



Exmoor National Park Authority

Exmoor Air Quality Management Strategy to reduce impacts on designated wildlife sites

Invitation to Quote

1. Introduction

- 1.1. Exmoor is one of 10 National Parks in England, its purposes set out in the Environment Act 1995 are to:
 - Conserve and enhance the natural beauty, wildlife and cultural heritage
 - Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public
- 1.2. When National Parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks.
- 1.3. Exmoor National Park has two Special Areas of Conservation - Exmoor Heaths SAC and Exmoor & Quantock Oakwoods SAC. The SACs are currently exceeding the thresholds for nitrogen and ammonia, and air quality is considered a limiting factor for these protected sites on Exmoor. The issues of air pollution are also of concern more widely for other protected sites including Sites of Special Scientific Interest.
- 1.4. The impact of air pollution on the conservation status of the SACs is of concern in light of the obligations to secure favourable status for the sites. It is also impacting on planning applications for new or expanded livestock barns and slurry storage, which cannot be permitted as the SACs already exceed the air quality thresholds and there will be potential for an increase in pollutants.
- 1.5. The Authority wishes to commission consultants to investigate the causes of air pollution and impacts on the SACs, and to produce an air quality management strategy for Exmoor's SACs to address these issues.

2. The purpose and scope of the commission

- 2.1. The purpose of this commission is to develop a strategy to manage the impact of atmospheric pollution from farming and other land management activities on the designated SAC and SSSI sites on Exmoor. This is to establish a pathway for the landowners and farming community to collectively manage this impact and give Natural England confidence that impact is being reduced as far as reasonably practical.
- 2.2. The approach should include:
 - Interrogating the APIS model ([APIS app | Air Pollution Information System](#)) to better understand the data behind the air quality exceedances. This should include analysis of local monitoring stations and where the data is coming from to explain how the thresholds have been exceeded
 - Clearly setting out the sources, local and long range (and relative scale) of pollutants
 - Examining how the thresholds for the designated sites are set
 - Investigating the scale and operations of farming systems in the affected areas on Exmoor
 - Investigating potential contributions from farms and other sources outside the National Park
 - Investigating other sources of pollutants including game shoots
 - Engaging with partners and land managers to consider their views on the causes and potential solutions
 - Provide a short summary of the current legislation, policy drivers and initiatives
 - Developing a strategy and pathway (including mitigation methods) to reduce air quality to below the SAC thresholds, and identify measures to avoid, reduce and mitigate future sources of air pollution to avoid future impacts on the SACs and SSSIs

3. Background

- 3.1. In accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), Local Planning Authorities must ensure that there will be no Likely Significant Effect on Natura 2000 sites (SAC, SPA and Ramsar) as a result of proposals, before granting approval for planning applications. This is usually undertaken by undertaking a Habitats Regulations Assessment (HRA) Screening which takes into account the impacts of the proposal 'alone' and 'in-combination', in the absence of mitigation. Where Likely Significant Effects cannot be ruled out the Competent Authority (in this case, ENPA) must undertake an Appropriate Assessment (AA) of the likely effects of the plan or proposal to ensure that there will be no adverse effects on the integrity of the site. Mitigation measures can be considered at AA stage.
- 3.2. Exmoor National Park has two Special Areas of Conservation (SACs) – Exmoor Heaths SAC and Exmoor & Quantock Oakwoods SAC and 14 Sites of Special Scientific Interest (SSSI). Air quality is considered a limiting factor for protected sites on Exmoor. Atmospheric pollution and the impact of

atmospheric nitrogen deposition is the first priority identified as a pressure on wet heath, dry heath, blanket bogs and oak woodland habitats within the [Site Improvement Plan](#) for Exmoor Heaths SAC, highlighting the importance of its consideration. It is also identified as a threat that needs further investigation within the [Site Improvement Plan](#) for Exmoor & Quantock Oakwoods SAC, which supports outstanding communities of lichens and lower plants within our temperate rainforests.

- 3.3. The main pollutants of concern affecting Exmoor’s SACs are ammonia and nitrogen. Ammonia is directly toxic to vegetation and especially to lower plants (mosses, liverworts and lichens) and is also a major contributor to the deposition of nitrogen, which reduces habitat biodiversity by promoting the growth of a relatively small number of the more vigorous plant species which then out-compete the other species present. Excess ammonia emissions and nitrogen deposition are therefore particularly detrimental to our moorland SAC/SSSIs where mosses such as sphagnum can be directly affected and woodland SAC/SSSIs which are characterised by bryophyte epiphytes.
- 3.4. There is a long history of small scale traditional farming on Exmoor, these farms provide both economic, cultural, landscape and biodiversity value to the National Park, as well as (in some instances) looking after livestock which are essential to ongoing management of the designated sites.

Table 1: Summary of APIS baseline data for Exmoor Heaths SAC

Qualifying feature	Nutrient Nitrogen deposition kgN/ha/yr	NH3 µg/m ³	NOx µg/m ³
Alkaline fens	Critical Load = 15 – 25 Baseline = 10.3 – 17.3	Critical Level = 1 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0
Blanket bogs	Critical Load = 5 – 15 Baseline = 10.3 – 17.3	Critical Level = 1 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0
European dry heaths	Critical Load = 5 – 15 Baseline = 10.3 – 17.3	Critical Level = 1 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0
Northern Atlantic wet heaths with <i>Erica tetralix</i>	Critical Load = 5 – 15 Baseline = 10.3 – 17.3	Critical Level = 1 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0
Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles	Critical Load = 10 – 15 Baseline = 16.3 – 26.0	Critical Level = 1 or 3 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0

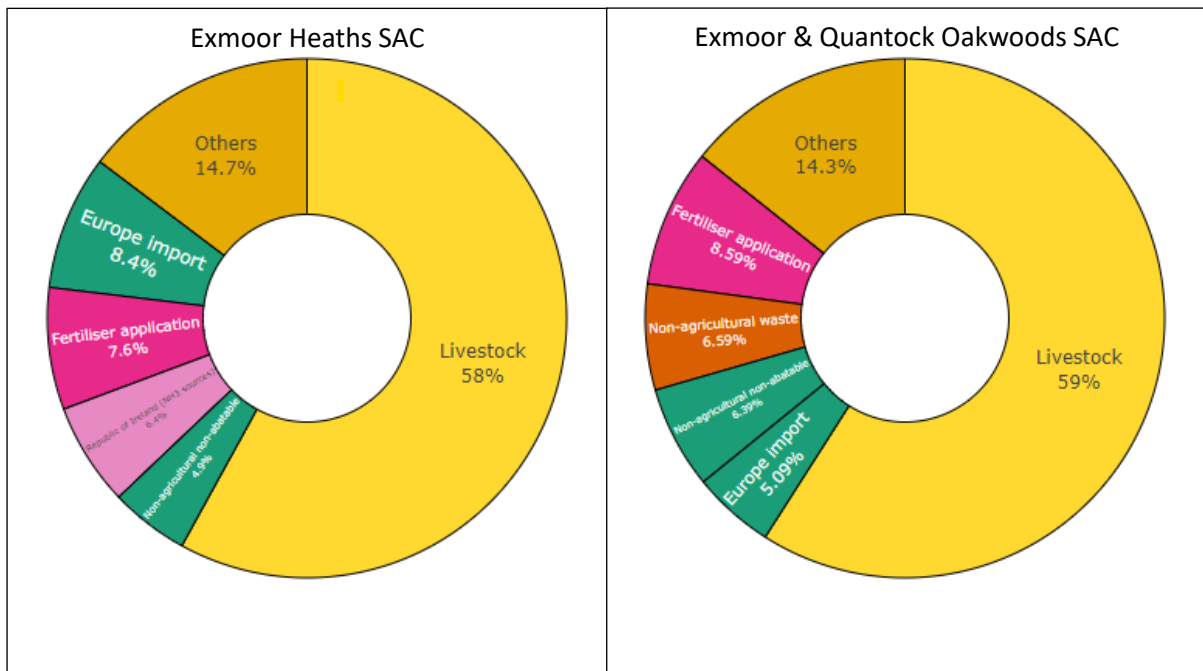
Transition mires and quaking bogs	Critical Load = 5 – 15 Baseline = 10.3 – 17.3	Critical Level = 1 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0
Vegetated sea cliffs of the Atlantic and Baltic Coasts	Critical Load = none provided Baseline = 10.3 – 17.3	Critical Level = 1 or 3 Baseline = 0.7 – 1.4	Critical Level = 30 Baseline = 3.6 – 6.0

Table 2: Summary of APIS baseline data for Exmoor Heaths SAC

Qualifying feature	Nutrient Nitrogen deposition kgN/ha/yr	NH3 µg/m ³	NOx µg/m ³
Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i>	Not sensitive	Critical Level = 1 Baseline = 0.8 – 1.4	Not sensitive
Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes <i>Taxus</i> in the shrub layer	Critical Load = 10 – 15 Baseline = 17.4 - 23.7	Critical Level = 1 or 3 Baseline = 0.8 – 1.4	Critical Level = 30 Baseline = 3.8 – 5.0
European dry heaths	Critical Load = 5 – 15 Baseline = 11.2 – 15.6	Critical Level = 1 Baseline = 0.8 – 1.4	Critical Level = 30 Baseline = 3.8 – 5.0
Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles	Critical Load = 10 – 15 Baseline = 17.4 - 23.7	Critical Level = 1 or 3 Baseline = 0.8 – 1.4	Critical Level = 30 Baseline = 3.8 – 5.0
<i>Barbastella barbastellus</i> (broadleaved deciduous woodland)	Critical Load = 10 – 15 Baseline = 17.4 - 23.7	Critical Level = 3 Baseline = 0.8 – 1.4	Critical Level = 30 Baseline = 3.8 – 5.0
<i>Myotis bechsteini</i> (broadleaved deciduous woodland)	Critical Load = 10 – 15 Baseline = 17.4 - 23.7	Critical Level = 3 Baseline = 0.8 – 1.4	Critical Level = 30 Baseline = 3.8 – 5.0

European bullhead, European brook lamprey, European otter and Atlantic salmon do not have critical loads/levels listed as there is no comparable habitat with established critical load estimates available.

Local contributions to nitrogen deposition (KgN/ha/yr) (APIS data)



3.5. Along with habitat impacts as a result of excess ammonia emissions and nitrogen deposition this issue is having an impact on ENPA's planning system and the associated farmers (applicants). Planning applications for new livestock buildings and manure/slurry stores (replacement or entirely new) require an assessment of the likely air quality impact of the development. This is prompted by Natural England's Impact Risk Zones which prompt the planning team to consult NE who then request it. This is usually undertaken by completing a SCAL Agriculture assessment. Where there are background levels of exceedance, Natural England are not currently able to support new buildings, even when these offer improved stock welfare conditions or even a small betterment, because if it does not bring the overall level below the threshold above which significant harm could occur, then it is maintaining an unacceptable position.

4. Specification / approach

4.1. ENPA officers have discussed these issues with NE who have made clear that ENPA needs to develop a bespoke strategy to start to deliver improvement on these issues which will allow planning applications to be approved (within appropriate, agreed, guidelines) whilst overall improving air quality for the SACs and SSSIs.

4.2. This commission is to investigate these issues and develop a strategy in response. The proposal/approach should include the following elements:

4.2.1. Interrogating the APIS model ([APIS app | Air Pollution Information System](#)) to better understand the data behind the air quality exceedances. This should include analysis of local monitoring stations and where the data is coming from.

- 4.2.2. Clearly setting out the sources (and relative scale) of pollutants.
- 4.2.3. Examining how the thresholds are set and how these apply to the habitats and features of the designated sites on Exmoor.
- 4.2.4. Detailing the impacts on protected sites and features through desktop research and analysis of existing information (highlighting any shortfalls), including the recent Air Pollution Trends Report 2023 [Microsoft Word - Trends Report 2023 Table 4.4a fixed.docx \(defra.gov.uk\)](#).
- 4.2.5. Investigating the scale and operations of farming systems in the affected areas on Exmoor. Are there specific locations or farms to focus on? Quotations should include a methodology for how to identify which farms to assess and the likely number of farms to be included in the analysis.
- 4.2.6. Investigating potential contributions from farms outside the National Park. Establishing the impact of sources outside Exmoor National Park and looking at cross boundary working if appropriate (potentially with Mid Devon District Council and North Devon Biosphere Reserve).
- 4.2.7. Investigating other sources of pollutants including game shoots. Investigating the impact of pheasant shoots on Exmoor's air quality. This is likely to be an initial desk study comprising a summary of existing evidence and considering game shoot management across Exmoor and in neighbouring areas.
- 4.2.8. Identifying practical and deliverable measures to reduce current pollution levels to below the thresholds. Including funding sources where appropriate. For example:
 - Practical measures on a single farm scale
 - Measures that farmers and land managers can take working together
 - Game shoot management
 - Grants available (e.g. Natural England Slurry Infrastructure grant, ENPA Farming in Protected Landscapes grant)
 - Good practice guidance and advice
- 4.2.9. Proposals should also set out whether it would be possible to model the impact of the pollution reduction/avoidance measures identified on case study farms to show improvements in levels of pollutants and an improvement in ecological conditions.
- 4.2.10. Examining the measures and processes required for planning applications, what the barriers are in meeting these, and how applicants can be supported to address them.

4.2.11. Developing a strategy to reduce air quality to below the SAC thresholds and avoid, reduce and mitigate future sources of air pollution to prevent future exceedances of the thresholds and impacts on the SACs and SSSIs. The strategy should cover the points above and provide targets and a pathway to reduce air pollution to a sustainable level below the thresholds, and a trajectory / timeline to achieve this. It should also include a monitoring protocol for a 3/5 year interim period to track the effectiveness of the measures identified.

5. Engagement with Stakeholders

- 5.1. The approach should include engagement with key partners in understanding and responding to the issues identified, including:
- ENPA
 - Natural England
 - Exmoor Hill Farming Network
 - Greater Exmoor Shoot Association
 - Farming and Wildlife Advisory Group SW
 - Mid Devon District Council
 - North Devon Biosphere Reserve
- 5.2. The approach should also include engagement with farmers, game shoot managers and other land managers to consider their views on the causes and potential solutions and support for the proposed strategy.

6. Outputs

- 6.1. The outputs from the commission should include:
- A main report setting out the work undertaken
 - A draft air quality management strategy covering the measures identified, targets, pathways and monitoring
 - A simple non-technical guide for farmers and land managers to explain air quality issues on Exmoor and planning / SCAIL issues, setting out good practice measures and what support and funding is available

7. Timescales

- 7.1. The timetable for commissioning the AQS is set out in the table below. Please note that this project will be grant funded and therefore there will be a delay in awarding the contract whilst the funding application is submitted and determined.

28 Feb	Invitation to quote published
25 March	Closing date for receipt of quotations
Mid April	Funding confirmed
Late April	Interviews (if required)

Late April	Contract award made
End April	Contract begins

7.2. An indicative timetable for carrying out the work is set out below (*this will be subject to discussion at the Inception meeting and alternative timings can be proposed*):

Early May	Inception meeting
May – Sept	Carry out analysis and stakeholder engagement
Sept	Draft outputs for discussion
Oct	Final outputs approved

8. Quotations

8.1. Quotations must include:

- An outline of how you would undertake the commission. This should include your understanding of the work required, your proposed approach, main activities, and any issues you would need to address
- Ability to meet the timescales set out and flexibility to respond to changes in the timetable
- Data or other requirements you will need from the Authority
- Details of key staff who would be involved in this contract, including their relevant experience and the role that each would play in delivering this contract, including breakdown of approximate number of days for each task
- Details of any non-staff expense included within your quotation.
- Business / organisational details including examples of undertaking similar work, and including contingency plans and resilience in the event of non-availability of key staff
- Confirmation that appropriate insurance (e.g. public liability, professional indemnity and Employers Liability) is held where necessary.
- Fixed price quote including all fees, travel and expenses (exclusive of VAT) including a breakdown of the costs you would propose to charge for undertaking the work required plus an hourly rate for any additional tasks we may ask of you.
- Contact details for referees from two current or recent relevant projects.

8.2. Quotations should be no more than 6 pages in length (not including appendices).

9. Guide Price and Payment

9.1. Payment will be on a staged basis to be agreed with the consultants based on delivery of the specified outputs at various stages of the project.

10. Selection of Contractor

- 10.1. The contract will be awarded on the basis of confidence in the Contractor achieving a high standard of work, completing the contract on time and in accordance with the specification and delivering good value for money.
- 10.2. Selection will be based on both value for money (price) and the following criteria:

Criteria	Score	Weighting
Understanding of the brief: Evidence of a clear and thorough understanding of the contract and proposed approach to delivering the commission, including a suitable methodology	1-5	x2
Delivery: Evidence of a proven ability to work to agreed deadline and flexibility to adapt to changes in the timetable	1-5	x1
Capability and experience: Skills, knowledge and qualifications of the personnel that will be undertaking the tasks requested and evidence of suitable experience with similar work	1-5	x2
Capacity and resilience: ability of you/your organisation to deliver the services requested within the timeframe; including ability to complete work under the contract in the event of the unplanned unavailability of key contractor staff	1-5	x1
Value for money (the fixed price quotation)	1-5	x2
Total: (out of 40)		

- 10.3. The following definitions will be used in scoring submissions:

Definition	Score
Question not answered / response is totally unsatisfactory. Does not meet minimum requirements or provide a solution	1
Only partially satisfies requirement, major deficiencies apparent.	2
Response meets acceptable criteria but is not comprehensive. Is sufficient response but more detailed proposals would score higher.	3
Response satisfies requirement and the details provided support the bid and add a good degree of value and information.	4

Proposals very comprehensive and/or innovative so as to exceed expectations	5
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10.4. The Authority:

- Shall not be bound to accept the lowest or any quotation
- May, at its sole discretion, accept the whole or part of any quotation; and
- Will require the preferred supplier to enter into a formal contract in writing based on the terms of this invitation to quote, the written quotation and the Authority's standard conditions of contract.

11. Submission of Quotation

11.1. Quotations must be submitted in writing, marked "CONFIDENTIAL – TENDER DOCUMENTS AQS" addressed to Head of Climate, Nature and Communities and may be sent either electronically to creid@exmoor-nationalpark.gov.uk or by post to: Exmoor National Park Authority, Exmoor House, Dulverton, Somerset TA22 9HL, together with supporting information, to arrive no later than **12 noon on 25 March 2024**.

11.2. Any quotation delivered after the specified time shall not be considered, save in exceptional circumstances and with good cause.

11.3. Exmoor National Park Authority is not responsible for and will not pay nor reimburse expenses, costs, fees etc. which have been incurred as part of the preparation or submission of the quote.

11.4. The Authority reserves the right not make any appointment and not to accept the lowest quotation.

11.5. Please note that individual emails should not exceed 24MB.

12. Contract Management

12.1. The contract will be let and managed by Clare Reid (Head of Climate, Nature and Communities) on behalf of the Authority. **All queries regarding the Invitation to Quote and matters concerning the scope of the Project, contract matters and other requirements should be directed to: Clare Reid, creid@exmoor-nationalpark.gov.uk and copied in to Ali Cockburn, alicockburn@exmoor-nationalpark.gov.uk (switchboard: 01398 323665).**

13. Disqualifications

13.1. The Authority will not consider any quote in respect of which the Respondent or any person acting on the Respondent's behalf, or with the consent, approval or knowledge of the Respondent is reasonably believed to have:

- directly or indirectly canvassed or attempted to canvass any Officer or Member of the Authority

- obtained or attempted to obtain information concerning the Invitation to Quote or award of the Contract or any other quotes from any Officer or Member of the Authority or any other person who supplies services to the Authority;
- fixed or adjusted or attempted to fix or adjust the prices shown in the Pricing Schedule by or in accordance with any agreement or arrangement with any other person;
- communicated or attempted to communicate to any person other than the Authority the amount or approximate amount of the prices shown in the Pricing Schedule, except where such disclosure is made in confidence in order to obtain quotations necessary for the preparation of the quote or for the purposes of insurance or financing;
- entered or attempted to enter into any agreement with any other person to the effect that such other person shall refrain from submitting a quote, or shall limit or restrict the prices to be shown or referred to in another quote;
- paid, offered or agreed to pay to any person any sum of money, inducement or valuable consideration, directly or indirectly, for doing or having done or causing or having caused to be done, or forbearing to do in relation to a quote;
- committed an offence under the Prevention of Corruption Acts 1889 to 1916 or given any fee or reward the receipt of which is an offence under Section 117(2) of the Local Government Act 1972 or the Bribery Act 2011.

14. Conditions of Contract

- 14.1. The successful Contractor will be invited to enter into a formal contract with the Authority in the terms of this invitation to tender, the tender and the Authority's standard conditions of contract.
- 14.2. Until a formal contract has been completed, the successful quotation together with the Authority's written acceptance will form a binding agreement between Authority and the Contractor based on the terms specified in this invitation to tender.

15. Declarations

- 15.1. Your quotation must declare any commercial, professional or personal interest or commitment which could prejudice your ability to undertake work on the Project or could give rise to a conflict of interest.

16. Freedom of Information

- 16.1. Information relating to any contract or procurement exercise to which the Authority is a party, including information about price and performance, is covered by the Freedom of Information Act 2000 (the Act). The Authority is under a legal obligation to disclose such information if requested unless an exemption under the Act applies.

- 16.2. Any person submitting a Quotation or entering into a contract with the Authority should, as part of the contract process, inform the Authority of any information which it regards as being confidential and/or eligible for a claim for exemption from disclosure by the Authority under the Act. The final decision as to what information can be disclosed rests with the Authority.