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Chapter 4 – Scope & Methodology [Document Reference: ST19595-REP-002] January 2024





Revision History

Revision	Revision date	Details	Authorized	Name	Position

List of Outstanding Issues and Information

Outstanding issue/info.	Section/Paragraph	Responsibility	Action

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4. Scope & Methodology

4.1 Introduction

- 4.1.1 A Preliminary Environmental Information Report (PEIR) is the first major output of the Environmental Impact Assessment (EIA) process provided to support statutory consultation. The PEIR sets out the environmental baseline conditions, a preliminary identification of the likely significant impacts of the Proposed Development and initial proposals to mitigate or manage any significant adverse effects.
- 4.1.2 The EIA is being undertaken, and this PEIR has been prepared, in accordance with the EIA Regulations and with reference to the following guidance:
 - Planning Inspectorate Advice Note 3: EIA Consultation and Notification (August 2017; Version 7)
 - Planning Inspectorate Advice Note 7: Environmental Impact Assessment Process: Preliminary Environmental Information, Screening and Scoping (June 2020; Version 7)
 - Planning Inspectorate Advice Note 9: Rochdale Envelope (July 2018; Version 3)
 - Planning Inspectorate Advice Note 11: Working with Public Bodies in the Infrastructure Planning Process (November 2017; Version 4)
 - Planning Inspectorate Advice Note 17: Cumulative Effects Assessment (August 2019; Version 2)
- 4.1.3 Preliminary Environmental Information (PEI) is defined at Regulation 12 of the EIA Regulations as *"information which... is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)".*
- 4.1.4 As set out at Paragraph 8.8 of Advice Note 7, it is important to note that the information within this report is preliminary in nature. The Applicant has carefully considered the timing of this PEIR, ensuring that sufficient detail is available to undertake a meaningful assessment whilst there is still sufficient flexibility for comments received during the consultation to be taken into consideration. The Applicant is actively seeking consultee comments on the PEI, to assist with the identification of potential effects and ensure the assessment of effects presented within the ES is robust.
- 4.1.5 The following chapter sets out the scope of the EIA and how this was agreed, and a summary of the general EIA assessment methodology.

4.2 EIA Scoping

4.2.1 The scoping process is intended to identify the key expected environmental issues at an early stage, to determine which aspects of the Proposed Development are likely to result in significant effects on the environment and



to establish the level of information to be provided in the Environmental Statement (ES).

- 4.2.2 Schedule 4 of the EIA Regulations sets out the requirements for an ES, stating that the ES should include 'a description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (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'.
- 4.2.3 The Applicant undertook initial baseline surveys of the Site and surrounding area in order to identify the likely significant effects of the Proposed Development, in accordance with Schedule 4. This work informed the production of a Scoping Report (Appendix 1.1), which set out the issues that the Applicant considered the EIA needs to address and was submitted to PINS on 19th April 2023.
- 4.2.4 PINS reviewed and consulted on the EIA Scoping Report and adopted a Scoping Opinion (Appendix 1.2) on 26th May 2023. PINS formally consulted prescribed consultation bodies and their responses are included within the Scoping Opinion.
- 4.2.5 A summary of the issues raised in the Scoping Opinion and how these have been addressed as part of the EIA is set out below.
- 4.2.6 In accordance with the Scoping Opinion, the following topics are being considered within the EIA:
 - Landscape & Visual
 - Ecology
 - Cultural Heritage
 - Access & Traffic
 - Noise & Vibration
 - Water Resources
 - Climate Change
 - Glint
 - Soils & Agricultural Land
 - Socio-Economics
 - Air Quality
- 4.2.7 The above topics are addressed proportionately in relation to the likelihood for significant effects described in Chapters 14 of the Scoping Report. Each technical chapter provides further detail on the scope of each topic raised during the Scoping process and how any matters raised have been responded to.
- 4.2.8 Through Scoping it has been agreed that a number of topics do not require a full technical chapter within the ES as they are not likely to result in significant effects, but have still been considered in order to inform the development design and required mitigation.

4.2.9 Table 4.1 below sets out a summary of those aspects which were proposed to be scoped out in the Scoping Report, PINs comments on the same in the Scoping Opinion and (where necessary) how they have been considered in the PEIR.

TOPIC	SUMMARY
Air Quality	PINS did not agree to scope this aspect out due to insufficient information at the stage of Scoping on operational and construction matters and the likelihood of significant effects. Air Quality has therefore been scoped in as a topic and a full review of the Scoping Opinion matters in relation to Air Quality are provided within Chapter 16.
Ground Conditions	PINS agreed that significant effects on ground conditions during construction and operation are unlikely, subject to the results of the Phase 1 Ground Conditions and contamination Desk Study Report being known. PINS requested the ES provide these results as justification of the approach being taken and if identified, the ES should assess significant effects on ground conditions where they are likely to occur.
	A Ground Conditions Desk Study has been undertaken as a standalone report and is included at Appendix 1.4. Overall, it is concluded that, in terms of potential contamination risks, the Site is likely to be suitable for its proposed use (i.e. development and use for a solar farm, BESS and associated cable route). No likely significant risks or effects have been identified that would require assessment through the preparation of an ES chapter.
Human Health	 PINS agreed that this aspect can be scoped out of the ES provided adequate signposting between aspect chapters is included. Reference to aspects which could affect human health are referenced in the following relevant technical chapters: Chapter 9: Access & Traffic Chapter 12: Climate Change Chapter 13: Glint Chapter 15: Socio-Economic Chapter 16: Air Quality
Waste	PINS noted that solar developments are typically considered to be c. 40-year developments with panel degradation cited as a limiting factor on project lifespan. On that basis, PINS considered it is likely that all panels would have to be replaced at least once during the operational life of the project, as at the time of Scoping an operational life of 60 years was stated. However, since the Scoping opinion was issued the operational life of the Proposed Development has been reduced to 40 years.

Table 4.1 – Summary of Aspects Initially Proposed to be Scoped Out



TOPIC	SUMMARY
	It is assumed that all components will need to be replaced during the lifetime of the project and this PEIR has considered the potential impacts associated with equipment replacement.
	All replaced components will be recycled or disposed of in accordance with good practice and market conditions at that time.
	A Decommissioning Environmental Management Plan (DEMP) and Waste and Recycling Strategy will be prepared and provided alongside the ES.
Accidents & Disasters	PINS agreed that measures set out in the Scoping Report to be included in the project design will ensure that the Proposed Development will not result in likely significant effects as a result of an accident or man-made or natural disaster. PINS agreed that this aspect can be scoped out subject to potential risks being assessed in the ES in relevant related chapters and any relevant mitigation being secured through relevant management plans.
	 Potential risks in relation to accidents and disasters are considered within the following chapters and reports, which did not identify likely effects of the Proposed Development which could result in an accident or disaster: Chapter 9: Access & Traffic Chapter 11: Water Resources & Flood Risk Chapter 12: Climate Change Chapter 13: Glint Appendix 1.4: Ground Conditions Desk Study
Electric, Magnetic and Electromagnetic Fields (EMF)	PINS stated that given the uncertainty surrounding cabling design and proximity to receptors presented within the Scoping Report, the ES should address the risks to human health arising from EMF to the extent that it is relevant to the nature of the development.
	Following design evolution it is now proposed that the cable will be entirely underground, therefore it is not considered likely that significant effects will occur in relation to EMF.
Telecommunications, Television Reception and Utilities	PINS agreed to scope this matter out subject to the ES setting out the findings of the desk-based assessment and how this has been taken into account in the design to mitigate impacts.
	Desk based assessment of existing utilities have been undertaken and are informing the development design. This will include consideration of utilities within the cable corridor, to the extent that information is available. Further information will be set out within the ES.



ΤΟΡΙΟ	SUMMARY
Wind Microclimate	PINS agreed that due to the nature and characteristics of the Proposed Development significant effects are unlikely and therefore this aspect can be scoped out of the ES.
Daylight, Sunlight and Overshadowing	PINS agreed that due to the characteristics of the Proposed Development and its scale and massing, the Proposed Development will not cause changes to daylight or sunlight visibility, or cause overshadowing, and this aspect can be scoped out.

Removal of Beacon Fen South

- 4.2.10 As set out within Chapter 3, at the Scoping stage the Proposed Development also included a second solar panel array area, to the south-west of Helpringham. This area was referred to as Beacon Fen South (BFS). BFS has now been removed (see Chapter 3 for further information).
- 4.2.11 This change was communicated to the relevant bodies, including PINS, LCC and NKDC, and the public.
- 4.2.12 As a result of the removal of BFS from the Proposed Development, the Applicant re-appraised the proposed grid connection cable route from that presented in Scoping (that contemplated the Solar Array area on BFN and BFS) to ensure the most appropriate corridor was taken forward for the refined development. The Cable Route Corridor presented within this PEIR reflects the output of that further analysis and shows a revised route, outside of the area initially identified for the cable route corridor in Scoping.
- 4.2.13 The Cable Route Corridor (assessed in this PEIR) covers an area of similar land use to that contained within the Scoping Report; however, it is much narrower and has fewer sensitive receptors located within or adjacent to its boundary. It is not considered that the change in location impacts on any of the conclusions set out in the Scoping Opinion (with no new topics requiring to be scoped in or changes to the underlying methodology which will inform the EIA); however, the Applicant has undertaken engagement directly with relevant consultation bodies on the proposed methodology and scope to the EIA and this is reflected in each technical chapter to the PEIR.

4.3 Rochdale Envelope

- 4.3.1 The 'Rochdale Envelope' approach is employed where details of a development have not been confirmed when an assessment is undertaken or an application is submitted, and flexibility is sought to address uncertainty.
- 4.3.2 Advice Note 9 (Paragraph 1.3) acknowledges the requirement for flexibility whilst balancing this against the need to undertake a robust assessment of potential significant effects. Flexibility is required in relation to a number of the components to the Proposed Development, particularly due to the continuing evolution in the technology for solar PV and BESS. As such, a parameters-based approach has been taken to this EIA, in accordance with the Rochdale Envelope principles set out in Advice Note 9.



- 4.3.3 Use of the Rochdale Envelope approach involves assessing the maximum (and/or, where relevant, minimum) parameters for the design elements which require flexibility to be retained. This ensures the 'worst-case' parameter is considered within the technical assessment, to allow for a robust, and worst-case, assessment of the potential impacts of the Proposed Development.
- 4.3.4 The parameters currently being considered are set out within Chapter 2 and are sufficiently detailed to allow for the assessment of a robust 'worst-case' scenario. Chapter 2 sets out where there are multiple options under consideration, and each technical chapter has considered the option which represents a 'worst-case' relevant to the topic area under consideration.
- 4.3.5 Elements of the Proposed Development's design are anticipated to be refined following consultation, allowing for a greater level of certainty in relation to those aspects of the design parameters for the ES in support of the DCO Application. For matters where flexibility is still required, the parameters based approach and assessment of a worst-case scenario will be undertaken. These parameters will be clearly defined within the ES, ensuring compliance with the EIA Regulations.

4.4 General Assessment Approach

- 4.4.1 Each technical assessment considers guidance relevant to the topic under consideration, however all technical chapters broadly follow the below approach, ensuring the information required by Schedule 4 of the EIA Regulations is included:
 - Baseline Conditions: A description of the relevant aspects of the current state of the environment and how such environment would be expected to evolve in the absence of the Proposed Development, enabling identification of sensitive receptors that could be affected by the Proposed Development.
 - Assessment Methodology: A description of the methods used within each subject area to assess potential impacts, explaining any assumptions or modifications to the general impact assessment methodology described here with reference to relevant technical guidance.
 - Limitations: Description of any limitations identified to the assessment including the absence of information or other limitations (e.g. restriction on access) that have constrained the assessment in any way.
 - Embedded Mitigation: A description of mitigation measures that have been incorporated within the Proposed Development in order to design out (e.g. through the adoption of best practice or design principles) potential adverse effects prior to impact assessment.
 - Assessment of Effects: Undertaken in accordance with the methodology set out in order to identify the potential effects of the Proposed Development, including Embedded Mitigation but prior to additional Mitigation.
 - Mitigation: Identification of any additional mitigation measures that would be used to reduce potential impacts to acceptable levels.



- Residual Effects: Identification of residual environmental impacts and their significance after mitigation is applied.
- Cumulative Effects: Identification of cumulative effects including intercumulative and/or intra-cumulative, as appropriate.
- Monitoring: Description of the level of monitoring that could be necessary, over a defined period, to ensure that mitigation measures remain appropriate and maintain actual impacts within acceptable limits.

Identification of Potential Impacts

- 4.4.2 Where quantitative techniques can be used, this approach will be adopted to determine the magnitude of the potential impact as a consequence of the Proposed Development. Where quantitative techniques are not possible, qualitative techniques (with expert judgement) will be used to define the magnitude of the potential impact. Where predictions are subject to a degree of uncertainty, this is explained within each technical chapter, together with any assumptions on which they are based.
- 4.4.3 The four attributes that are applied to determine the impact are:
 - Direction
 - Positive Impact An impact that is considered to provide a net benefit to the receptor.
 - Adverse Impact An impact that is considered to negatively affect the receptor and may require measures to mitigate its effects.
 - Duration
 - Short-term Impact An impact that would occur during construction activities.
 - Long-term Impact A permanent impact from operation of the development after mitigation measures have been applied.

4.5 Significance Criteria

- 4.5.1 The existing baseline conditions will be determined through review and consideration of information obtained by desk-based studies and onsite surveys / monitoring.
- 4.5.2 The terms impact and effect are often used interchangeably but, within the context of the environmental studies considered in the EIA / ES, these terms have specific meanings.
- 4.5.3 The term 'impact' is used with reference to changes in a particular aspect of the environment that can be considered attributable to the development. Where possible, the degree of change is quantified. The assessment of the level of these changes (i.e., magnitude of change) to the baseline is based on the magnitude of the impact and the sensitivity of the receptor to that change.



- 4.5.4 The term 'effect' relates to the implication of changes in the baseline conditions that have been established for a particular receptor. This effect can be concluded to be Significant or Not Significant depending upon the level of effect.
- 4.5.5 Thus, impacts are a measurement of the change upon aspects of the environment, from the baseline condition, as a consequence of the development; the effect is the significance of the change and is binary (i.e. Significant or Not Significant).
- 4.5.6 Each technical chapter sets out their relevant assessment methodology that has been used to identify the level of effect, and confirmed what level of effect constitutes a Significant effect in accordance with any relevant technical standards and guidance. A summary of the general process is provided below.

Receptor Sensitivity

4.5.7 Receptor sensitivity has been defined based on a similar scale to the one presented in Table 4.2 below, with further details or amendments relevant to the topic area under consideration where relevant.

SENSITIVITY OF RECEPTOR	DESCRIPTION OF RECEPTOR
Low	Low importance; abundant; local importance or scale; resilient to change; potential for substitution within the local area.
Medium	Low to medium importance; relatively abundant; regional importance or scale; reasonably resilient to change; potential for substitution.
High	Medium to high importance; relatively rare; national importance or scale; fragile and susceptible to change; limited potential for substitution.
Very High	Very high importance; extremely rare; international importance or scale; very fragile; highly susceptible to change; very limited potential for substitution.

Table 4.2 - Receptor Sensitivity

Note: the scale combines the characteristics of the receptor together with its geographic extent.

Magnitude of Change

4.5.8 Magnitude of change has been defined based on a similar scale to the one presented in Table 4.3 below, with further details or amendments relevant to the topic area and associated practice and guidance where relevant.

MAGNITUDE OF CHANGE	DESCRIPTION OF CHANGE		
Negligible	Minimal detectable changes in baseline resource. Changes are either of short duration or infrequent, such that		
	direct control is not required to manage potential impact.		
Low	Detectable change to the baseline conditions or resource. During construction and operations there would be ongoing change in the underlying characteristics or quality of the baseline conditions.		

Table 4.3 - Magnitude of Change Scale



MAGNITUDE OF CHANGE	DESCRIPTION OF CHANGE
Medium	Degree of change is such that loss of, or adverse alteration to, the baseline conditions of a specific environmental resource would occur. Post-development characteristics or quality would be partially changed during construction and operational phases.
High	Degree of change is such that total loss of, or alteration to, the baseline conditions of a specific resource would occur. Post-development characteristics or quality would be fundamentally and irreversibly changed.

Defining Significance

4.5.9 Using the qualitative descriptions from the Receptor Sensitivity and Magnitude of Change, scales have been mapped to produce a matrix (Table 4.4) that can be used to define the level of effect.

RECEPTOR SENSITIVITY	MAGNITUDE OF CHANGE			
SENSITIVITT	Negligible	Low	Medium	High
Low	Negligible	Negligible	Minor	Minor
Medium	Negligible	Minor	Moderate	Moderate
High	Minor	Moderate	Major	Major
Very High	Minor	Moderate	Major	Major

Table 4.4 - Level of Effect Matrix

- 4.5.10 The magnitude of change and resulting effects can be adverse or beneficial in nature.
- 4.5.11 The level of the impact can then be used to determine whether the effect is significant; generally impacts rated as greater than moderate are considered to have a significant effect however this is defined within each technical chapter dependent on topic specific requirements.
- 4.5.12 More detailed definitions of the levels of significance are shown in Table 4.5, below. It should be noted that some guidance (for instance, in respect of landscape character and visual amenity), advises against the rigid use of such matrices and that professional judgement should be applied in arriving at a conclusion about significance.

SCALE OF IMPACT	DESCRIPTION OF IMPACT (SENSITIVITY AND MAGNITUDE)	SIGNIFICANCE OF EFFECTS
Negligible	Receptor not concerned or altered by a particular activity; nearly indistinguishable from natural background variations.	Not Significant
Minor	Well within accepted limits or standards; noticeable impact on receptor, but sufficiently small so as not to be of concern.	Not Significant
Greater than Moderate	Within accepted limits or standards, but close to reaching the threshold; high magnitude	Significant

Table 4.5 - Significance of Effects



SCALE OF IMPACT	DESCRIPTION OF IMPACT (SENSITIVITY AND MAGNITUDE)	SIGNIFICANCE OF EFFECTS
	changes on relatively insensitive receptors;	
	low magnitude changes to highly to very highly	
	sensitive receptors.	
	Accepted limits or standards are exceeded;	
Major	high to moderate magnitude changes affecting	Significant
	highly to very highly sensitive receptors.	

Mitigation Measures and Residual Impacts

- 4.5.13 In general, adverse effects rated as significant will be mitigated in order to reduce the level of significance of the residual (post-mitigation) impact. Monitoring measures may also need to be defined to assess the efficacy of the mitigation.
- 4.5.14 The potential impacts, with mitigation incorporated, are assessed to determine the level of residual effects as a result of the site activities. The residual effect is determined as a result of the reduction in level of the impact together with a risk analysis based on any monitoring programme targeted to audit the impact.
- 4.5.15 At this PEI stage mitigation measures are still being developed. An Indicative Mitigation Layout (Figure 1.5) is included in this PEIR in order to illustrate the initial measures identified. This Mitigation Layout will be refined following further assessment work and feedback during consultation and will then form the basis of the assessments within the ES (as embedded mitigation).
- 4.5.16 The ES will include a mitigation schedule clearly setting out the measures proposed to achieve the residual effects identified within the ES, and how these are to be secured through the DCO application.

4.6 Cumulative Effects

- 4.6.1 In accordance with Schedule 4 of the EIA Regulations, an assessment of potential cumulative effects associated with the Proposed Development has been considered. Cumulative impacts can take two forms; intra-cumulative and inter-cumulative, and the consideration of both will be considered within the ES:
 - Intra-cumulative (effect interactions) being those impacts that occur as a result of the combination of multiple environmental impacts (from the development in isolation) on a single receptor; or
 - Inter-cumulative being those impacts that occur as a result of the development in combination with other development(s).

Intra-Cumulative Effects

4.6.2 The assessment of intra-cumulative effects considers the interactions between residual impacts of the Proposed Development (in isolation) likely to be experienced for each type of receptor and assesses the significance of these cumulative effects. Effects have been tabulated against receptor groups in order to identify potential significant intra-cumulative effects. The methodology for this has adopted the following principles:



- Residual effects, post-mitigation, have been taken as the basis for the assessment, on the assumption that mitigation measures set out will be secured in the DCO and put in place as part of the Proposed Development. Negligible residual effects have been excluded from the assessment on the basis that they have an imperceptible impact on the environment and so are unlikely to contribute any significant adverse intra-cumulative effects.
- The sensitivity of receptors and magnitude of impacts has been identified and combined in order to determine the potential for significant adverse cumulative effects.
- Additional mitigation, if required, has been developed to address any significant intra-cumulative effects.

Inter-Cumulative Effects

4.6.3 The assessment of inter-cumulative effects is being undertaken with regard to the Planning Inspectorate Advice Note Seventeen: 'Cumulative effects assessment relevant to nationally significant infrastructure projects', and paragraphs 107 and 108 of 'Planning Act 2008: Guidance on the pre-application process', both of which recommend a staged approach.

Stage 1: Establishing the long list

- 4.6.4 The Zone of Influence (ZOI), within which it is considered that significant effects in combination with other developments are possible, was identified during Scoping.
- 4.6.5 The Scoping Report proposed that the ZOI comprise a 5km distance out from the application boundary as this aligns with or exceeds the study area for the majority of environmental assessments. However, feedback within the Scoping Opinion identified the risk of potential significant effects in combination with other NSIPs within Lincolnshire due to the scale of such schemes.
- 4.6.6 As such, a long list has been created which includes the following:
 - Within the ZOI of the county of Lincolnshire, in relation to DCO developments:
 - o any which have been consented and are under construction;
 - any which have been consented and not yet under construction;
 - \circ submitted applications that are not yet determined; and
 - any proposed applications that are not yet submitted, but which have been notified to PINS as proposed projects and appearing on the PINS portal.
 - Within the ZOI of 5km from the Site boundaries:

Application type criteria

 Full planning application (major development) – for at least 10 new dwellings / over 1,000 sqm additional floorspace,



including; Outline planning applications; Reserved matters applications; and Hybrid applications;

- Lawful development certificate (major development);
- EIA Scoping;
- Overhead line consent;
- Development identified in the relevant Development Plans (and emerging Development Plans);
- Development identified in other plans and programmes (as appropriate) which set the framework for future development consents/approvals, where such development is reasonably likely to come forward; and
- Any other major projects of interest.

Application status criteria

- Development currently under construction;
- Approved applications within the past five years which have not yet been implemented;
- Submitted applications not yet determined; and
- Refused applications, subject to appeal procedures not yet determined.
- 4.6.7 The long list of schemes is included at Appendix 4.1.

Stage 2: Establishing the short list

- 4.6.8 The long list was then reviewed in order to ensure the cumulative assessment is proportionate and that only schemes which are likely to result in significant effects in cumulation with the Proposed Development are considered. The criteria against which the long list has been reviewed comprises:
 - Scale and nature of other developments, informed by definitions of major development and EIA screening thresholds;
 - Overlap in temporal scope of construction and operational phases;
 - Geographical overlap in the ZOI of other developments with the Proposed Development; and
 - Sensitivity and extent of common receptors.
- 4.6.9 The review of the long list has been used to establish a short list of schemes considered within this PEIR. The shortlist of schemes considered (as of November 2023) is included at Appendix 4.2. The location of the shortlist schemes are illustrated on Figures 4.1 and 4.2.
- 4.6.10 The shortlist is still being reviewed and updated to ensure schemes that come forward during preparation of the application are considered. Reviews of the



shortlist will be agreed with the local planning authorities. The final shortlist will be provided within the ES.

Stage 3: Information gathering

- 4.6.11 Information on each of the developments on the short list has been collected to inform the EIA. Information includes the following:
 - Proposed design and location information;
 - Proposed programme of demolition, construction, operation and/or decommissioning;
 - Environmental assessments that set out baseline data and effects arising from 'other development'; and
 - Any other information of relevance.

Stage 4: Assessment

- 4.6.12 An assessment of the potential cumulative effects of the Proposed Development with the short list of other developments will be undertaken. The assessment will be proportionate, with regard to the certainty of information available on other developments. Where significant cumulative effects are only likely to arise in relation to one environmental aspect area, the assessment will focus on that issue only. The criteria for determining the significance of any cumulative effect will be based upon:
 - The duration of effect, i.e. will it be temporary or permanent;
 - The extent of effect, e.g. the geographical area of an effect;
 - The type of effect;
 - The frequency of the effect;
 - The 'value' and resilience of the receptor affected; and
 - The likely success of mitigation.
- 4.6.13 At this PEI stage, preliminary cumulative assessments have been undertaken to the extent possible at this stage. Further assessment of cumulative effects, where relevant, will be provided within the ES.

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