering bird numbers are collected through ad-hoc observations."</i></p>
	<p>4.4.2 Survey Approach & Methodology</p>	<p>Please provide the evidence of RSPB survey data for years 2025 and 2024 which supports likely absence of GCN. If this cannot be provided, then please provide evidence of communication from RSPB that their 2025 and 2024 surveys have returned no record of GCN.</p>	<p>Greengage have requested permission from RSPB to share the data however can confirm that on the Hodbarrow Reserve dataset created by RSPB, shared with Greengage on the 9th December 2025, which covers data from 2014 to March 2025 there are no records of Great Crested Newt (GCN). Greengage have requested permission to share the data with Tetra Tech. It should also be noted that Natural England granted Species Recover Grant Funding to secure habitat works including scrub clearance and pond creation to RSPB. Following which Natterjack toad surveys in 2024 and 2025 inline with ARC guidance have been conducted on the waterbodies present that were carried out via torching ponds at night and also included searching for spawn. This survey work did not confirm natterjack toad presence and additionally no GCN were identified.</p>
	<p>4.4.3 Impact assessment</p>	<p>The level of precaution that has been applied within the Amphibian Mitigation and Management Plan (AMMP) for Natterjack toad is considered acceptable for GCN also. Request that the AMMP be updated to include reference to GCN so</p>	<p>the Amphibian Mitigation and Management Plan and Construction Environmental Management Plan (CEMP) have been updated to include reference to GCN and licencing advice should GCN be discovered.</p>

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		<p>that a mechanism is in place to halt works and seek licensing advice should a GCN be discovered.</p>	
	<p>4.4.4 Mitigation and compensation measures</p>	<p>A detailed Amphibian Method Statement (to include EPSML if required) must be included within the CEMP, which includes toolbox talks (with identification of target species); mitigation for impacts (e.g. habitat loss); timing of works to avoid disturbance during the hibernation period; and a natterjack toad licenced Ecological Clerk of Works to supervise the pre-constructions works at the visitor centre and wider site. As noted above – GCN are not fully included within the AMMP. Request that the AMMP be updated to include reference to GCN. Whilst 4.2 of AMMP refers to no management</p>	<p>The Amphibian Method Statement includes advice regarding the potential requirement for a Natural England licence if found, as well as toolbox talks and appropriate timing of works which includes the months and temperatures. The proposed works are limited to scrub habitat and informal desire lines, which represent suboptimal habitat for natterjack toad. To provide ecological enhancement, Greengage have recommended the creation of five hibernacula.</p> <p>Given that natterjack toads have distinctive characteristics and are readily identifiable, it is considered that a suitably qualified ECoW will be sufficient to oversee the works. However, additional precautionary wording has been included to confirm that if a natterjack toad is encountered, works will cease and a Natural England licence will be required. Any further vegetation works in such circumstances would need to be undertaken in the presence of a natterjack-licensed ECoW.</p> <p>Greengage have also updated the Amphibian Mitigation Plan and the CEMP to include specific reference GCN, where relevant.</p>

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		<p>undertaken during the hibernation period this is not explicitly stated for construction / clearance activities – request to update 3.1 for avoidance of doubt – noting that this document will be used by contractors on site who do not necessarily know what a hibernation period is or when it runs from and to. Suggested phrasing provided with last consultation response.</p>	
	4.4.5 Biodiversity / Habitat Enhancements	<p>Please provide evidence of:</p> <ul style="list-style-type: none"> • Agreed responsibility for ongoing management and maintenance. • Note Langton et al (2001) (Great Crested Newt Conservation Handbook) stated that hibernacula should contain “Stone, rock, clean brick rubble (without cement residues) 	<p>-RSPB have agreed to take on responsibility to manage the hibernacula.</p> <p>-RSPB requested that enhancement features that could benefit the primary competing species common toad <i>Bufo bufo</i> were removed For this reason the NE guidance advice note for GCN hibernacula creation was not explicitly followed and consideration was given to what the natterjack toads would seek for in hibernacula given that the aim of the site management is to prioritise natterjack toads and not GCN based on historical natterjack presence. Natural England have restricted new materials being brought onto site which has fed into the designs for the hibernacula. Designs for hibernacula will</p>

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		<p>and old or misfired bricks can be used in a similar way”, GCN mitigation Guidelines (2001) state use of “inert, clean fill, hardcore, brick rubble”. Natterjack toads occupy sandy burrows and so welcome the inclusion of sand within hibernacula to increase suitability for them. Request that any concrete used is cleaned before use to remove any residues or harmful materials that may alter pH or other sand/soil chemistry.</p> <ul style="list-style-type: none"> • Noted no new ponds so no specification required. 	<p>be worked through and agreed with RSPB. We have added that concrete will be cleaned to the Amphibian Mitigation Plan and LEMP.</p>
	4.7.2 Proposed visitors centre	<p>A ground level tree assessment must be completed on any trees within the proposed visitors centre area (or proposed disturbance area, including a 30m</p>	<p>As agreed in our previous response, no trees with suitability for bats are in the area proposed for the Visitor Centre. Therefore, there is no justification for further GLTA survey work.</p>

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		buffer), that will be affected by the works.	
	4.7.3 Bats and buildings	Clarification is required as If these buildings, structures or cliffs are to be impacted (directly, or via noise, lighting or vibration) then roost presence / likely absence must be determined, including the possibility of hibernation roosts.	<p>No works are proposed to the cliffs or the lighthouse, so these features will not be impacted. The bird hide and windmill are the only structures to be refurbished as part of the scheme. The bird hide lacks the required features to offer any bat roosting suitable and is extremely exposed to the extreme wind conditions and temperature fluctuations. It is predominantly made up of concrete with a flat roof.</p>  <p>The windmill was described in the PEA as the following <i>"structure had partially collapsed and had no roof enclosing the structure. The stone walls were mainly well pointed with mortar, with very few crevices present internally and externally. The few crevices that were accessible from ground level were inspected with a torch and no bats or signs of bats were seen. The structure is extremely exposed to the weather, being situated in an open location on top of a hill on the coast. This, in combination with the lack of roof and very limited number of crevices present in the stone walls, is likely to create sub-optimal</i></p>

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			<p><i>roosting conditions for bats during both summer and winter. During the survey of the compartment, a group of teenagers were seen sitting in the base of the windmill, smoking. The windmill is also therefore likely to be subject to fairly regular disturbance."</i></p> <p>Greengage confirmed in the PEA update that site conditions remained the same as previous survey.</p> <p>The surveyor competencies are Lorraine McKee (ACIEEM) of Appletons, who carried out the PEA, has over 10 years' experience as an ecologist and is an Associate member of the CIEEM. She has a background in practical survey work and as an Ecological Clerk of Works. She holds both a Level 1 Bat License and a Level 1 Great Crested Newt License and her survey experience includes Preliminary Ecological Appraisals/UKHab and invasive species surveys as well as surveying for protected species and preparing mitigation strategies for licencing purposes with a specialism in badgers. Lucy Gibson has over seventeen years' experience in professional ecological consultancy, specialising in protected species surveys, mitigation and licencing. Since graduating with an MSc in Conservation in 2001, she has worked in the nature conservation sector in a variety of roles, including as Biodiversity Support Officer for the Bat Conservation Trust, and as Conservation Projects Officer for Ashford Borough Council, as well as undertaking voluntary conservation work and bat work. She has been a full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) since 2006, and have held a Natural England bat licence since 2004. In 2015 she successfully applied</p>

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			<p>to Natural England to become a Registered Consultant for the Bat Mitigation Class Licence, under which licence she has registered numerous development sites. She was Head of Ecology at Lloyd Bore Ltd (Kendal) for nine years, before she left to pursue a freelance career in ecological consultancy in 2016, as Lucy Gibson Consulting. As an ecological consultant, she has undertaken numerous protected species surveys, ecological scoping surveys, Phase 1 habitat surveys, Habitats Regulations Assessments, have obtained and managed many bat EPSM licences and have provided ecological advice to several local planning authorities, including on major applications, such as Carlisle Airport. She has worked as Lead Ecologist for Copeland Borough Council on the Iron Line Project since May 2021, managing and undertaking survey work at Hodbarrow Reserve with Appletons, and attending regular project meetings with the design team to provide ecological advice and guidance.</p> <p>Greengage confirm from the updated PEA in March 2025 that the windmills conditions remain the same, it still has no roof structure, situated on the top of the hill on the coast and not sheltered from external extreme elements exposing already limited shallow crevice features to not only high fluctuations in temperatures but significant wind conditions. These extremes and crucially constant exposure to high winds are known to be unfavourable conditions for bat roosting in thus reducing reasonable likelihood of the structures being used by any bat species. Based on the results of the assessment the bat roost potential within these structures has already been determined</p>

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			<p data-bbox="1084 264 1928 416">in accordance with Bat Conservation Trust (BCT) guidance and in accordance with Figure 2.1 of the BCT Guidance, where there is no reasonable likelihood that bat surveys no further survey work are required and cannot be justified.</p> 
	<p data-bbox="392 1086 595 1198">5.1 Local and further non-statutory' sites</p>	<p data-bbox="685 1086 1048 1278">An assessment of potential impacts on Local and further non-statutory' sites is required.</p>	<p data-bbox="1084 1086 1928 1390">There is one County Wildlife Site located within 2km of the site, this is Millom Marsh located approximately 1.26km north assigned for its hibernation and foraging areas for natterjack toad. This is on private land so any visitors to the Iron Line would not cause an increase in recreational pressure to this site. Greengage considers that where potential construction impacts have been assessed and mitigated for with regards to statutory sites immediately adjacent to the development, this also</p>

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			<p>provides mitigation for non-statutory sites located further afield especially one located 1.26km. Impacts to natterjack toad populations within the surrounding area been assessed and mitigated for. The development seeks to provide enhanced and improved access to alternative greenspace and does not increase the population of residents therefore there will be no increased recreational pressure to surrounding areas. It is noted that any works affecting SSSIs will require NE assent, in addition to HRA adoption by both the Local Planning Authority and NE.</p>

Yours sincerely



Laura Thomas
Senior Consultant



For and on behalf of Greengage Environmental Ltd