

Candice Howes, Associate Ecologist  
Tetrattech  
Sent via email to [REDACTED]

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23 January 2026

Our ref: 551959lt23Jan26FV01\_L01\_GG\_Response

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 07/01/2026 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	Action(s) required	Greengage Response
HRA	1.1 Proposed works	Further detail/clarification is required showing location of works (specified on maps) and location of compound areas; and further detail / method statement for proposed activities and schedule of works.	The contractors, Storey's, have provided an updated map clearly identifying the locations of the proposed works and compound areas (see Appendix A) and Storeys have supplied a more detail method statement outlining the

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		<p>Separate Masterplan is available, however please can a version be provided with labelling as well as a method statement for proposals and associated program /schedule.</p>	<p>planned activities, associated timelines, and any embedded mitigation measures. A range of measures have already been set out within our reports to ensure appropriate site management and mitigation of potential environmental effects. These include:</p> <ul style="list-style-type: none"> <li>• Site Compounds: To be located on existing areas of hardstanding and at least 30 m away from sensitive areas, with fencing or barriers to prevent encroachment within the 30 m buffer.</li> <li>• Compound Location: To be positioned as far from the lagoon as reasonably practicable.</li> <li>• Timing of Works: Activities will be scheduled to avoid sensitive periods and reduce potential impacts on wildlife.</li> </ul> <p>These embedded mitigation measures will be implemented throughout the works to ensure appropriate site management and effective control of construction-related impacts.</p>
	1.2 Screening	<p>The screening assessment for 'Surface water pollution and ground water pollution degrading habitats' must be amended so that it does not include mitigation measures.</p> <p>Surface water pollution and ground water pollution degrading habitats on the SAC are</p>	<p>The no works within 10 meter is not a mitigation measure as it is integral to the design. The report is stating that there will be no works within 10m of the Estuary habitat as a result of the scheme and as such no LSE's are predicted.</p>

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		<p>considered LSE as for purpose of screening, you may not take into account any mitigation (ie avoidance or reduction) measures i.e avoidance using 10m buffer zones. You may take into account measures which are “integral” to the plan or project, but as its not certain this measure is integral or not, it is safest to assume that it is not. The sAA is to be updated to reflect this in Table 3.1 and include mitigation to avoid ‘reduced water quality’ in Section 4 for construction and operation.</p>	
	<p>1.3 Appropriate Assessment</p>	<p>The appropriate assessment should be amended to:</p> <p>Clarification is required, ideally with areas of specific works and visitor centre to be depicted on maps / plans covered above</p> <p>The correct test must be used at Shadow Appropriate Assessment stage to allow the competent authority to reach a conclusion of no adverse effect on the integrity Issue addressed.</p> <p>Further details for the method of foul water and surface drainage systems are required including when the foul / surface water system will be operational. This is now considered appropriate with further detail</p>	<p>It is understood that the first statement is in relation to the potential impacts of the existing access road on overwintering birds associated with designated habitats. The road runs adjacent to only a small portion of the lagoon (approximately 120 m), is largely screened by existing scrub, and any resulting disturbance is considered not significant. Birds in this area are habituated to vehicle movements due to cars accessing the caravan park from Mains Gate Road, which lies a similar distance from the lagoon and extends over a longer stretch. While vehicle numbers to the visitor centre may increase along this section, the combination of low speeds, habituation, and limited exposure</p>

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		<p>provided in a Surface Water Management Plan.</p> <p>Mitigation measures must be detailed to demonstrate no adverse effect to site integrity at Appropriate Assessment Reference the assumptions made to demonstrate there is ample area of lagoon available for all species. Further detail is required.</p> <p>Details on how the restrictions to traffic on the BOAT will be implemented and enforced and who will have responsibility for this Required.</p> <p>Details on the extent of the bund. Provided and considered acceptable.</p> <p>An adaptive Visitor Management Plan is included, including appropriate funding and governance for all mitigation measures (such as wardening, which would be required in addition to current RSPB duties). Clarification is required on how this will be secured.</p>	<p>indicates there would be no significant increase in disturbance to edge habitat or overwintering bird species, based on the existing baseline of unrestricted vehicle use. The scheme will reduce the overall number of vehicles accessing the lagoon area through the closure of the BOAT to all but emergency and maintenance vehicles. Consequently, regular vehicular disturbance in proximity to much of the lagoon edge habitat is expected to be lower than under the current baseline of unrestricted vehicle access.</p> <p>Greengage are aware that the applicant is committed to going through the process of the closure of the BOAT. Access along the BOAT will be formally restricted through physical measures (e.g. lockable bollards) and signage installed at each access point. These restrictions will permit use only by emergency and maintenance vehicles, as previously described, thereby preventing general visitor access beyond the designated car park. Responsibility for maintaining and enforcing these restrictions will rest with the site operator, in coordination with the Local Authority, RSPB and other relevant stakeholders.</p>

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			<p>With regard to the visitor management and associated governance and funding mechanisms, these will be developed in detail once an operator has been confirmed. It is therefore proposed that preparation and implementation of the VMP be secured by planning condition, to ensure the measures are appropriately designed, resourced, and enforceable prior to operation of the visitor centre.</p>
BNG	2.7 BNG Metric	<p>Clarification is required to show what habitats will be lost (onsite) and which habitats will be created.</p> <p>Please can a label/identifier/explanation be added to the user notes box in the metric to allow us to cross-reference between the different parcels on the pre &amp; post-dev plans.</p>	<p>Please see attached to email.</p>
		<p>Any habitat unit requirements should be revisited following amendments to the metric.</p> <p>The approach to offsetting for the development will be secured with a condition and any onsite offsetting accompanied by a</p>	<p>The mitigation approach has been reviewed and clarified. As the Lowland Meadow habitat will now be retained as such bespoke mitigation through translocation is no longer required. The report has been updated to reflect this change and to clearly present the final habitat creation proposals on a plan.</p>

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		Habitat Management and Monitoring plan (HMMP).	
	2.8 Bespoke mitigation	The habitat creation proposals should be summarised clearly and presented on a plan.  Please can this be provided (or version of the post-dev plan updated) with labels and overlay the masterplan (if possible).	Provided with updated application.
NVC	3.2 Visitors centre	More information is required on the suitability of the receptor area to receive the translocated grassland.  Translocation methods including how the receptor area will be prepared, managed and remediation plans will be secured by condition of a Vegetation Translocation Method Statement included in the CEMP, which will be submitted to the council for approval before works commence.	As the Lowland Meadow habitat will now be retained as such bespoke mitigation through translocation is no longer required.
Protected and Notable Species			
4.1 Notable plants	4.1.1 Survey validity	The Phase 3 survey data has not been updated and requires a review of validity by a professional Ecologist and a clear statement provided with appropriate justification.	Greengage clarify that the 2025 update habitat survey was not seasonally constrained. It took place on 3rd and 4th May 2025. The survey author concluded that any minor seasonal limitations were addressed as far as is reasonably practicable and are not

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		<p>This information should be used to inform a Notable Plants Method statement that should cover the protection of rare plants on-site, with detailed maps of the locations of plants and appropriate protection measures.</p>	<p>considered a significant constraint for the purposes of this assessment. It was further noted that, given the habitats have remained largely unchanged since the Phase 3 notable plant survey in 2022, it is reasonable to conclude that the species composition is likely consistent with the earlier survey results.</p> <p>The areas affected by the development comprise predominantly scrub, hardstanding, and small pockets of grassland that are existing desire lines. As such, provided the habitats are appropriately protected during construction, the species they support will also be safeguarded. The scheme will further enhance some areas through the removal of invasive species and management of scrub encroachment, which will provide ecological benefits to the site.</p> <p>The CEcMP is designed for use by contractors, therefore, it is structured around the construction mitigation measures required at each phase of development rather than organised by ecological receptor, ensuring that the required actions remain clear to follow. Chapter 3.2 includes a Notable Plant Mitigation Strategy which</p>

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			clearly lays out mitigation as part of the pre-works actions to protect notable plants associated with that phase of works.
4.2 Breeding birds	4.2.1 Survey Approach & Methodology	<p>Further detail on methodology and survey approach is required along with any justification for a non-standard approach and how this is sufficient to adequately support mitigation planning, taking into consideration the site's status as an internationally designated area for its bird species assemblage.</p> <p><b>Section 2.3 of Phase 2 Addendum Report provides appropriate justification on approach which was agreed with NE &amp; RSPB.</b></p>	Noted
	4.2.2 Mapping	<p>A map (or series of maps) is required to show locations and details of non-breeding / possible or probable / confirmed breeding status; and notable status of the birds of Conservation Concern (red &amp; amber species).</p> <p><b>Table 3.3 in the Phase 2 Addendum report lists individual status with presumed breeding. Please can maps/series of maps be included in the addendum to show locations?</b></p>	Noted. As set out in the reports, the tern and gull islands are the locations of the breeding colonies for the qualifying species. Please refer to Appendix B for additional locations of birds during the breeding season provided by the RSPB in December 2025. Due to multiple species sharing the same location points, and the sensitive or restricted nature of some species records, we have provided the general locations where bird species were recorded during the breeding season, together with a list of all bird species recorded during this period.

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	4.2.3 Importance Value	<p>Further justification is required for the local level of importance assigned to breeding birds.</p> <p>Review number of breeding pairs against that of Qualifying Features to determine importance.</p>	<p>Although some species are Red or Amber listed, the scrub habitat is widespread and abundant locally, and the species are common and widespread within Cumbria and the UK, meaning the site does not support any rare or scarce breeding populations. Consequently, the geographic value of the visitor centre and car park habitat is assessed as Local, in contrast to the adjacent nature reserve, which holds International importance due to its lagoon and qualifying bird assemblage. This assessment provides a robust and proportionate justification for the designation of the area as of local importance, supporting the EclA and Shadow HRA mitigation planning.</p>
	4.2.4 CEMP	<p>The CEMP must incorporate a comprehensive Breeding Bird Method Statement including avoidance through timing or nesting bird checks undertaken by ECoW.</p>	<p>The CEcMP is designed for use by contractors, therefore, it is structured around the construction mitigation measures required at each phase of development rather than organised by ecological receptor, ensuring that the required actions remain clear to follow. The measures set out within the CEcMP include timing of works adjacent to the lagoon to avoid the sensitive breeding season for birds, a pre-commencement check by a Suitably Qualified Ecologist ahead of any scrub clearance within the nesting bird</p>

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			<p>season (March to August, inclusive), a pre-commencement breeding bird survey ahead of any works adjacent to the lagoon, undertaken by a Suitably Qualified Ecologist, to identify late breeding birds in September to consider. In addition, the CEcMP recommends the delivery of a toolbox talk to site personnel, covering key species to be aware of during construction, precautionary phased clearances, precautionary working method statements for each phase, and the actions to be taken should protected species be identified, alongside the use of appropriate fencing and signage. Collectively, these measures provide appropriate protection for breeding birds during construction.</p>
4.3 Wintering birds		<p>The recommended buffer zones detailed in Table 6 are considered appropriate and must be detailed in the CEMP to avoid disturbance.</p>	<p>The CEcMP recommends a blanket restriction on works along the BOAT, including maintenance of the BOAT and sea wall, refurbishment of the existing hide, installation of vehicle-restriction infrastructure (timber fencing and timber/Corten bollards), and reinforcement of the existing slag bund. These activities will be limited to September and October; as such, the recommended buffer zones are not required because works will fall entirely</p>

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			<p>outside sensitive breeding and overwintering periods.</p> <p>Works along the BOAT will therefore only take place in September/October to avoid disturbance to breeding and overwintering bird species. Any works not completed before November will require advice from an ECoW and may need to be postponed until the following September/October (2027). Small-scale, short-duration, low-noise works (e.g., below 70 dBA) may proceed under ECoW supervision, provided they are unlikely to disturb birds associated with the lagoon.</p>
<p>4.4 Natterjack toads, great crested newt and common amphibians</p>	<p>4.4.1 Survey validity</p>	<p>The age of survey data requires a review of validity by a professional Ecologist and a clear statement provided with appropriate justification.</p> <p>Section 2.3 of Phase 2 Addendum Report provides appropriate justification. Monitoring data for NJT /Herps to be provided in the LEMP once available and Amphibian MS to be updated accordingly.</p>	<p>It was confirmed by RSPB in December 2025 that ARC methodology was used for surveying pools and no records of Natterjack Tadpoles or Toadlets were identified during the 2025 surveys and so method statement remains the same.</p>
	<p>4.4.2 Survey methodology</p>	<p>Further justification is required for the survey methods.</p>	<p>The assessment of the value of the nature reserve and Visitor Centre for great crested newts (GCN) has been informed by multiple lines of evidence. A desktop study identified only two records of GCN within 2 km, both</p>

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		<p>Still required for GCN based on the reduced survey effort including evidence to support whether ponds are actually 'brackish.'</p>	<p>from 1980 and 1981. Records from the RSPB reserve, which date from the 1960s, up to 2025, revealed no GCN observations. Amphibian surveys were carried out in 2021 and 2022 as per the methodology in the Phase 2 report (ref: 551959ltJun23FV02_Phase2Surveys) on ponds on site and off-site which did not identify GCN (see map of pond locations attached for ease).</p> <p>Since 2022, the RSPB has been carrying out amphibian surveys, and these results, alongside the 2021–2022 surveys completed by Greengage, have been used to inform a precautionary assessment. Based on these data, the site is considered unlikely to support GCN, despite the presence of habitats that could be considered suitable.</p>
	4.4.3 Impact Assessment	<p>The assessment of the value of the nature reserve and visitor centre for great crested newt requires further justification which takes into consideration that great crested newts are a qualifying feature of Morecambe Bay SAC and there is suitable habitat on site.</p> <p>Section 2.3 of Phase 2 Addendum Report provides appropriate justification for NJT. Further justification for importance assigned</p>	<p>The assessment of the value of the nature reserve and Visitor Centre for great crested newts (GCN) has been informed by multiple lines of evidence. A desktop study identified only two records of GCN within 2 km, both from 1980 and 1981. Records from the RSPB reserve, which date from the 1960s, up to 2025, revealed no GCN observations.</p>

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		<p>to GCN is required with due consideration of the reduced survey effort and evidence of brackish ponds.</p>	<p>Amphibian surveys were carried out in 2021 and 2022 as per the methodology in the Phase 2 report (ref: 551959ltJun23FV02_Phase2Surveys) on ponds on site and off-site which did not identify GCN (see map of pond locations attached for ease).</p> <p>Since 2022, the RSPB has been carrying out amphibian surveys, and these results, alongside the 2021–2022 surveys completed by Greengage, have been used to inform a precautionary assessment. Based on these data, the site is considered unlikely to support GCN, despite the presence of habitats that could be considered suitable. Greengage suggested that the ponds may be brackish as they are on coastal floodplain grazing marsh however Greengage acknowledge that this has not been tested during surveys and so cannot be confirmed. In accordance with the ARC document provided by RSPB from surveys (targeting Natterjack Toads) of the ponds off-site, the surrounding terrestrial vegetation is very suitable for Natterjacks due to high levels of sheep grazing. This reduces suitability for GCN which would require longer grassland for commuting.</p>

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			<p>That being said, given that no GCN have been recorded in other off-site waterbodies between 250-500m from the site, GCN dispersal onto site is considered highly unlikely and the 2022 likely absence status is considered to remain valid. Additionally, Natural England rapid risk assessment tool in relation to GCN impacts, while the development will result in a permanent loss of scrub habitat which is situated within the intermediate zone (c. 100 - 250m) it will be small scale (approximately 0.03ha) and the output concludes that "an offense is highly unlikely".</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.</p> <p><b>An AMS is included in the CEMP which will be secured by planning condition. This must also include further detail on timing, use of licenced ECoW and the process to follow if</b></p>	<p>We state in the AMS that <i>'all vegetation clearance and topsoil stripping should be undertaken between April and mid-October, when overnight temperatures are regularly above 5°C, and to coincide with the active amphibian and reptile season.'</i> This is the temperature where amphibians are noted to emerge from hibernation as per Froglife guidance as well as coincide with the active reptile season which is considered between April and mid-October.</p>

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		<p>GCN is identified during works (or other herps):</p> <p>Excavation and de-vegetation works must avoid the hibernation period (November-March inclusive, or when temperatures fall below 10oC consistently).</p> <p>Any toolbox talks provided to workers should include identification of natterjack toad, great crested newt and common amphibians.</p>	
	4.4.5 Biodiversity / Habitat Enhancements	<p>A detailed Amphibian Management Plan will be incorporation into a LEMP, which includes habitat creation, management and associated wetland creation plans to include water flow / control structures.</p> <p>An AMS is included in the CEMP which will be secured by planning condition. This must also include:</p> <p>Refugia constructed from bricks (or similar), not concrete (as it may alter thermal and humidity levels of the refugia/hibernacula).</p>	<p>New ponds are no longer being considered as part of the scheme. Concrete was identified as a suitable material for hibernacula by the expert we consulted, who noted that previous populations at Millom had been found beneath lumps of slag and concrete. They also advised that sand should be added to hibernacula to improve habitat suitability, and that any new sand piles would need to be created only after scraping back the substrate to reach at least the point of capillary action. The expert emphasised the importance of avoiding locations prone to flooding. These recommendations have been fully incorporated into the design, addressing the absence of detailed hibernacula creation</p>

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		<p>Habitat creation, management and associated wetland creation plans to include water flow / control structures.</p> <p>Details of new ponds.</p> <p>Management and maintenance measures as agreed between RSPB and Cumberland Council.</p> <p>How management will be secured, such as scrub management.</p>	<p>guidance within the standard handbook. RSPB have recently confirmed that they will be continuing the management of the hibernacula.</p>
4.5 Invertebrates	4.5.2 Mitigation and enhancement	<p>The proposed enhancements / mitigation must be detailed within the CEMP and LEMP and must include number and locations of log piles and other invertebrate features proposed as enhancements.</p>	<p>RSPB advised against the use of log piles, as they can support species that compete with natterjack toads such as common toads. A map has been provided in the LEMP which details the locations of invertebrate features.</p>
4.6 Reptiles	4.6.1 Survey Validity	<p>Survey documents require a review of validity by a professional Ecologist and a clear statement provided with appropriate justification.</p> <p>Section 2.3 of Phase 2 Addendum Report provides appropriate justification.</p>	Noted
	4.6.3 Mitigation measures	<p>A reptile method statement for both the wider site and proposed visitors centre must be included within the CEMP, which includes toolbox talk (with identification of common lizard and slow worm), mitigation for impacts such as habitat loss and timing of works.</p>	<p>The CEcMP is designed for use by contractors, therefore, it is structured around the construction mitigation measures required at each phase of development rather than organised by ecological receptor, ensuring that the required actions remain clear to follow. The measures set out within</p>

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			<p>the CEcMP include timing of scrub clearance to avoid the hibernation season for reptiles, all scrub clearance undertaken in a phased manner in the presence of an ECoW. In addition, the CEcMP recommends the delivery of a toolbox talk to site personnel, covering key species to be aware of during construction, precautionary working method statements for each phase, and the actions to be taken should protected species be identified, alongside the use of appropriate fencing and signage. Collectively, these measures provide appropriate protection for reptiles during construction.</p> <p>RSPB advised against the use of log piles and the previous hibernacula proposed, as they can support species that compete with natterjack toads such as common toads. The scheme is providing bespoke hibernacula however these will be created and designed to target natterjack toads specifically.</p>
	4.6.4 Biodiversity / habitat enhancements	The number and locations of log piles and other reptile features, such as hibernacula proposed as enhancements should be quantified within the CEMP.	As above.

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4.7 Bats	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 buffer), that will be affected by the works.</p> <p>Section 5.1 clarifies no trees with suitability in the visitor centre area.</p>	Noted
	4.7.3 Bats and buildings	<p>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> <p>Still required.</p>	<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 cracks and crevices and is extremely exposed. The windmill is considered well-mortared between the stones, providing limited cracks or crevices. It is highly exposed on a high coastal point, further reducing its suitability for roosting bats. The structure had partially collapsed and had no roof, and the stone walls, both internally and externally, are largely well-pointed with very few accessible crevices.</p> <p>Given its exposure, lack of roof, and limited crevices, the windmill provides sub-optimal roosting conditions for bats during both summer and winter. The structure is</p>

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			<p>therefore not suitable for hibernation or summer roosting in accordance with standard guidance.</p> <p><i>Figure 1 Photo of windmill</i></p> 
4.8 Badger	4.8.3 Impact assessment	A walkover of the site to check for badger signs must be undertaken up to 3 months before works commence and all works to the dense scrub areas undertaken under ECoW supervision as stated in the CEMP.	As detailed within the CEMP.

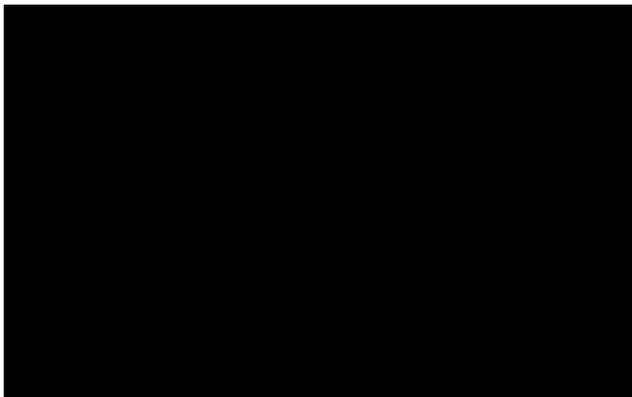
Document	Element	Action(s) required	Greengage Response
	4.8.4 CEMP	A detailed Badger Method Statement is required in the CEMP, including: a toolbox talk to contractors on identifying badger signs and reasonable avoidance measures; and the dense scrub will be removed under ECoW and using a two phased cut.	The CEcMP is designed for use by contractors, therefore, it is structured around the construction mitigation measures required at each phase of development rather than organised by ecological receptor, ensuring that the required actions remain clear to follow. The measures set out within the CEcMP include a pre-commencement site walkover and checks ahead of each construction phase, undertaken by a Suitably Qualified Ecologist, to identify mammal holes that may require further monitoring. In addition, the CEcMP recommends the delivery of a toolbox talk to site personnel, covering key species to be aware of during construction, precautionary phased clearances, precautionary working method statements for each phase, and the actions to be taken should protected species be identified, alongside the use of appropriate fencing and signage. Collectively, these measures provide appropriate protection for badgers during construction.
4.9 Riparian Mammals	4.6.1 Survey Validity	Survey data require a review of validity by a professional Ecologist and a clear statement provided with appropriate justification.	Noted

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		<p>This has been provided and is considered acceptable.</p>	
	4.9.2 Limitations	<p>Further species-specific survey for otters following best practice methods (with associated impact assessment and mitigation requirements) is recommended or further justification is needed to explain why these have not been carried out.</p> <p>This has been provided and is considered acceptable.</p>	Noted
	4.9.3 Results	<p>While dogs can be a deterrent to otters in some areas, more justification is needed as to why updated otter surveys have not been completed despite the suitability of the site and best practice guidance.</p> <p>Further justification provided is considered acceptable.</p>	Noted
	4.9.4 Mitigation	<p>A detailed Otter Method Statement should be included within the CEMP which includes the following:</p> <ul style="list-style-type: none"> <li>• Pre-commencement surveys for otters (adopting best practice guidance) are</li> </ul>	<p>The CEcMP is designed for use by contractors, therefore, it is structured around the construction mitigation measures required at each phase of development rather than organised by ecological receptor, ensuring that the required actions remain clear to follow. There will be a pre-</p>

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		<p>required within 12 months or sooner of any construction phase works;</p> <ul style="list-style-type: none"> <li>• Toolbox talks for all contractors are delivered prior to works;</li> <li>• ECoW supervision during habitat clearance.</li> </ul> <p>The above can be secured by condition as part of the CEMP.</p>	<p>commencement survey, toolbox talks, ECoW supervision during habitat clearance. The measures set out within the CEcMP include a pre-commencement site walkover and checks ahead of each construction phase, undertaken by a Suitably Qualified Ecologist. In addition, the CEcMP recommends the delivery of a toolbox talk to site personnel, covering key species to be aware of during construction, precautionary phased clearances, precautionary working method statements for each phase, and the actions to be taken should protected species be identified, alongside the use of appropriate fencing and signage. Collectively, these measures provide appropriate protection for otter during construction.</p>
Other	5.1 Local and further non-statutory' sites	<p>An assessment of potential impacts on Local and further non-statutory' sites is required. Outstanding.</p> <p>It should be noted that any works within a SSSI will require Natural England (NE) assent, in addition to HRA adoption by LPA and NE</p>	<p>Greengage considers that where potential impacts have been assessed and mitigated for statutory sites immediately adjacent to the development, this also provides mitigation for non-statutory sites located further afield. The development provides access to alternative greenspace than the non-statutory sites and does not increase the population of residents. It is noted that any works affecting SSSIs will require Natural England (NE) assent, in</p>

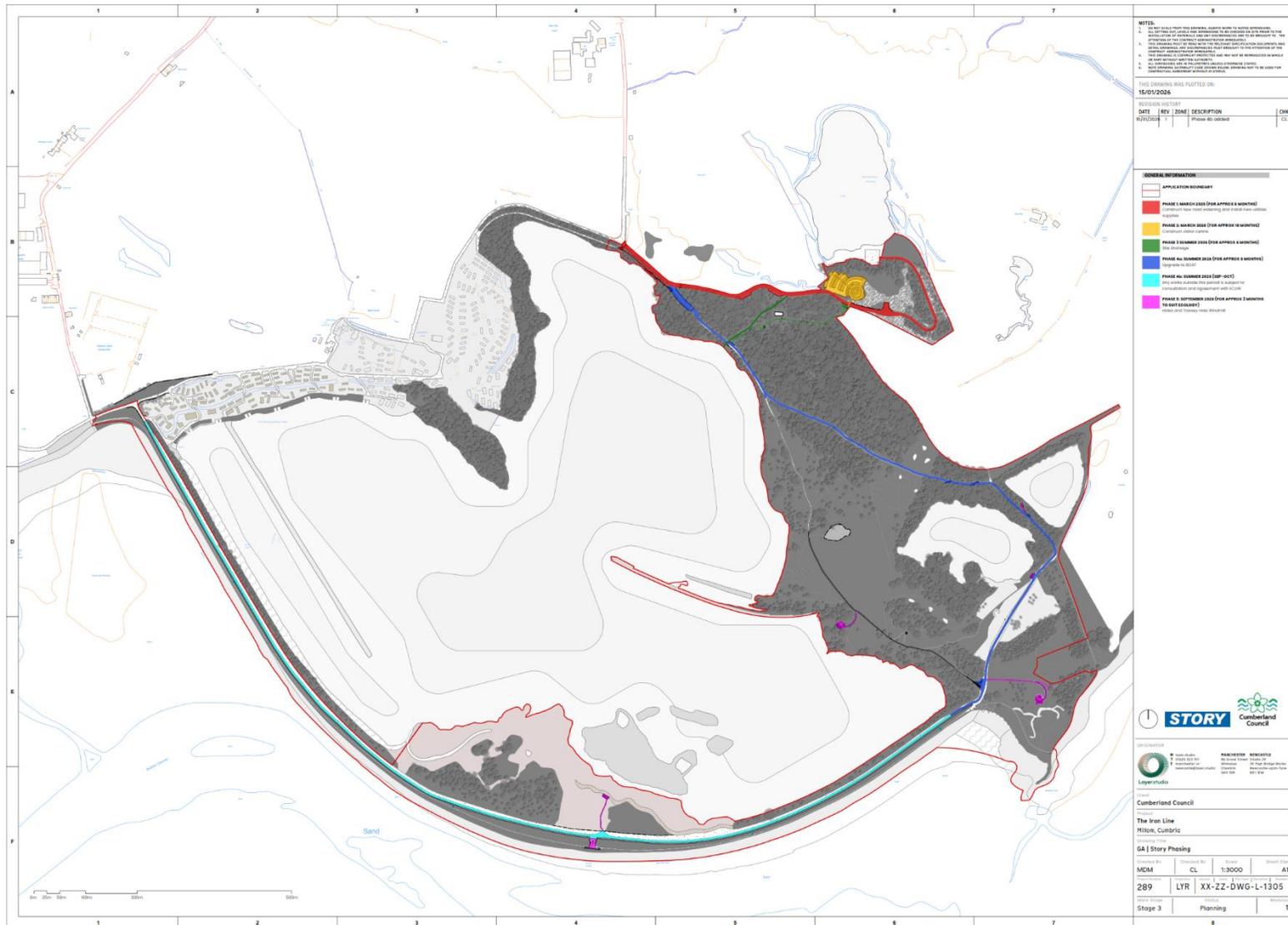
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			addition to HRA adoption by both the Local Planning Authority and NE.
	5.2 Red Squirrel	Justification is needed as to why red squirrel has not been scoped into the ecological assessment of this site.  <b>This has been provided and is considered acceptable.</b>	Noted
	5.3.1 INNS	A detailed INNS & biosecurity method statement is required in the CEMP to limit the introduction or spread of INNS onto site.  <b>This has been provided and is considered acceptable.</b>	Noted
	5.3.2 General comments on CEMP	The nomination of a Biodiversity champion (or synonymous title) is to be included in the CEMP.	Provided in the CEcMP.

Yours sincerely



**For and on behalf of Greengage Environmental Ltd**

# APPENDIX A MASTERPLAN AND ASSOCIATED PROGRAM /SCHEDULE



**NOTES**

1. ALL PHASES FROM THIS PROGRAM, SUBJECT TO THE FOLLOWING CONDITIONS:
2. ALL PHASES SHALL BE DEVELOPED IN ACCORDANCE WITH THE MASTERPLAN AND ASSOCIATED PROGRAM /SCHEDULE.
3. THE PHASES SHALL BE DEVELOPED IN ACCORDANCE WITH THE MASTERPLAN AND ASSOCIATED PROGRAM /SCHEDULE.
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THIS DRAWING WAS PLOTTED ON:  
15/01/2024

REVISION NO	DATE	REV. NO	DESCRIPTION	CHK
1	15/01/2024	1	Phase 6 added	CL

**GENERAL INFORMATION**

- APPLICATION BOUNDARY
- PHASE 1 MARCH 2024 (FOR APPROX 6 MONTHS)  
Commercial new retail building and initial new urban village
- PHASE 2 MARCH 2024 (FOR APPROX 6 MONTHS)  
Commercial new urban village
- PHASE 3 SUMMER 2024 (FOR APPROX 6 MONTHS)  
New residential
- PHASE 4 SUMMER 2024 (FOR APPROX 6 MONTHS)  
New residential
- PHASE 5 SUMMER 2024 (FOR APPROX 6 MONTHS)  
New residential
- PHASE 6 SEPTEMBER 2024 (FOR APPROX 6 MONTHS TO 18 OCTOBER 2024)  
New and existing new residential

**STORY** Cumberland Council

**LayerStudio**

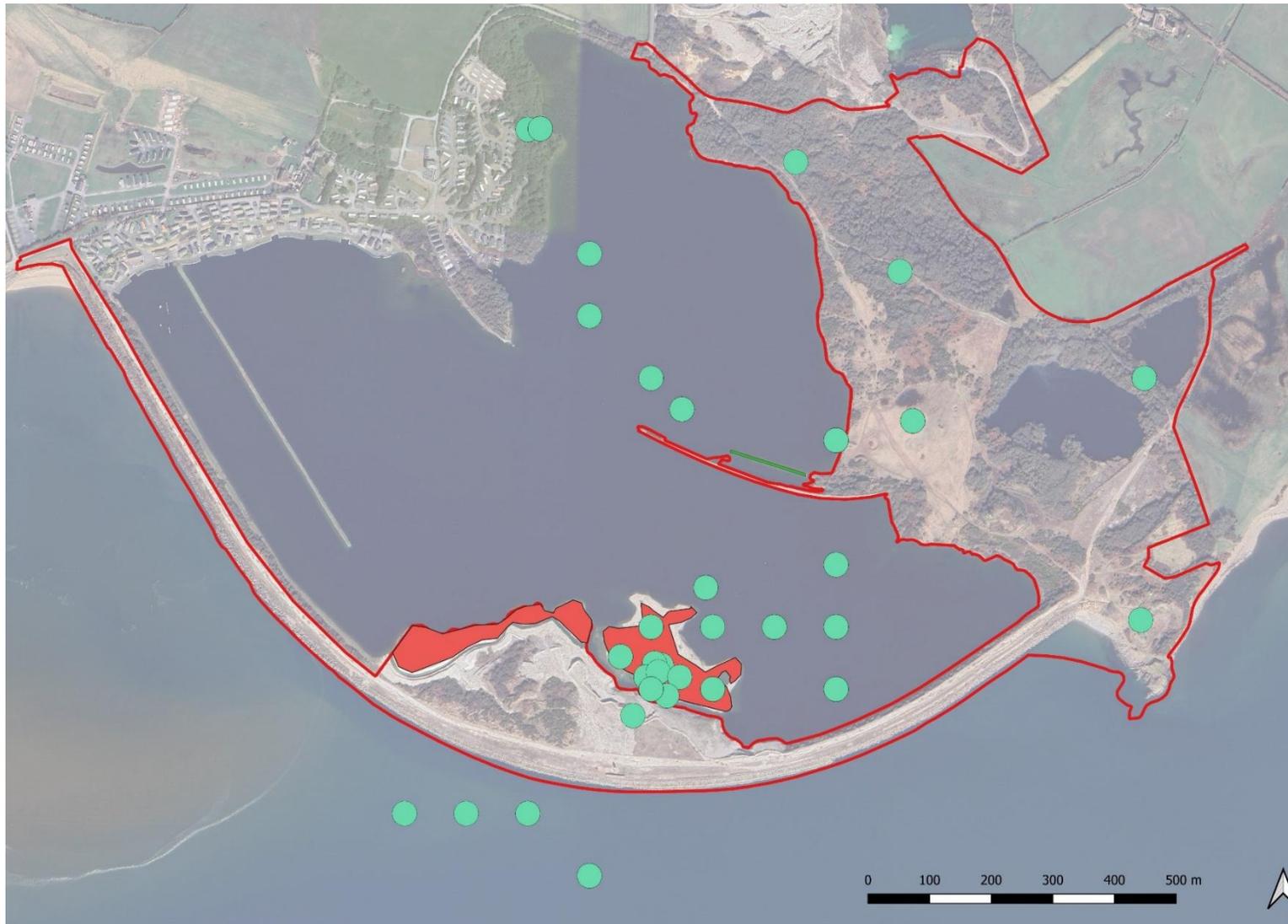
**Cumberland Council**

**The Iron Line**  
Milton, Cumbria

**GA | Story Phasing**

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APPENDIX B RSPB MAP OF THE BREEDING BIRD LOCATIONS



- ◊ Avocet
- Bar-headed Goose
- Bar-tailed Godwit
- Barn Owl
- Barnacle Goose
- ◊ Black Swan
- Black Tern
- Black-headed Gull
- ◊ Black-tailed Godwit
- ◊ Black-throated Diver
- Canada Goose
- Cattle Egret
- ◊ Common Gull
- ◊ Common Sandpiper
- ◊ Common Scoter
- ◊ Common Tern
- ◊ Coot
- Cormorant
- ◊ Cuckoo
- ◊ Curlew
- ◊ Curlew Sandpiper
- ◊ Dunlin
- ◊ Elder
- ◊ Elder
- ◊ Godwall
- Garganey
- ◊ Golden Plover
- ◊ Goldeneye
- ◊ Goosander
- ◊ Great Black-backed Gull
- ◊ Great Crested Grebe
- ◊ Great Northern Diver
- ◊ Greenshank
- ◊ Grey Heron
- ◊ Greylag Goose
- ◊ Herring Gull
- ◊ Kestrel
- ◊ Kingfisher
- ◊ Kittiwake
- ◊ Knot
- ◊ Lapwing
- ◊ Lesser Black-backed Gull
- ◊ Lesser Scaup
- Linnet
- ◊ Little Egret
- Little Grebe
- ◊ Little Gull
- Little Ringed Plover
- Little Stint
- ◊ Little Tern
- ◊ Long-tailed Duck
- ◊ Mallard
- Marsh Harrier
- ◊ Mediterranean Gull
- Merlin
- ◊ Moorhen
- ◊ Mute Swan
- ◊ Osprey
- ◊ Oystercatcher
- ◊ Pectoral Sandpiper
- Peregrine
- ◊ Pink-footed Goose
- ◊ Pintail
- Pochard
- ◊ Pomarine Skua
- Red-breasted Merganser
- ◊ Red-throated Diver
- Redshank
- ◊ Ringed Plover
- Rock Pigeon
- ◊ Roseate Tern
- Ruff
- Sand Martin
- ◊ Sanderling
- ◊ Sandwich Tern
- Scaup
- ◊ Shelduck
- ◊ Shoveler
- Skylark
- Slavonian Grebe
- ◊ Snipe
- ◊ Sparrowhawk
- Spoonbill
- ◊ Spotted Redshank
- ◊ Starlings
- ◊ Teal
- ◊ Tufted Duck
- ◊ Turnstone
- ◊ Twite
- ◊ Wheatear
- Whimbrel
- ◊ White Wagtail
- ◊ Whooper Swan
- Wigeon

APPENDIX C MAPS OF PONDS SURVEYED

