

**Comments on The Essex guide to environmental assessment,  
Consultation draft 1997.**

From the Institution of Environmental Sciences

*Section 1.2 & 1.20, pages 3 & 7*

There appears to be some inconsistency of numbering in Part 1

*Section 1.22, page 7*

Other guidance could be mentioned here, e.g. Environmental Agency guidance, and the DoT guidance on environmental assessment.

*Section 5.16, page 36*

There is a danger that too much assessment can be undertaken in reaching a decision. To justify a decision that an EA is necessary, areas of uncertain impacts should be identified.

With the reorganisation of the DoE and DoT the title of the Secretary of State has changed. There may be other places in the guide where this alteration may be needed.

*Section 7.3, page 55*

Resources and Receptors

The terms environmental resource and environmental receptor are not mutually exclusive. The use of the term environmental receptor can include both the physical and biological attributes of the environment.

Uncertainty

Uncertainty is the probability of an event occurring. The term risk refers to probability in relation to the consequences of an event.

*Section 8.7, page 60*

A combined ES for the purposes of IPPC and planning is not generally possible as IPPC requires highly technical information presented in a specific format. However running the two applications in parallel can save effort on behalf of the applicant and the statutory authorities.

*Appendix A – Topic 5, page A9*

Although not explicitly stated, a main aim of PPG9 is protection of important habitats.

*Appendix A – Topic 5, page A11*

IES recommend that terrestrial invertebrates are included in the diagram, perhaps by renaming the Latin term Lepidoptera as terrestrial invertebrates. This would then include beetles, flies, bugs etc.

Ancient woodland surface features can be surveyed at any time of year although it is sometimes more difficult in spring and summer, depending on the nature of the ground flora. It is suggested that from April to November is a poor time to survey these features.

*Appendix A – Topic 5, page A12*

Under remedies/compensation the slow speed of ecological change should be emphasised; “new habitats can take decades to achieve maturity.”

*Appendix A – Topic 6, page A13*

The effect of soil compaction on crop yields should be explicitly mentioned as it can be of considerable significance.

*Appendix A – Topic 7, page A17*

Agricultural land classification is denoted by grades 1 through to 5 and not classes I to V. Dogmatic survey of grade 3 land is not recommended; it depends on the size of land affected and the sub-grade. Grade 3b land would not normally require a survey.

*Appendix A – Topic 7, page A19*

Use of screening to mitigate recreation and leisure impacts can also include mounding besides vegetation.

*Appendix A – Topic 8, page A21*

The section on Water Quality Impacts: Pollution is confused. It does not differentiate between primary effects on water quality and secondary impacts on aquatic eco-systems affecting vegetation and therefore visual quality etc. For instance the effect on potable water abstraction is mentioned as a secondary impact stemming from altered habitats. Pollution on its own affects the suitability of water for abstraction. There are other examples of confusion in this section.

*Appendix A – Topic 9, page A24*

Potential Effects/Impacts

Emissions of sulphur are referred to as sulphur, sulphurous oxides and sulphur dioxide in three separate paragraphs. Sulphur dioxide is preferable.

Benzene is one of many volatile organic compounds that arise from transport emissions. We suggest using the term VOC and giving benzene as an example. A significant impact on ozone is its affect on a vegetation which results in considerable reductions in crop yields.

Particulates are listed, it may be of benefit to specifically mention PM10s.

*Appendix A – Topic 9, page A25*

AEA Technology is a quoted company and it is not appropriate to list it here.

*Appendix C – e) other expert bodies and useful contacts.*

The Institution does not support the inclusion of commercial bodies and academic institutes that carry out commercial work. These include CEMP/CORDaH, AEA Technology, WRC, EIA Unit (Aberystwyth), TRL, Oxford Brookes University and Unit of Comparative Plant Ecology. Some of the academic institutions differ in the degree to which they are commercially active and a case could be made for including one or two, such as the Unit of Comparative Plant Ecology.

*Appendix D, page D1*

The new EA Directive should be included, Directive 97/11/EC. Regulations to transpose this legislation are obviously imminent.