

Date: 10 February 2023  
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**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Mrs Hart, Mr Rendell,

**Planning consultation: Construction of an energy recovery facility with ancillary buildings and works including administrative facilities, gatehouse and weighbridge, parking and circulation areas, cable routes to ship berths and existing off-site electrical sub-station, with site access through Portland Port from Castletown**

**Location: Portland Port, Castletown, Portland DT5 1PP**

**Air Pollution Critical Levels and Loads to be used along the A354 in considering road traffic impacts**

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.

I am writing to the authority to confirm the advice of Natural England concerning the appropriate Critical Load and Level to be used for the SAC habitat comprising Perennial Vegetation of Stoney Banks at Chesil and the Fleet SAC.

This advice specifically concerns the vegetation communities present along the roadside at the A354 up to a distance of 200m ( the agreed zone of influence for air pollution from road traffic).

Recent updates to the APIS system have provided a higher 1km resolution for modelled air pollutants compared to the previous 5km grid and updated data has recently been made available since the applicants dHRA was submitted.

Natural England has now reviewed a number of sources of evidence including the APIS system and various detailed habitat surveys of the area concerned. The approach has been confirmed with internal specialists.

These sources confirm that it is appropriate to reach a conclusion that the Critical Level for **ammonia** of  $3\mu\text{g}/\text{m}^3$  is suitable.

Further consideration has been given to the appropriate lower Critical Load (CLo) value for Nitrogen deposition which is currently given as 8kg/ha/year on APIS and in Natural England's Supplementary Advice for the SAC.

In the light of evidence from the plant species present within the zone influenced around the A354 road, Natural England advises that the thin soil substrates present support a range of plants consistent with calcareous conditions and so a lower CLo value for **Nitrogen deposition** of 10 kg/ha/year is suitable.

Natural England and the Councils advisor have agreed that the particular physical factors and configuration of the Chesil and the Fleet SAC, when considered with the low vegetation height indicate that for Nitrogen deposition the appropriate APIS background value should be the grid average rather than that for moorland. The use of this value also provides a degree of precaution concerning additional air pollution sources. At the A 354 the background values range from 7.2 to 7.8 kg/ha/year.

Along the 28km length of the SAC there are 34 1km grid squares with APIS data with a range of N deposition values from 7.2 to 8.6 kg/ha/year grid average (an overall average of 7.9 kg/ha/year).

Natural England will be updating its published Supplementary Advice to reflect the revised lower Critical Load for Nitrogen deposition in due course.

I trust this advice will assist the authority in carrying out its Appropriate Assessment for the above application.

Yours sincerely

Nick Squirrell  
Conservation and Planning Lead Advisor  
Dorset Team  
Wessex Area Team  
Natural England

