



envirotech

Ecological Consultants

Environmental and Rural Chartered Surveyors

Your Ref: -
Our Ref: 9977

Angus Hutchinson
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2 September 2026

Dear Angus

**RE: MILLOM IRON LINE - MAINSGATE ROAD FOUL DRAINAGE LINK
NATTERJACK TOAD PRECAUTIONARY METHOD STATEMENT AND ECOLOGICAL RISK
ASSESSMENT**

I have reviewed the supplied aerial image, site photograph and Curtins drawing MIL-CUR-RMG-00-DR-C-5241 P01. The proposal is to amend the alignment of the foul drainage link at Mainsgate Road. Approximately 4 m lies outside the route already consented under application 4/25/2198/0F1 and outside the highway authority's jurisdiction, requiring a separate planning application.

The application section is confined to existing tarmac road/hardstanding that is regularly crossed by vehicles. It contains no breeding, foraging, sheltering or hibernation habitat for natterjack toad. Although natterjack toads occur in very low numbers within the wider reserve, the chance of one entering this small work area is considered very low.

Subject to the enclosed precautionary working method - particularly the same-day excavation and backfilling, trench checks and stop-work procedure - the residual construction risk is low and the ecological effect is assessed as negligible.

Yours sincerely

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Director, Envirotech NW Ltd

Enc: Precautionary Method Statement and Ecological Risk Assessment



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Registered in England and Wales. Company Registration Number 5028111

Natterjack Toad Precautionary Method Statement

Millom Iron Line - Mainsgate Road foul drainage link | Envirotech ref. 9977 | 2 September 2026

1. Scope and proposal

This document applies only to the approximately 4 m section of amended drainage alignment at the Mainsgate Road/access-road junction shown within the red application boundary on Curtins drawing MIL-CUR-RMG-00-DR-C-5241 P01. It does not assess the remainder of the consented drainage route.

The works comprise localised saw-cutting and excavation of the existing tarmac road/hardstanding, installation of the foul drainage pipe, backfilling and permanent reinstatement. No vegetation clearance or works within adjacent reserve habitat are proposed.

2. Ecological context and assessment

Natterjack toad *Epidalea calamita* occurs in the wider reserve, but the local population is understood to be present only in very low numbers. The application footprint itself is tarmac road/hardstanding subject to regular vehicle movement. It contains no pond, bare sand, short open vegetation, burrowing substrate or ground-level refuges and is unsuitable as breeding or terrestrial habitat.

The only credible construction pathway is the chance movement of an individual from the wider landscape onto the carriageway or into an open trench. No loss or fragmentation of natterjack habitat and no change to breeding ponds or supporting hydrology is anticipated from this short realignment.

Conclusion: The likelihood of an individual being present is very low. With the precautions below, the residual risk of killing, injury, trapping or disturbance is low and the ecological effect of the approximately 4 m amendment is negligible.

3. Legal context

Natterjack toad is a European protected species under the Conservation of Habitats and Species Regulations 2017 and is also protected by the Wildlife and Countryside Act 1981. Relevant offences include deliberate killing, injury, capture or disturbance and damage or destruction of a breeding site or resting place.

On the information supplied, and provided the works remain confined to hardstanding and this method is followed, an EPS mitigation licence is not considered necessary for this small amendment. If a natterjack toad is found, or the footprint/method changes, work must stop and the position must be reviewed by the consultant ecologist before works resume.

4. Precautionary working method

1. **Before work starts.** The site manager shall hold this document on site, mark the approximately 4 m work boundary and brief every operative on natterjack identification, legal protection, the trench controls and the stop-work procedure. The briefing shall be recorded.
2. **Pre-start check.** At the start of each shift, a competent person shall visually inspect the tarmac footprint, kerb edges and any loose materials. If any amphibian cannot confidently be identified as a common species, it must be treated as a potential natterjack toad and the stop-work procedure followed.
3. **Confine the footprint.** Plant, storage, arisings and personnel shall remain on the existing tarmac/hardstanding. No tracking, parking, storage or vegetation clearance shall occur within the adjacent verge or reserve habitat.
4. **Excavate sequentially.** Saw-cut and excavate only the short length that can be piped, checked and backfilled during the same working day. Work shall be undertaken in daylight.
5. **Prevent entrapment.** Inspect the open trench regularly, after any break in activity and immediately before pipe placement or backfilling. The trench shall not be left open overnight. If an unforeseen emergency prevents same-day closure, it shall be securely plated or covered and fitted with a rough-surfaced escape ramp, then checked at first light.
6. **Manage materials.** Place excavated material in a vehicle or on sheeting on the hardstanding and remove it promptly. Store pipes and other materials tidily on hardstanding; check beneath any item before it is moved.
7. **Pollution prevention.** Keep a spill kit available; use drip trays; refuel away from the sensitive edge; prevent silt, fuel, concrete washout or waste entering adjacent habitat or drainage features; and remove all waste after completion.
8. **Completion.** Carry out a final trench inspection immediately before backfilling, record the check, permanently reinstate the tarmac and remove all temporary materials. The site manager shall confirm that the footprint has not extended into adjacent habitat.

5. Stop-work procedure if a natterjack toad is found

- Stop excavation, vehicle movement and backfilling immediately in the vicinity of the animal.
- Do not capture, handle or move the animal. Prevent machinery or personnel approaching it while leaving it a safe means of escape.
- Contact Envirotech NW Ltd immediately on 015395 61894 and provide the exact location and, if it can be obtained without disturbance, a photograph.
- Resume work only when the consultant ecologist confirms that it is lawful and safe. Additional measures or licensing may be required.

6. Ecological risk assessment

This is an ecological risk assessment and does not replace the contractor's construction health and safety risk assessment or traffic-management plan.

Ecological hazard / pathway	Initial risk	Required controls	Residual risk
Natterjack toad present on the carriageway or at the edge of the work area before excavation; potential injury by plant or traffic.	L1 x C4 = 4 LOW	Daylight pre-start inspection of the approximately 4 m work area, kerb lines and any loose materials. Brief all operatives; keep all plant within the marked hardstanding footprint.	L1 x C4 = 4 LOW
A toad enters an open trench and becomes trapped, crushed during backfilling or exposed to desiccation/predation.	L2 x C4 = 8 MEDIUM	Excavate only the length that can be completed that day. Inspect the trench regularly and immediately before backfilling. Do not leave it open overnight. If an unforeseen delay occurs, securely plate/cover it and provide a rough escape ramp before the site is left.	L1 x C4 = 4 LOW
A toad shelters beneath pipes, plates, spoil or other materials and is injured when they are moved.	L2 x C4 = 8 MEDIUM	Keep pipes and materials raised or neatly stored on existing hardstanding, away from vegetation. Remove spoil promptly. Check beneath any item left in place before it is lifted or moved.	L1 x C4 = 4 LOW
Plant, spoil or personnel encroach into adjacent vegetated habitat, causing habitat damage or direct injury.	L2 x C3 = 6 MEDIUM	Clearly mark the working limit. No vegetation clearance, storage, tracking or parking outside the tarmac/hardstanding footprint. Any change to the footprint requires ecological review before work continues.	L1 x C3 = 3 LOW
Fuel, oil, wet concrete, silt or waste reaches adjacent habitat or drainage features.	L2 x C3 = 6 MEDIUM	Use drip trays and spill kits; refuel away from the sensitive edge; contain arisings; prevent silty runoff; remove waste at the end of each shift. Stop and contain any spill immediately.	L1 x C3 = 3 LOW
Night working or unnecessary lighting increases the chance of encountering active toads and extends disturbance.	L1 x C3 = 3 LOW	Complete excavation, pipe installation and backfilling in daylight. No routine night working within the application section. If emergency night work is unavoidable, obtain ecological advice and inspect the footprint immediately beforehand.	L1 x C2 = 2 LOW

Risk scoring: likelihood (L) and consequence (C) are each scored 1-5; score = L x C. 1-4 Low, 5-9 Medium, 10-16 High and 17-25 Very High.

7. Responsibilities and review

The principal contractor/site manager is responsible for implementing the method, briefing operatives and retaining the trench-check record. Envirotech NW Ltd shall provide ecological advice if an amphibian is encountered or the scope changes. This document shall be reviewed if works extend beyond the hardstanding, night working is proposed, adjacent vegetation is affected or new natterjack information becomes available.

8. Assessment basis

The assessment is based on the supplied aerial image, site photograph, Curtins drawing MIL-CUR-RMG-00-DR-C-5241 P01 dated 24 August 2026, and the information supplied regarding the wider natterjack population. It is a proportionate assessment of the short hardstanding-only amendment and is not a population survey.

Reference: Natural England (updated 7 April 2025), Natterjack toads: advice for making planning decisions, GOV.UK.

Appendix 1 - Site photographs



Figure 1. Aerial view of the Mainsgate Road/access-road junction and wider setting. Source: Google Earth imagery supplied for the assessment.



Figure 2. View of the affected junction, showing the tarmac carriageway and hardstanding within the application section. Source: Google Earth image supplied for the assessment.

