

CRUACH CLENAMACRIE WIND FARM

CHAPTER 3: EIA METHODOLOGY

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RESPONSIBILITIES

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ABBREVIATIONS

ABBREVIATION	DESCRIPTION
CEMP	Construction Environmental Management Plan
ECU	Energy Consents Unit
EIA	Environmental Impact Assessment
IEMA	Institute of Environmental Management and Assessment
NTS	Non-Technical Summary
PAC	Pre-Application Consultation



3 EIA METHODOLOGY

3.1 Introduction

This chapter describes the methodology and approach applied to the Environmental Impact Assessment (EIA) Report chapters for Cruach Clenamacrie Wind Farm (the 'Proposed Development').

This EIA has been carried out in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (EIA Regulations). Further information on the regulatory framework is presented in **EIA Report Chapter 2: Planning and Renewable Energy Policy.**

The approach to the EIA also follows the requirements of guidance including:

- Institute of Environmental Management and Assessment (IEMA) Environmental Impact Assessment Guide to Shaping Quality Development¹;
- Environmental Impact Assessment Handbook; guidance for competent authorities, consultation bodies and others involved in the Environmental Impact Assessment process for Scotland²; and
- Receptor-specific guidance documents. Where specific guidance has been used it has been identified in the Legislation, Policy and Guidance section of each technical chapter within the EIA Report.

EIA is a statutory process governed by UK law. It is a means of drawing together, in a systematic way, an assessment of the likely significant environmental impacts arising from a proposed development. This section presents an overview of the methodology to be utilised for the production of the EIA Report. It outlines the methodology for identifying and evaluating potential likely significant environmental effects, both for the Proposed Development itself and cumulatively with other developments.

3.2 The Requirement for EIA

The EIA Regulations are specifically relevant to the Proposed Development. A Scoping Request was submitted to the Scottish Government in June 2023 (**Appendix 1.1**) as the Proposed Development falls within Schedule 2 of the EIA Regulations and as such requires an EIA to be undertaken given the scale and nature of wind farm developments and the potential to have likely significant effects. The need for an EIA was confirmed by the Scoping Opinion (**Appendix 1.2**) received from the Scottish Government on 14 September 2023.

Regulation 5(2) of the EIA Regulations outlines the requirements of what should be included as a minimum by the developer within an EIA Report. **Table 3.1** below outlines where each of these requirements has been provided within the EIA.

Table 3.1: Information Required under Regulation 5(2)

REQUIRED INFORMATION (REGULATION 5(2))	LOCATION WITHIN THE EIA REPORT
(a)a description of the development comprising information on the site, design, size and other relevant features of the development;	The Proposed Development is described in EIA Report Chapter 5: Project Description . This includes details on the Site, the components of

¹ IEMA (2015). Environmental Impact Assessment Guide to Shaping Quality Development. Available at: https://www.iaia.org/pdf/wab/IEMA%20Guidance%20Documents%20EIA%20Guide%20to%20Shaping%20Quality%20Development%20V6.pdf (Accessed 25/04/2024).

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² NatureScot and Historic Environment Scotland (2018). Environmental Impact Assessment Handbook: Guidance for competent authorities, consultation bodies, and others involved in the Environmental Impact Assessment process in Scotland. Available at: https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=6ed33b65-9df1-4a2f-acbb-a8e800a592c0 (Accessed 25/04/2024).



	the Proposed Development and the scale and size of the development. EIA Report Chapter 4: Assessment of Alternatives outlines the design process undertaken to reach the final turbine layout and infrastructure design.
(b)a description of the likely significant effects of the development on the environment;	The likely significant effects arising from the construction and operation of the Proposed Development, along with the measures required to mitigate these, and the predicted significant residual effects are provided in each of the technical chapters of the EIA Report (Chapters 6 to 17).
(c)a description of the features of the development and any measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;	The overall approach to mitigation is included within Section 3.6: Mitigation of this chapter. EIA Report Chapter 4: Assessment of Alternatives outlines the design decisions made to limit effects on the environment as far as possible. Specific mitigation measures are included within each technical chapter of the EIA Report (Chapters 6 to 17) and the committed mitigation measures are detailed in EIA Report Chapter 18: Summary of Mitigation.
(d)a description of the reasonable alternatives studies by the developer, which are relevant to the development and its specific characteristics, and indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;	EIA Report Chapter 4: Assessment of Alternatives outlines the design process taken and the design alternatives considered in reaching the final design.
(e)a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and	The Non-Technical Summary (NTS) is provided as a stand-alone document as part of the planning application.
(f)any other information specified in schedule 4 relevant to the specific characteristics of the development and to the environmental features likely to be affected.	Table 3.2 below outlines the requirements of schedule 4 and where these have been addressed throughout the EIA Report and supporting documents.

Table 3.2 below sets out how the 'Information for Inclusion in Environmental Statements' required under Schedule 4 of the EIA Regulations has been provided within this **EIA Report.**

Table 3.2: Information Required within the EIA Report under Schedule 4

REQUIRED INFORMATION (SCHEDULE 4)	LOCATION OF INFORMATION WITHIN THE EIA REPORT
A description of the development, including in particular: (a) a description of the location of the development; (b) a description of the physical characteristics of the whole development, including where relevant,	The Proposed Development is described in EIA Report Chapter 5: Project Description . This includes a description of construction activities and associated works, and the operational phase,

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REQUIRED INFORMATION (SCHEDULE 4)	LOCATION OF INFORMATION WITHIN THE EIA REPORT
requisite demolition works, and the land-use requirements during the construction and operational phase;	including maintenance and decommissioning phase.
(c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases).	The Site location is shown in Figure 1.1 and the Site layout/Proposed Development is illustrated in Figure 5.6. Expected residues and emissions are addressed in EIA Report Chapter 17: Climate Change and Carbon Balance.
2. A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	EIA Report Chapter 4: Assessment of Alternatives describes the design process by which the final turbine layout and infrastructure design has been chosen to become the final Proposed Development. The chapter also discusses the various alternatives considered and why they were discounted.
3. A description of the relevant aspects of the current state of the environment (the "baseline" scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of relevant information and scientific knowledge.	A description of the current environment and the baseline is provided within each technical chapter of the EIA Report (Chapters 6 to 17). The future baseline scenario is addressed in EIA Report Chapter 3: EIA Methodology.
4. A description of the factors specified in regulation 4(3) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	The receptors likely to be significantly affected by the Proposed Development are provided in each of the technical chapters of the EIA Report (Chapters 6 to 17). This is informed by the Scoping Opinion and consultation feedback. A summary of consultation feedback can be found within the PAC Report which is a separate document from the EIA Report but is included as part of the planning application submission.
5. A description of the likely significant effects of the development on the environment resulting from, inter alia: (a) The construction and existence of the development, including, where relevant, demolition, including, where relevant, demolition works; (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;	The likely significant effects arising from the construction and operation of the Proposed Development, along with the measures required to mitigate these, and the predicted significant residual effects are provided in each of the technical chapters of the EIA Report (Chapters 6 to 17). This includes detailing the nature and duration of the likely significant effects. EIA Report Chapter 5: Project Description provides details relating to 5(a).

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REQUIRED INFORMATION (SCHEDULE 4)

- (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
- (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
- (e) the cumulation of effects with other existing and/or approved development, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
- (f) the impact of the development on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the development to climate change; and
- (g) the technologies and the substances used.

The description of the likely significant effects on the factors specified in regulation 4(3) should cover the direct effects and any indirect, secondary, cumulative transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established as Union level (as they had effect immediately before the Implementation Period (IP) completion day on 31 December 2020) or United Kingdom level which are relevant to the development including in particular those established under the law of any part of the United Kingdom that implemented Council Directive 92/43/EEC and Directive 2009/147/EC.

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent to which significant adverse effects on the environment are avoided, prevented, reduced or

LOCATION OF INFORMATION WITHIN THE EIA REPORT

EIA Report Chapter 9: Geology, Hydrogeology, Hydrology and Soils, Chapter 10: Ecology, EIA Report Chapter 11: Ornithology, provide details relating to 5 (b).

EIA Report Chapter 8: Noise and EIA Report Chapter 17: Climate Change and Carbon Balance provide details relating to 5 (c).

EIA Report Chapter 8: Noise and Chapter 7: Cultural Heritage and Archaeology provide details relating to 5 (d).

EIA Report Chapters 6 to 17 each provide an assessment of cumulative effects.

EIA Report Chapter 17: Climate Change and Carbon Balance provides details relating to 5 (f). EIA Report Chapter 5: Project Description provides details relating to the technologies and substances used.

Cumulative effects are provided in each technical chapter of the **EIA Report**.

The overall approach and methods used for the EIA are provided in EIA Report Chapter 3: EIA Methodology. The specific approaches and methods used for each technical assessment are included within the relevant technical chapters of the EIA Report (Chapters 6 to 17).

The general approach to the EIA is described in **EIA Report Chapter 3: EIA Methodology.**The methods used for each technical assessment are included within the relevant technical chapter of the **EIA Report (Chapters 6 to 18).**

The overall approach to mitigation is included within Section 3.6: Mitigation of this chapter. Specific mitigation measures are included within each technical chapter of the EIA Report (Chapters 6 to 17) and the committed mitigation measures are detailed in EIA Report Chapter 18: Summary of Mitigation.

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REQUIRED INFORMATION (SCHEDULE 4)	LOCATION OF INFORMATION WITHIN THE EIA REPORT
offset, and should cover both the construction and operational phases.	
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned.	Scoped out of the EIA Report. See Appendix 1.2 - Scoping Opinion
9. A non-technical summary of the information provided under paragraphs 1 to 8.	The NTS is provided as a stand-alone document as part of the planning application.
10. A reference list detailing the sources used for the descriptions and assessments included within the EIA Report.	References are provided at the end of each chapter of the EIA Report .

3.3 Consultation

Consultation is a key component of the EIA process, and continues throughout the lifecycle of a development, from its initial stages through to consent, construction, operation, and decommissioning. This section details the consultation process undertaken during the design and EIA process.

3.3.1 Scoping

A **Scoping Report (Appendix 1.1)** was submitted to Scottish Ministers on 25 June 2023 and a **Scoping Opinion (Appendix 1.2)** was received on 14 September 2023. A summary of key issues raised during consultation, both as part of the Scoping Opinion and in response to additional pre-application consultation, has been included in each technical chapter of the **EIA Report (Chapters: 6-17)** as applicable.

The EIA for the Proposed Development has been informed by the Scoping Opinion provided by the Scottish Government, ongoing consultation with statutory bodies and other stakeholders as well as consultation with local communities. A list of all statutory and non-statutory stakeholders consulted during scoping and preparation of the EIA Report is provided in the Scoping Opinion (Appendix 1.2). Responses to each consultation response are outlined in each technical chapter of the EIA Report (Chapters 6-17).

As part of the Energy Consents Unit (ECU) gate check process, a gate check report has been prepared which also provides details on how scoping responses have been addressed within the EIA Report and through the design of the Proposed Development. The Gate Check Report was agreed with the ECU in September 2024.

3.3.2 Pre-Application Consultation Events

Two rounds of public consultation events have taken place in accordance with the ECU's Good Practice Guidance³. The public consultation events were held as follows:

- In person events at Taynuilt (4 October 2023, 21 February 2024)
- In person events at Connel (5 October 2023, 22 February 2024)
- In person events at Kilmore (3 October 2023, 20 February 2024)

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³ ECU (2022) Good Practice Guidance for Applications under Section 36 and 37 of the Electricity Act 1989. (Accessed 18/10/2024)



In person event at North Connel (20 February 2024)

Further details of the pre-application consultation, including feedback received during the consultation is contained within the **PAC Report**.

3.4 Requirement for Competent Experts

The team undertaking the EIA for the Proposed Development is comprised of a number of specialist consultants. The team is comprised of an EIA professional who takes the lead role in the coordination and management of the EIA. The EIA lead is supported by a wider team of technical specialists taking responsibility for the data collection data analysis and technical impact assessments.

The technical assessments are led by a lead technical author who is a recognised expert in their field and has significant experience in the preparation of impact assessments. The lead author takes responsibility for the quality of the data gathered; the assessment methodology to be undertaken, the impact assessments made and any proposed mitigation measures. The lead author is usually supported by a team of consultants and their work is subject to both technical and consistency review by a Project Director and the EIA lead.

The technical lead of each topic and their qualifications and experience is detailed in **Table 1.1** of **EIA Report Chapter 1: Introduction**.

3.5 Assessment Methodology

The individual methodologies for assessing each EIA topic are described in more detail in each of the topic chapters within the **EIA Report**. The following sections briefly outline the overarching assessment methodology to be undertaken.

The main steps in the EIA assessment process for the Proposed Development have been:

- Summary of the relevant legislation, policy and guidance documents used to inform the assessment;
- Discussion of the results of consultation for each technical chapter;
- Identification of the chapter specific assessment methodology;
- Identification of the existing baseline conditions at the Site and surroundings area;
- Prediction of the likely environmental impacts (both adverse and beneficial) associated with the construction, operation and decommissioning of the Proposed Development;
- Identification of mitigation to avoid, prevent or reduce or, if possible, offset adverse effects;
- Assessment of the significance of any residual effects after mitigation, in relation to the sensitivity
 of the feature impacted upon and the magnitude of the effect predicted, in line with the methodology
 identified in Section 3.6.2;
- Cumulative assessment based on developments in Table 3.4; and
- Summary of likely significant effects.

3.5.1 Identification of Environmental Baseline

A review of the current environmental conditions was undertaken to determine the appropriate baseline for assessment. In the majority of assessments this involved the following;

- Determining the realistic worst-case parameters for each assessment receptor;
- Definition of an appropriate study area, based on guidance and best practice;
- A review of currently available information relating to the development study area;
- Identification of likely impacts;

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- Outline further data/survey/monitoring undertaken to obtain relevant information if required to support assessment; and
- Review information to ensure sufficient data is available to provide a robust assessment.

3.5.1.1 Future Baseline

It is required under the EIA Regulations to provide a description of the current state of the baseline and outline the likely evolution from the baseline in the absence of the Proposed Development.

The land use of the Site, in the absence of the Proposed Development, will remain as it is currently under the existing landowners, as an area of upland grazing. There are not currently any habitat improvement or biodiversity enhancement plans proposed in the absence of the Proposed Development.

Changes in the physical environment due to climate change can subsequently impact the environment via alterations such as an increase in summer temperatures and a decrease in rainfall. This could lead to impacts on habitats and species. However, a comprehensive assessment of these impacts and effects is challenging due to the uncertainty surrounding how the physical environment reacts to climate change and for the purposes of this assessment it has been assumed that without the implementation of the Proposed Development it is not anticipated that there will be any change to the baseline scenario that is described within each chapter of the EIA Report.

3.5.2 Assessment of Effects

The methods for predicting the nature and magnitude of any potential impacts vary depending on the subject area. Quantitative methods of assessment can predict values that can be compared against published thresholds and indicative criteria in government guidance and standards. Where it is not possible to use a quantitative method, a qualitative assessment method was utilised, these assessments rely on the experience and professional judgement of the technical specialist.

The factors specified in Schedule 3, Paragraph (3) of the Electricity Act (Environmental Impact Assessment) (Scotland) Regulations 2017⁴ have been considered in the EIA including:

- The magnitude and spatial extent of the impact (for example, geographical area and size of the population likely to be affected);
- The nature of the impact;
- The intensity and complexity of the impact;
- The probability of the impact;
- The expected onset, duration, frequency and reversibility of the impact;
- Cumulative impacts with the impact of other existing and/or approved development(s); and
- The possibility of effectively reducing the impact.

Likely significant effects of the factors above have been assessed taking into account, as explained below, the predicted magnitude of change and the sensitivity of the receptor. **Table 3.3** is used as a guide to determine an overall significance of effect using the relationship between the sensitivity of the identified receptor and the anticipated magnitude of an impact/change and will be used throughout this **EIA Report** unless otherwise stated in the technical chapter. The magnitude of impact/change for each effect has been identified and predicted as a deviation from the established baseline conditions. The sensitivity of the receptor/receiving environment to change has been determined using professional judgement, consideration of existing designations and quantifiable data, where possible. Each technical chapter has defined what constitutes a particular level of magnitude of change and sensitivity of receptor. In some

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⁴ The Electricity Act (Environmental Impact Assessment) (Scotland) Regulations 2017. (Accessed 24/06/2024).



instances, professional judgment has been used to inform the assessment based on previous experience of the assessor.

TABLE 3.3: MATRIX FOR EVALUATING SIGNIFICANCE OF AN EFFECT

SENSITIVITY	MAGNITUDE OF CHANGE				
SENSITIVITY	High	Medium	Low	Negligible	
High	Major	Major/Moderate	Moderate/Minor	Negligible	
Medium	Major/Moderate	Moderate	Minor	Negligible	
Low	Moderate/Minor	Minor	Minor/Negligible	Negligible	
Negligible	Negligible	Negligible	Negligible	Negligible	

The following terms are used in the **EIA Report**, unless otherwise stated, to determine the level of effects predicted to occur:

- Major beneficial or adverse effect where the Proposed Development would result in a significant improvement (or deterioration) of the existing environment;
- Moderate beneficial or adverse effect where the Proposed Development would result in a noticeable improvement (or deterioration) of the existing environment;
- Minor beneficial or adverse effect where the Proposed Development would result in a small improvement (or deterioration) of the existing environment; and
- Negligible where the Proposed Development would result in no discernible improvement (or deterioration) of the existing environment.

Using professional judgement and with reference to the Guidelines for EIA⁵, the assessments within this **EIA Report** consider effects of moderate and greater to be significant, while those of minor significance and less to be not significant. Where there are deviations from this criterion these will be clearly stated within the individual technical chapters.

Overall residual effects which account for any mitigation measures are provided at the end of each technical chapter of the **EIA Report**. The distinction has also been made between direct and indirect, short and long term, permanent and temporary, and beneficial and adverse effects.

Technical chapters have stipulated specific assessment criteria, which differs from the general approach described above.

3.6 Mitigation

The aim of proposing mitigation measures is to avoid, reduce and offset any significant adverse environmental effects arising from the Proposed Development, as identified throughout this EIA Report. There are different types of mitigation used in this **EIA Report**, including embedded mitigation and additional mitigation.

3.6.1 Embedded Mitigation

Embedded mitigation comprises both design features and construction good practice. These measures are assumed to be in place prior to undertaking the EIA and for part of the Proposed Development. Embedded mitigation can include:

Minimising potential permanent effects of the Proposed Development through design; and

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⁵ IEMA (2016) Environmental Impact Assessment Guide to: Delivering Quality Development (Accessed: 24/06/2024)



 Construction good practice, such as those measures identified in a Construction Environmental Management Pan (CEMP)

Any further details of embedded mitigation for the Proposed Development are included in the appropriate technical assessment chapters.

3.6.2 Additional Mitigation Measures

Where possible, reasonable steps will be taken during the design process to avoid the creation of significant adverse effects. Where these cannot be avoided completely, appropriate mitigation will be proposed to avoid or reduce the impacts to acceptable levels. This mitigation can include:

- Changes to the Proposed Development design;
- Physical measures applied on Site; and
- Measures to control particular aspects of the construction or operation phases.

Mitigation measures are presented as commitments in order to ensure a level of certainty as to the environmental effects of the Proposed Development. There are various ways in which a level of certainty can be ensured, such as the use of planning conditions.

A schedule of all of the mitigation measures proposed within this EIA Report is presented within **EIA Report Chapter 18: Summary of Mitigation.**

3.7 Cumulative Effects

Cumulative effects are those which result from incremental changes caused by past, present or reasonably foreseeable future actions resulting from the introduction of the Proposed Development in-combination with other developments.

3.7.1 In-Combination Effects

In-combination effects are the combined effect of the Proposed Development together with other reasonably foreseeable developments on a common receptor.

Development proposals which have been included in the cumulative assessment are listed in **Table 3.4** below. The requirements will differ for different technical assessments and may include existing as well as proposed wind farm developments. The criteria for developments being included are those which are classified as EIA development which have planning applications submitted, approved or are under construction, and are located within a 25km radius of the Application Boundary.

Cumulative effects have been considered in detail and in accordance with guidance related to each topic within each chapter. The cumulative situation changes frequently as applications are made or withdrawn, and the layouts of submitted wind farm applications are changed. It is therefore necessary to decide on a cut-off date when the sites and layouts to be included are fixed. The EIA Report includes operational, consented and application stage wind energy development as of 22nd August 2024. The specific methodologies and developments included are detailed within each of the technical assessments within EIA Report Chapters 6 – 17.

TABLE 3.4: DEVELOPMENT TO BE CONSIDERED IN CUMULATIVE ASSESSMENT

CUMULATIVE DEVELOPMENT	DISTANCE TO CLOSEST TURBINE	
Operational		
Barran Caltum	4.1km	

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CUMULATIVE DEVELOPMENT	DISTANCE TO CLOSEST TURBINE
Beinn Ghlas	4.3km
Carraig Gheal	8.3km
An Suidhe	21.5km
Consented	
Blarghour Variation	17.1km
In Planning	
An Carr Dubh	18.6km
Ladyfield	20.3km
In Scoping	
Corr Chnoc	1.6km
Beinn Ghlas Repower	4.2km
Musdale	4.9km
Barachander	7.4km
Eredine	23.1km

3.7.2 Effect Interactions

Effect interactions are the combined or synergistic effects as a result of the Proposed Development on a particular receptor which may collectively cause a more significant effect than individually. A theoretical example is the culmination of disturbance from dust, noise, vibration, artificial light, human presence and visual intrusion on sensitive fauna adjacent to a construction site.

The cumulative effect interactions assessment is presented within each individual technical chapter (EIA Report Chapters 6-17) where relevant.

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