

Ref. 2003-08017-EP00123

November 17, 2003

Mr. Stanley Nansen  
General Manager  
Rose Hall Development Limited  
P.O. Box 186 Rose Hall  
St. James

Dear Mr Nansen:

**Re: Permit Application for Subdivision at Rose Hall, St. James**

The National Environment and Planning Agency has reviewed the application for the above-mentioned project. An officer of this Agency inspected the site on October 24, 2003. When the original subdivision Master plan was approved on the 3<sup>rd</sup> December 2001 the Natural Resources Conservation Authority (NRCA) had determined that a Strategic Environmental Impact Assessment (SEA) of the total area proposed for development was required see Specific Condition 10 of the permits 035 PO1A and 035PO1B issued on December 3, 2001, with respect to the subdivision N and L states:

*"The Permittee shall prepare and submit a Strategic Environmental Assessment of the total contiguous area owned by the proponents, which include impacts and mitigatory measures for the proposed developments outlined in the Conceptual Master Plan dated March 15, 2000".*

There is no record of compliance with this condition in our records.

Several concerns have been raised related to the proposed development within the area. The Rose Hall area is an environmental **HOT SPOT** in which the assimilative capacity of the nearby marine environment is considered chronic as a result of pollution from sediment and nutrient run off from nearby point and non-point sources. A strategic environmental assessment on the entire area will guide the Authority in any further deliberation on applications falling within the context of the Master Plan.

Your specific proposed Terms of Reference (TOR) must be submitted to this office for approval prior to commencement of the SEA. Please note that **no** SEA will be accepted without a **prior approved** Terms of Reference.



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The TOR for the Strategic Environmental Assessment shall address but not be restricted to the following areas:

1. A survey with respect to existing vegetation, vegetation loss and hence loss of
2. habitat for the fauna in the area.
3. A determination of the effect the proposed development on the presence of local migratory bird species.
4. The level of biodiversity of the site.
5. The impact that this Proposed Development Project will have present to users of the site and communities nearby.
6. A socio-economic survey to gauge public perception/support for the project.
7. The identification of possible alternatives to the proposed developments.
8. The identification of the priority areas proposed for development.
9. The identification of any other environmental concern that may occur as a result of the proposed development and mitigation measures to address these concerns.
10. Erosion mitigation with respect to proximity of the development site to a coastal/marine environment and reefs.
11. The impact of the project on the sea, wetlands and the surrounding area especially as it relates to the cumulative impact of this project.
12. Drainage, especially with respect to existing natural drainage channels and the cumulative impact of increased drainage in the area.
13. The proposed method, level and location of any sewage treatment option and the impacts and cumulative impacts of its disposal on the environment. Clarification must be given regarding the proximity of the proposed treatment system to the marine environment, other houses and basic infrastructure.
14. The impact of the proposed developments on the historical, cultural and archaeological sites in the area.
15. The SEA document must identify the parties to be responsible for the implementation of the mitigation plan, environmental monitoring and management plan aspects of the project.

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We anticipate an early response to this query, please be reminded that based on the policy of this Agency failure to respond within **30 days** will result in this application being removed from those being actively considered

Yours sincerely



Krishna Desai  
for Chief Executive Officer.

Cc Mr. Noel Whyte, Noel Whyte and Associates Limited  
Dr. Margaret Jones Williams, Environmental Solutions Limited  
Mr. Franklin McDonald, CEO, NEPA