

Schedule of IEMA Comments

IEMA Comment	Author	Approach – Reference section within the Addendum to the ES	Additional comments/ addressed
<p>GENERAL</p> <p>Construction traffic is quantified and associated with specific construction activities. The total traffic is quantified and divided by the anticipated number of working days to provide a figure of average daily construction traffic (Chapter 3B, p 3B-27, Table 3B.10 & para. 3B11.4). Whilst this figure is helpful a maximum figure should be provided that would demonstrate the peak in traffic generation.</p>	IEMA Review	Chapter 4, Section 4.3.1	Addressed
<p>It would be useful to include the scoping opinion in the ES documentation.</p>	IEMA Review	Chapter 4, Section 4.3.2	Addressed. Please also refer to Appendix C.2
<p>Clarification should be provided on the extent of consultation relating to the scoping report and subsequent inputs to the scoping opinion. Confirmation should be provided that all of the appropriate statutory consultees were provided with an opportunity to comment on the scope of the EIA. Clarification should also be sought on whether non-governmental organisations and affected communities were provided with an opportunity to influence the scope of the EIA.</p>	IEMA Review	Chapter 4, Section 4.3.3	Addressed
<p>It is good practice to provide a record of the comments of the consultees and an indication of where and how these have been addressed in the ES.</p>	IEMA Review	Chapter 4, section 4.3.6	Addressed. Please also refer to Appendix C.3
<p>It would be helpful to have a clearer idea of the content of the CEMP and therefore the commitments being made.</p>	IEMA Review	Chapter 4, Section 4.3.7	Addressed. Please also refer to Chapter 3B of the ES
<p>Section 11.5.10 (p 11-23) refers to Figure 11.37. However, this figure is not provided within the ES.</p>	IEMA Review	Chapter 4, Section 4.3.8	Addressed. Please refer to Appendix C.4
<p>The beneficial and adverse effects are not always reported to an equal extent within the NTS giving the document an unbalanced feel.</p>	IEMA Review	Chapter 4, Section 4.3.9	Addressed. No new NTS is to be produced.

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<p>TRAVEL AND TRANSPORT</p> <p>Clarification should be provided on the basis for concluding that the effect on safety as a result of construction traffic generated by the proposal is “slight adverse” (6.5.3). This is particularly important as no significance levels are predicted for operational safety impacts.</p>	IEMA Review	Chapter 6, Section 6.6.1	Addressed.
<p>Table 6.5 includes a security assessment which compares the existing route with the Scheme route. Indicators for each of the Schemes are assessed as poor, moderate or high. These terms should be defined to ensure that the reader is clear what the outcome of the assessment is, e.g. should moderate be viewed as positive or negative, how does poor differ from moderate and high?</p>	IEMA Review	Chapter 6, Section 6.6.2	Addressed. Please also refer to Table 6.5.
<p>AGRICULTURE AND FORESTRY</p> <p>Table 7.1 provides criteria for evaluating the significance of impacts. Information identifying the basis for these classifications would increase the transparency of the assessment.</p>	IEMA Review	Chapter 7, Section 7.4.1 to 7.4.7	Addressed.
<p>Clarification should be provided on the likely rate of success of restoring land to agricultural use disaggregated to the various agricultural land quality classifications. In the event that there is a significant risk to successful restoration a reasonable worst case assessment should be provided.</p>	IEMA Review	Chapter 7, Section 7.4.8 to 7.4.17	Addressed
<p>GEOLOGY AND SOILS</p> <p>The assessment of contamination on the site is the result of a walkover survey and some preliminary investigations. However, chemical analysis has not been undertaken to determine the significance of any contamination that may be present (p 8-14, 8.4.2). A reasoned justification should be provided for not undertaking the investigations to enable the information to be considered within the ES.</p>	IEMA Review	Chapter 8, Section 8.6.1	Addressed. Also raised as Regulation 19 issues.

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The ES should clarify whether there is some uncertainty relating to the significance of the contaminated land effects.	IEMA Review	Chapter 8, Section 8.6.1	Addressed. Also raised as Regulation 19 issues.
WATER QUALITY AND DRAINAGE Quantifiable explanations for assessing the magnitude of the predicted impact on flooding could have been provided represented by a range of return periods for flooding.	IEMA Review	Chapter 9, Section 9.6	Addressed
AIR QUALITY Section 10.2.62 states that 'the contribution of the Scheme to tackling climate change has been assessed in the context of a 15% increase or reduction in net CO2 emissions ... from the Scheme, compared to the Do-Minimum option'. The ES should clarify what is meant by this statement as it is unclear how a 15% increase in net CO2 emissions can be classed as a contribution to tackling climate change.	IEMA Review	Chapter 10, Section 10.6.1	Addressed. Please also refer to Table 10.1
Table 10-A.4. The basis for the percentage changes as assigned to each level of significance should be described to enable the reader to understand why, for example, a 1.4% reduction in PM10 is significant.	IEMA Review	Chapter 10, Section 10.6.5	Addressed
Significance criteria for greenhouse gas emissions are provided in Table 10-A.9 (Appendix 10-A, p 10-A-16). These are based on changes from existing levels. Whilst this is the conventional approach to the assessment of any environmental effect, given that the UK stated policy on greenhouse gas emissions is a 60% reduction by 2050 with significant progress (26-32%) by 2020 one could argue that any increase should be considered to be of high negative significance as it is moving in the opposite direction to policy requirements.	IEMA Review	Chapter 10, Section 10.6.2	Addressed
Table 10.3 provides categories for sensitivity and magnitude of impact and demonstrates how these interact to result in a given significance level. Whilst the factors that are considered in determining magnitude and sensitivity are identified, the categories used are not defined making it difficult to see how and why impacts are attributed a given	IEMA Review	Chapter 10, Section 10.6.5	Addressed

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level of magnitude or sensitivity.			
The ES could have identified whether any mitigation for construction dust will be necessary during prolonged dry spells.	IEMA Review	Chapter 10, Section 10.6.9	Addressed
NOISE AND VIBRATION Information describing whether the local authority was consulted on the selection of the representative properties and their thoughts would be helpful.	IEMA Review	Chapter 11, Section 11.4.1	Addressed
Section 11.2.88 (p 11-16) indicates the Councils that have been consulted on the method used for the assessment of the impact of construction noise. A record of the comments or opinions of these authorities would be helpful to demonstrate that the assessment is in compliance with their requirements.	IEMA Review	Chapter 11, Section 11.4.1	Addressed
An assessment of night time noise impacts has not been undertaken. However, given that there is some prospect of night time construction work this assessment should be included in the ES (see.2.2.6 below).	IEMA Review	Chapter 11, Section 11.4.4	Addressed
Section 11.5.30 states that no significant night time noise impacts have been identified, but this should be placed in the context of no night time noise assessment being undertaken.	IEMA Review	Chapter 11, Section 11.4.4	Addressed
NATURE CONSERVATION AND BIODIVERSITY An indication of the purpose and methods of consultation with all groups listed would also be helpful.	IEMA Review	Chapter 12, Section 12.6.1 to 12.6.3	Addressed. Please also refer to Appendix I.3 of this Addendum
Table 12.14. The use of the term significance is confusing as it appears to actually relate to the importance of the resource rather than the significance of an effect to it.	IEMA Review	Chapter 12, Section 12.6.4 to 12.6.5	Addressed
The basis for evaluating the importance of Red Data Book bird species as being of only local value should be clarified.	IEMA Review	Chapter 12, Section 12.6.6	Addressed. Please also refer to the Design and Access Statement Addendum

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The location and current nature conservation and biodiversity value of the areas to be used as replacement habitat must be identified.	IEMA Review	Chapter 12, Section 12.6.7	Addressed. Please also refer to the Design and Access Statement Addendum
A clearer commitment to the provision of bat roosts would be helpful to ensure that they form part of the plans for the Scheme.	IEMA Review	Chapter 12, Section 12.6.8	
A range of commitments are included in the ES to improved habitat management of existing habitats and the creation and management of replacement habitat. Appendix 12-J provides a summary of management requirements. However, to demonstrate greater commitment to the implementation of the management requirements a clearer indication should be provided of the resources to be allocated to the management measures and the time period to which the commitment applies. Safeguards against the future withdrawal of the resources should also be outlined. These factors are particularly important as the habitat replacement and management plays an important role in compensating for the effects of the project.	IEMA Review	Chapter 12, Section 12.6.9	Addressed. Please also refer to Section 9.0 of the Design and Access Statement Addendum
LANDSCAPE AND VISUAL IMPACT Table 13.5. The explanations of the each of the classifications for sensitivity should provide a clearer indication of the factors that contribute to the sensitivity of the landscape.	IEMA Review	Chapter 13, Section 13.6.1	Addressed
The evaluation of the sensitivity of the landscape generally shows some consistency between the evaluation of the quality and value of the landscape and the sensitivity. An exception is the South Slopes of High Weald which is stated to be of high quality and value, but is considered to be moderately sensitive to change (Table 13.11). A justification for this apparent inconsistency would be helpful.	IEMA Review	Chapter 13, Section 13.6.3	Addressed
CULTURAL HERITAGE A reasoned justification should be provided for not undertaking the archaeological survey work in order for the information to be included	IEMA Review	Chapter 14, Section 14.7.1	Addressed. Also raised as a Regulation 19 issue.

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in the ES. This is particularly important for the cultural heritage surveys which are intended to be undertaken prior to the determination of the planning application (see 2.2.3 and 2.2.9 below).			
Given the proposal to provide the information after the publication of the ES clarification should also be provided that the additional information, when submitted, would be subject to the consultation requirements set out in the EIA Regulations.	IEMA Review	Chapter 14, Section 14.7.2	Addressed
EFFECTS ON PEDESTRIANS, CYCLISTS AND RECREATIONAL USERS Given that no replacement land has been identified for the Crowhurst Shooting Club the assessment would have been more robust if the worst case had been assumed (i.e. no replacement land is provided) and the impact had been assessed as 'large adverse'.	IEMA Review	Chapter 15, Section 15.6.1	Addressed
SOCIAL AND COMMUNITY EFFECTS Clarification should be provided on the basis for the conclusion in the final section of this chapter. If it is the result of a systematic evaluation then the method used should be described. If, however, it is simply the opinion of the assessor then this should be clearly stated, as a minimum, and preferably should be omitted from the ES.	IEMA Review	Chapter 15, Section 15.6.4 to 15.6.10	Addressed. Please also refer to Table 15.6
COMBINED AND CUMULATIVE EFFECTS The ES provides a conclusion on the overall construction impact of the development. This would require a trade off between the different types of effects to reach this conclusion. As a minimum, the method for undertaking this should be described and the approach justified. However, as with the point made above, if the conclusion represents the opinion of the assessor then it should be clearly stated as being an opinion.	IEMA Review	Chapter 16, Section 16.2	Addressed.

