

30 October 2012

Our ref: 65567

Your ref: UK1817910



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BY EMAIL ONLY

Dear Vicky

Bradford Waste Management DPD: Appropriate Assessment

Thank you for your consultation dated 24 September 2012, which we received on the same date. Thank you for your patience in awaiting a response.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We make the following comments in response to the questions you raise:

1. *Do you agree with the precautionary approach we have taken with regards to thresholds?*

The precautionary approach is embedded in the Habitats Directive and Regulations. We agree with following such a course. Since the impact from acidification is at a maximum 2% of the critical load and the PEC is at more than 70% of the critical load we agree with the conclusion that a significant effect cannot be ruled out.

2. *Have we made correct assumptions about the habitats/vegetation present on this part of the South Pennine Moors SPA/SAC? i.e. Rombalds Moor.*

The assumptions appear broadly reasonable. My land management colleagues list the following habitat types for South Pennine Moors SSSI: (1) Raised and blanket bogs (2) valley mires, poor fens and transition mires and (3) dry heaths. They do not mention any woodland habitats.

3. *Do you have any information about the habitats that are present on this part of the South Pennine Moors SPA/SAC? (Rombalds Moor).*

If you have not done so already, land management colleagues recommend reference to our both our website¹ and the JNCC website² for habitat descriptions for South Pennine Moors.

4. *Is there any evidence to suggest that vegetation on Romabalds Moor is currently affected by acid deposition, as the background acid deposition would suggest should be the case?*

¹ <http://jncc.defra.gov.uk/page-2>

² <http://www.naturalengland.org.uk/ourwork/conservation/designations/sssi/default.aspx>

Land management colleagues advise that we have no direct evidence to prove the effect of acid deposition on the habitats of the South Pennine Moors SSSI.

However, there is strongly suspected correlation between the high acid deposition in the substrates and the species poor variants of the habitats found within the designated area.

5. *How significant do you consider the effect identified to be?*

This is a difficult question to answer. The addition from the waste facility is relatively small but would not be welcome given that acid deposition is already so far in excess of the critical load. The aim should be for an incremental reduction in acid deposition to below the critical load rather than potentially exacerbating an unsatisfactory situation.

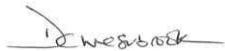
6. *Is the methodology employed appropriate or would you suggest that any further work was required in order for the AA to reach a conclusion for the Waste Management DPD?*

We would be pleased to take more advice from air quality specialist colleagues on this matter. They have advised that the APIS Critical Load Function tool is the correct methodology to have employed for acid deposition.

We support the comments of the Environment Agency with regard to use of site relevant critical loads and factoring terrain into the modelling. You may wish to consider running the model to take these matters into account.

We hope the above is of assistance. For any queries relating to this consultation only you are welcome to contact me directly - telephone: 0300 060 2010 or email: david.westbrook@naturalengland.org.uk. For all other consultations and correspondence, please contact the above address.

Yours sincerely



David Westbrook
Land Use Operations