

# **Cumulative Effects – the impossible question...**

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# ...RIDDLES IN THE DARK

PERSPECTIVE OF AN EX-STATUTORY ADVISOR  
AND AN EIA PRACTITIONER

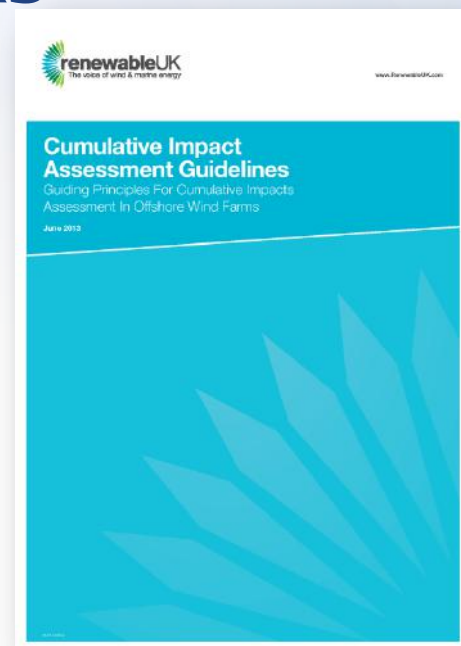
# Cumulative Impact Assessment (CIA) – Context

- **Poor cousin to EIA**
  - Yet CIA possibly more important to get right
- **Frustration**
  - Not being done optimally
  - Significant hurdle
- **Despite legal requirements for CIA >20 years, still a**
  - Lack of clarity over the cumulative impacts that need to be considered by developers and their consultants
  - Lack of strategic guidance on the appropriate scope, scale, and methodologies for such assessments



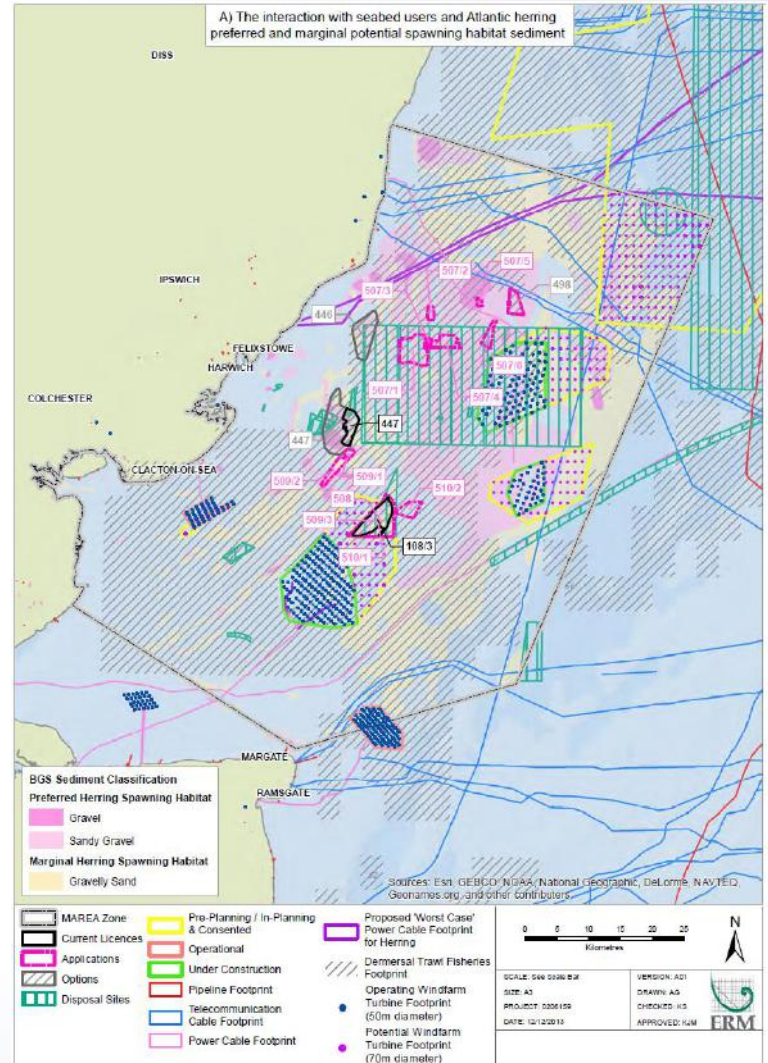
# CIA – Stumbling Blocks

- **Disparate guidance and inconsistent processes**
  - *Ad hoc*
  - **No focus on cross-sectoral approach**
    - Multiple sectors, multiple pressures
  - **Few cross-disciplinary linkages**
    - Multiple receptors, multiple scales
  - **No central agency**
    - Multiple Regulators, multiple remits, multiple approaches
  - **Industry sector-led development of processes**
    - Marine Aggregate Regional Environmental Assessments (MAREAs)
    - Round 3 Zone Appraisal and Planning (ZAP)
    - Renewable UK's CIA guidelines



# CIA – Stumbling Blocks

- Shifting and variable scope and scale
  - Perception of *'re-inventing the wheel'*
  - Sector-specific regional assessments
    - Receptors extend outside these areas
  - *'Silent/invisible'* sectors - Outside the EIA/Habs Dir legislation
    - Generally large-scale footprints
    - Requirement to take into account – how?



# CIA – Stumbling Blocks

- **Accessing/maintenance of appropriate data**
  - Other foreseeable plans and projects
  - Mapping of sensitive environmental receptors
  - Footprints in areas subject to multiple developments
- **Access to project-specific information across multiple projects**
  - Advisors/Regulators party to data that other practitioners unable to access
  - Frustration for all
  - Tendency to not *'sign off'* CIA





# Thoughts – A Way Forward

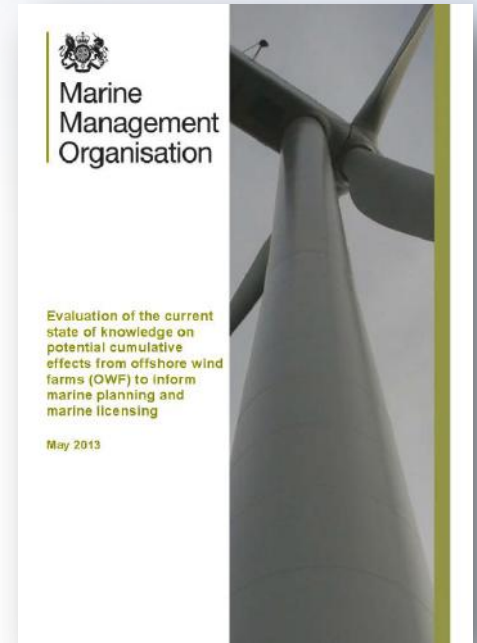
Reduce the high level of subjectivity

- Adopt an incremental approach

- Evaluate and build on existing CIAs

e.g. Marine Aggregate Coastal Impact Studies

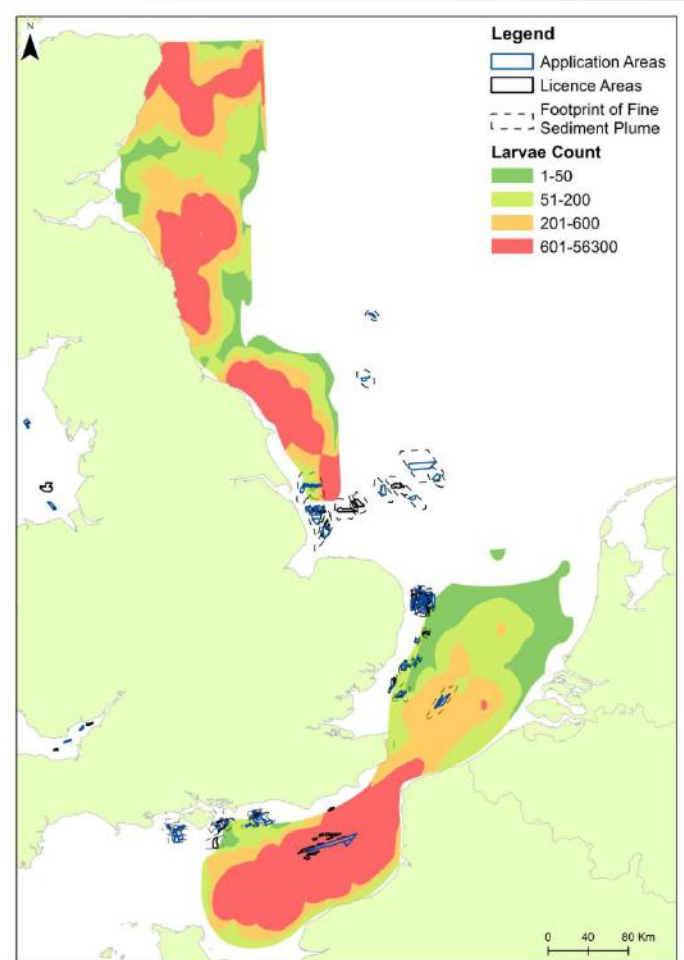
- Advisors/Regulators to validate
- Across all sectors
- Clarity of *'assessment envelopes'* at scoping phase



# Thoughts – A Way Forward

## Centralise and standardise data – consistent variables

- **Extent of Receptors**
  - **Mobile species**
    - Ranges
    - Habitat space
- **Sensitivity thresholds**
- **Repository of extant and foreseeable projects**
  - Related to suitable *'high pressure'* areas/regions
- **Compendium of possible synergistic effects**
  - **Cross-sectoral pressure sources/pathways**



MarineSpace Ltd, ABPmer Ltd, ERM Ltd, Fugro EMU Ltd and Marine Ecological Surveys Ltd, 2013. *Environmental Effect Pathways between Marine Aggregate Application Areas and Atlantic Herring Potential Spawning Habitat: Regional Cumulative Impact Assessments*. Version 1.0. A report for the British Marine Aggregates Producers Association.

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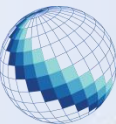




# Thoughts – A Way Forward

*“WHAT HAS IT GOT IN ITS POCKETSES?”*

- This should no longer be *“too difficult to do”*
  - Leadership from Regulators and Advisors required at regional sea scale
  - Build upon considerable expertise
  - Consideration of uncertainty – managing risk; links to
  - Strategic mitigation
    - Across projects/activities potentially resulting in significant cumulative effects
- Integrated management at a regional sea scale should already provide a platform
- Delivery of effective CIA requires centralised and joined-up responsibility
  - Holistic vision, primary thinking, direction, leadership



# Thankyou

*ALIVE WITHOUT BREATH,  
AS COLD AS DEATH;  
NEVER THIRSTY, EVER DRINKING,  
ALL IN MAIL NEVER CLINKING.*

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