ENVIRONMENTAL STATEMENT – VOLUME 1 – CHAPTER 4 EIA METHODOLOGY

Drax Bioenergy with Carbon Capture and Storage

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, 5(2)(a)

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4. EIA METHODOLOGY

4.1. INTRODUCTION

4.1.1. This chapter sets out the overall approach to the environmental impact assessment (EIA) for the Proposed Scheme. A more detailed overview of the methodology adopted for each environmental topic is provided within the respective chapters of this Environmental Statement (ES). The approach to the assessment has been informed by current best practice guidance, including:

a. Advice Note Three: EIA Notification and Consultation (PINS, 2017);

b. Advice Note Seven: Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements (PINS, 2020);

c. Advice Note Nine: Rochdale Envelope (PINS, 2018); and

d. Advice Note Seventeen: Cumulative Effects Assessment relevant to nationally significant infrastructure projects (PINS, 2019).

4.1.2. This ES contains the information specified in Regulation 14(2)(a)-(f) and Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") as set out in Table 1.1 of **Chapter 1 (Introduction)** (document reference 6.1.1).

4.2. SCOPING

4.2.1. An **EIA Scoping Opinion** (**Appendix 1.2** (document reference 6.3.1.2) was received by the Applicant from the Planning Inspectorate (PINS) on behalf of the Secretary of State (SoS) on 26 February 2021, including formal responses from Statutory Consultees. The **EIA Scoping Opinion** has been taken into account in the preparation of this ES and further details on this are provided in **Appendix 4.2** (**Scoping Opinion Responses)** (document reference 6.1.4.2).

4.2.2. The following topics have been scoped into this EIA:

a. Traffic and Transport

b. Air Quality

c. Noise and Vibration

d. Ecology

e. Landscape and Visual Impact

f. Heritage

g. Ground Conditions

h. Water Environment

i. Materials and Waste

j. Climate Resilience

k. Greenhouse Gases

l. Population and Health

m. Major Accidents and Disasters

n. Cumulative Effects

4.3. CONSULTATION

4.3.1. As part of the EIA process, consultation is ongoing with a range of Statutory Consultees and Non-Statutory Consultees, to date these have included:

a. North Yorkshire County Council (NYCC);

b. Selby District Council (SDC);

c. East Riding of Yorkshire Council;

d. Newland Parish Council;

e. Drax Parish Council;

f. Doncaster Metropolitan Borough Council;

g. National Grid Electricity Systems Operator;

h. National Grid Ventures;

i. Environment Agency;

j. Natural England;

k. Historic England;

l. National Highways (formerly Highways England);

m. Canal and River Trust;

n. Yorkshire Water;

o. Selby Area Internal Drainage Board;

p. HSE;

q. UK Health Security Agency.

4.3.2. The purpose of consultation with Statutory Consultees is to brief them on the Proposed Scheme, seek feedback on the Proposed Scheme and the proposed approach to the assessment and to obtain baseline data. A summary of consultation undertaken to date in relation to the EIA for the Proposed Scheme is included in each of the topic chapters of this ES.

STATUTORY CONSULTATION

4.3.3. The DCO process requires Statutory Consultation to be undertaken prior to the submission of an application for a DCO. Under the Planning Act 2008, there are three elements to statutory consultation as follows:

a. Section 42 sets out that consultation should be undertaken with prescribed consultees, local authorities, landowners, others with interests in land and people who may be able to make a relevant claim in connection with the Proposed Scheme.

b. Section 47 sets out that consultation with the local community in accordance with the Statement of Community Consultation (SoCC) should be undertaken.

c. Section 48 is a requirement to publish statutory notices of the proposed application for a DCO in local and national newspapers and the London Gazette. The section 48 notice is also required to be served on prescribed consultees.

4.3.4. Statutory Consultation took place between 1 November and 12 December 2021 under Sections 42, 47 and 48 of the Planning Act 2008. A Preliminary Environmental Information Report (PEIR) (WSP , 2021) and PEIR Non-Technical Summary were produced to support the Statutory Consultation. The PEIR was produced to help consultees take an informed view of the likely significant environmental effects of the Proposed Scheme.

4.3.5. Responses received by the Applicant from statutory consultees, the local community and the general public are detailed further in the **Consultation Report** (document reference 5.1) and responses have been considered in the preparation of this ES.

4.4. CONSIDERATION OF ALTERNATIVES

4.4.1. Regulation 14(2)(d) of the EIA Regulations states that an ES should include:

> "a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment."

4.4.2. Further detail around the consideration of alternatives is set out in **Chapter 3 (Consideration of Alternatives)** (document reference 6.1.3).

4.4.3. At this stage some options remain in relation to the design of the Proposed Scheme, as detailed in **Chapter 2 (Site and Project Description)** of this ES, such as options for the modification of the existing water pre-treatment plant and the construction programme. For the purposes of this ES each environmental topic has assumed a reasonable worst case in their assessment, and this is detailed within each of the topic chapters.

4.5. TEMPORAL SCOPE

4.5.1. The assessment scenarios considered within this EIA are as follows:

a. Existing baseline (without the Proposed Scheme) – the year that baseline data has been collected;

b. Future baseline (without the Proposed Scheme);

c. Construction of the Proposed Scheme as detailed in **Chapter 2 (Site and Project Description) Section 2.3** (document reference 6.1.2). **Chapters 5 to 17** of this ES (ES Volume I, document reference 6.1) identify and assess a "reasonable worst case" for their topic and this is detailed within each chapter;

d. Operation and maintenance of the Proposed Scheme. As detailed in **Chapter 2 (Site and Project Description) Section 2.4**. the period that the Proposed Scheme would operate and be maintained, "the design life", is assumed to be 25 years. Where there is optionality for the Proposed Scheme, **Chapters 5 to 17** of

this ES (ES Volume I, document reference 6.1) identify and assess a “reasonable worst case” for their topic this is detailed within each chapter;

e. Decommissioning of the Proposed Scheme at the end of its “design life”.

4.6. BASELINE CONDITIONS

4.6.1. The study area and approach used to establish baseline conditions for each environmental topic is set out within its respective chapter (see **Chapters 5 – 17**). Baseline conditions are determined using the results of investigations which may include site surveys and desk-based data searches.

EXISTING BASELINE

4.6.2. For the purposes of the assessment the “existing baseline” is 2021 – 2022 as this is the date during which the baseline studies for the EIA have been undertaken. Where baseline data has been used outside this period this is explained within the respective topic chapters.

4.6.3. For the EIA for the Proposed Scheme, it has been assumed that the baseline conditions at the Drax Power Station will include four existing Drax units running on biomass without the implementation of carbon capture and storage. The two remaining coal units (units 5 and 6) stopped generating electricity commercially in March 2021 and will cease operations entirely prior to works to construct the Proposed Scheme commencing.

ESTABLISHING FUTURE BASELINE CONDITIONS

4.6.4. This ES includes an outline of the likely evolution of the existing baseline without implementation of the Proposed Scheme based on available information and knowledge.

4.6.5. It is assumed for the purpose of the ES that the future baseline will include four existing Drax units running on biomass without the implementation of carbon capture and storage. It should be noted that other Zero Carbon Humber projects are addressed within **Chapter 18 (Cumulative Effects)** (document reference 6.1.18) of this ES.

4.6.6. Furthermore, as described in **Chapter 2 (Site and Project Description)** (document reference 6.1.2), the Applicant has full planning permission for the demolition of the redundant Flue Gas Desulphurisation (FGD) Plant and associated restoration works at Drax Power Station (2020/0994/FULM). The decommissioning and demolition works of Absorber Units 4, 5 and 6 are scheduled to take place prior to the start of the construction of the Proposed Scheme, therefore forming part of the baseline, whilst the demolition of Absorber Units 1, 2 and 3 are assumed to take place following the completion of the Proposed Scheme and as such they form part of the baseline, while their demolition is considered as a cumulative project during operation.

4.6.7. Drax has the benefit of a Development Consent Order (DCO) (The Drax Power (Generating Stations) Order 2019), which allows Drax to repower up to two of the existing coal-powered generating units with new gas turbines that can operate in both combined cycle and open cycle modes ("Drax Repower"). The new units would have a new combined capacity of up to 3,600 MW in combined cycle mode (1,800 MW each). The Applicant has publicly stated that it has no plans to progress Drax Repower, and therefore Drax Repower is not included in the future baseline for the purposes of this assessment.

4.7. ROCHDALE ENVELOPE

4.7.1. The design of the Proposed Scheme will continue to be progressed and there will be a need to continue refining the design up until the detailed design stage given uncertainties around technology suppliers and advancement, requiring a certain level of flexibility to be maintained. Therefore, in line with PINS Advice Note Nine (Rochdale Envelope) (PINS, 2018) a parameter-based approach (the 'Rochdale Envelope' approach) has been adopted to define the envelopes within which the construction and operation of the Proposed Scheme will be undertaken. These parameters are defined within Schedule 15 of the **draft DCO** (document reference 3.1) and are detailed within **Section 2.6** of **Chapter 2 (Site and Project Description)** of this ES. Furthermore, the **Land Plans** (document reference 2.2) identify each of the work's packages and the maximum of the area in which they can be carried out. The parameters approach presents the maximum envelope within which the built development may be undertaken, and an assessment of the parameters ensures that a "reasonable worst case" is assessed in the EIA. As such the environmental effects associated with the Proposed Scheme when it is constructed, operated, maintained and decommissioned would be no worse than those reported within this ES.

4.8. STUDY AREA

4.8.1. Study areas have been defined individually for each environmental topic, taking account relevant guidance, the geographic scope of the potential impacts relevant to that topic or of the information required to assess those impacts. The study areas are described within **Chapters 5-18** of this ES (ES Volume 1, document reference 6.1).

4.9. ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS

4.9.1. The assessment of the Likely Significant Effects (LSEs) for the Proposed Scheme has been undertaken both before and after secondary mitigation measures (see **paragraph 4.11.1(b)** below) have been applied. Effects after mitigation are referred to as 'residual effects'.

4.9.2. The assessment takes into the account the following:

a. Likelihood of occurrence;

b. Geographical extent;

c. Adherence of the proposals to legislation and planning policy;

d. Adherence of the proposals to international, national and local standards;

e. Sensitivity of the receiving environment or other receptor;

f. Value of the affected resource;

g. Whether the effect is temporary or permanent;

h. Whether the effect is short, medium, or long-term in duration;

i. Whether the effect is reversible or irreversible;

j. Inter-relationship between effects (both cumulatively and in terms of potential effect interactions); and

k. The outputs of stakeholder and public engagement.

ASSESSMENT OF SIGNIFICANCE

4.9.3. The methodology for assessing the significance of an effect varies between environmental factors but in principle, has been based on the environmental value (sensitivity) of a receptor and the magnitude of impact on baseline conditions.

4.9.4. The Design Manual for Roads and Bridges LA104 (Highways England, 2020) identifies the magnitude of impact on a scale of major, moderate, minor, negligible and no change. Environmental value (sensitivity) is allocated a scale of very high, high, medium, low and negligible. The significance of each effect is then assessed by combining the magnitude of impact and the sensitivity (or value / importance) of the receptor or receiving environment using the matrix in **Table 4.1** which is reproduced from Table 3.8.1 in LA104.

4.9.5. Each of the technical chapters provides further detail on specific guidance that has been followed, the specific criteria that have been used in determining significance and whether the assessment has also been informed by professional judgement.

Table 4.1 – Matrix for Determining Significance of Effects

		Magnitude of Impact (degree of change)				
		No change	**Negligible**	**Minor**	**Moderate**	**Major**
Environmental value (sensitivity)	**Very high**	Neutral	Slight	Moderate or large	Large or very large	Very large
	High	Neutral	Slight	Slight or moderate	Moderate or large	Large or very large
	Medium	Neutral	Neutral or slight	Slight	Moderate	Moderate or large
	Low	Neutral	Neutral or slight	Neutral or slight	Slight	Slight or moderate
	Negligible	Neutral	Neutral	Neutral or slight	Neutral or slight	Slight

4.9.6. When a range has been included in **Table 4.1**, professional judgment has been used to define the significance.

4.9.7. Only moderate, large or very large effects are considered to be significant, unless otherwise detailed within the topic chapters.

4.9.8. Tables which summarise the likely significant effects are provided in the topic chapters. These tables outline sensitive receptors, mitigation measures and residual effects. A distinction is made between direct and indirect; short, medium and long-term; permanent and temporary; and beneficial and adverse effects.

4.9.9. Inter-project Cumulative Effects of other approved projects and intra-project combined effects are considered in **Chapter 18 (Cumulative Effects)**.

4.10. APPROACH TO MITIGATION

4.10.1. Mitigation can be classified as three types – primary (inherent), secondary (foreseeable) and tertiary (inexorable) (IEMA, 2015) and can be defined as follows:

a. Primary mitigation – modifications to the location or design made during the pre-application phase that are an inherent part of the Proposed Scheme. These measures are treated as an inherent part of the Proposed Scheme and are set out in **Chapter 2 (Site and Project Description)**;

b. Secondary mitigation – actions that will require further activity in order to achieve the anticipated outcome e.g., measures to be implemented at detailed design or measures to be included in the CEMP. Secondary mitigation focuses on reducing the significance or likelihood of adverse effects. The effectiveness of such

measures are assessed within the ES and appropriate mitigation is secured by the DCO or other suitable mechanism; and

c. Tertiary mitigation – actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements. Examples include applying emissions controls to meet legislative requirements. These measures are treated as an inherent part of the Proposed Scheme.

4.10.2. Primary mitigation for the Proposed Scheme has been identified as part of an iterative design process and is described in **Chapter 2 (Site and Project Description)** and **Chapter 3 (Consideration of Alternatives)**. The preliminary assessment of the likely significant environmental effects has been undertaken with the assumption that primary and tertiary mitigation will be implemented.

4.10.3. Following the preliminary assessment of the likely significant effects of the Proposed Scheme, any further mitigation measures (secondary mitigation) are identified and described within the individual topic chapters. These mitigation measures would further reduce an adverse effect or enhance a beneficial one. The assessment of likely significant effects is then carried out taking into account the identified secondary mitigation measures to identify the “residual” environmental effects.

4.10.4. In addition, a **Register of Environmental Actions and Commitments (REAC)** (document reference 6.5) has been produced which collates the mitigation relied upon in the EIA in order to manage the environmental impacts of the Proposed Scheme. The mitigation measures within the **REAC** are proposed to be secured via requirements in the **draft DCO**, or by various management plans or strategies, which are themselves secured via DCO requirements.

4.11. MONITORING

4.11.1. The EIA Regulations require, where appropriate, the monitoring of potential significant adverse effects. Where monitoring arrangements are proposed as part of the mitigation set out, this has been detailed within each of the technical chapters of this ES and within the **REAC**. The results of monitoring would be shared with the relevant statutory bodies as appropriate, for example to demonstrate compliance with consents and permits.

4.12. IN-COMBINATION CLIMATE CHANGE IMPACTS

4.12.1. An in-combination climate change impact assessment has been included within each topic chapter to consider the extent to which climate change may alter the effects which have already been identified through the assessment. This has been carried out in line with IEMA guidance (IEMA, 2020) and the methodology is detailed in **Chapter 14 (Climate Change Resilience)** (document reference 6.1.14).

4.13. ASSESSMENT OF TRANSBOUNDARY IMPACTS

4.13.1. Regulation 32 of the EIA Regulations sets out the procedural duties required where the SoS deems that an NSIP is likely to have significant effects on the environment in an EEA State; or where an EEA State deems that its environment is likely to be significantly affected by an NSIP. Further guidance is provided in PINS Advice Note Twelve (PINS, 2020). The assessments undertaken as part of this ES have determined that no transboundary impacts are likely to be experienced as a result of the Proposed Scheme.

4.14. STRUCTURE OF THE ES

4.14.1. This ES has been structured as follows:

a. Volume 1 Main Text:

i. **Chapter 1 (Introduction)** (document reference 6.1.1);
ii. **Chapter 2 (Site and Project Description)** (document reference 6.1.2);
iii. **Chapter 3 (Consideration of Alternatives)** (document reference 6.1.3);
iv. **Chapter 4 (EIA Methodology)** (document reference 6.1.4);
v. **Chapter 5 (Traffic and Transport)** (document reference 6.1.5);
vi. **Chapter 6 (Air Quality)** (document reference 6.1.6);
vii. **Chapter 7 (Noise and Vibration)** (document reference 6.1.7);
viii. **Chapter 8 (Ecology)** (document reference 6.1.8);
ix. **Chapter 9 (Landscape and Visual Amenity)** (document reference 6.1.9);
x. **Chapter 10 (Heritage)** (document reference 6.1.10);
xi. **Chapter 11 (Ground Conditions)** (document reference 6.1.11);
xii. **Chapter 12 (Water Environment)** (document reference 6.1.12);
xiii. **Chapter 13 (Materials and Waste)** (document reference 6.1.13);
xiv. **Chapter 14 (Climate Change Resilience)** (document reference 6.1.14);
xv. **Chapter 15 (Greenhouse Gases)** (document reference 6.1.15);
xvi. **Chapter 16 (Population, Health and Socioeconomics)** (document reference 6.1.16);
xvii. **Chapter 17 (Major Accidents and Disasters)** (document reference 6.1.17);
xviii. **Chapter 18 (Cumulative Effects)** (document reference 6.1.18); and
xix. **Chapter 19 (Summary of Likely Significant Effects)** (document reference 6.1.19).

b. Volume 2 – **Figures** (document references 6.2.1.1 to 6.2.18.1);

c. Volume 3 – **Technical Appendices** (document references 6.3.1.1 to 6.3.18.5);

d. Volume 4 - **Non-Technical Summary (NTS)** (document reference 6.4).

4.14.2. This ES should be read alongside the **Glossary** (document reference 1.7) for the Application, which defines key terminology and abbreviations. The **Glossary** only capitalises terms which are proper nouns or project-specific terms.

4.15. ADDITIONAL DOCUMENTATION

4.15.1. A number of additional application documents which do not form part of this ES but have been referred to and / or relied upon within the ES have been submitted as part of the DCO Application as follows:

a. **Register of Environmental Actions and Commitments** (document reference 6.5);
b. **Outline Landscape and Biodiversity Strategy (OLBS)** (document reference 6.6);
c. **Draft Lighting Strategy** (document reference 6.7);
d. **Habitats Regulations Assessment** (document reference 6.8);
e. **Design Framework Document** (document reference 6.9); and
f. **Biodiversity Net Gain Assessment** (document reference 6.10).

REGISTER OF ENVIRONMENTAL ACTIONS AND COMMITMENTS

4.15.2. The **REAC** details all those measures identified within **Chapters 5-18** of this ES which have been identified in order to mitigate potential significant environmental effects. The mitigation measures within the **REAC** are proposed to be secured via several mechanisms, including requirements in the **draft DCO**, and by various management plans or strategies, which are themselves secured via DCO requirements.

OUTLINE LANDSCAPE AND BIODIVERSITY STRATEGY

4.15.3. The **Outline Landscape Biodiversity Strategy (OLBS)** sets out the mitigation, design, management and high-level maintenance requirements for areas of planting for the Proposed Scheme. The **OLBS** outlines the measures which would mitigate the likely significant effects of the Proposed Scheme on landscape and biodiversity features and enhance the value of such features, in accordance with relevant national and local planning policies.

DRAFT LIGHTING STRATEGY

4.15.4. A **Draft Lighting Strategy** has been produced in accordance with the Institution of Lighting Professionals (ILP) PLG04 ‘Guidance on Undertaking Environmental Lighting Impact Assessments’. The lighting strategy reviews the existing baseline lighting conditions at Drax Power Station Site and immediate surrounding area, describes the likely types of lighting required for the Proposed Scheme, identifies sensitive receptors and carries out an assessment of the likely significant effects including identifying any mitigation measures required to reduce potential impacts.

HABITATS REGULATIONS ASSESSMENT

4.15.5. The overarching aim of the **Habitats Regulations Assessment** (HRA) is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan, either in isolation and / or in-combination with other plans or projects, could lead to adverse effects on the integrity of an International site. Given the proximity of the Proposed Scheme to several International Sites, an **HRA** has been prepared alongside the ES. This will provide the consenting authority with sufficient information to decide whether the Proposed Scheme will lead to LSE on International Sites. Where LSE have been identified, a detailed assessment has been undertaken to provide the Secretary of State with sufficient information to assess whether the proposals could result in adverse effects on the integrity of relevant International sites.

4.15.6. Whilst the over-arching objectives of EIA and HRA are similar, their scope, level of detail and terminology vary. As such, these processes have been undertaken separately. However, the scope presented within the ES has been developed to consider the needs of these processes to ensure a coordinated assessment. Further detail is provided in **Chapter 8 (Ecology)** (document reference 6.1.8).

DESIGN FRAMEWORK DOCUMENT

4.15.7. The **Design Framework**, produced in consultation with NYCC and SDC, provides a holistic vision of how the Drax Power Station Site should evolve in terms of its relationship with the wider landscape and describes the wider strategic aims for Drax Power Station. It also demonstrates how the Proposed Scheme design (by forming an integral component of the Power Station fabric) fits within this overall context.

4.15.8. The **Framework** illustrates where principles of good design have been incorporated into the Proposed Scheme in compliance with legislative policy / guidance and provides further explanatory support for the primary mitigation measures as referenced in **Chapter 2 (Site and Project Description)**. It also details strategic design parameters and outlines the approach to good design practice, and design principles relating to Drax Power Station as a whole. The **Design Framework** is intended to be used as a basis of reference for the detailed design phases of the Proposed Scheme, including any changes to Drax Power Station in the future. The **Design Framework** is intended to be applied to the whole of Drax Power Station now, and in the future; as such, it includes elements that do not apply to the Proposed Scheme.

BIODIVERSITY NET GAIN ASSESSMENT

4.15.9. Following industry best practice guidance, the **Biodiversity Net Gain** assessment, submitted alongside the ES, has analysed the habitats to be retained, enhanced, created or lost within the Site. It also identifies whether habitat compensation is required and demonstrates biodiversity benefits resulting from the Proposed Scheme. Further detail is provided in **Chapter 8 (Ecology)**.

4.16. ASSESSMENT OF HEAT AND RADIATION

4.16.1. Schedule 4 of the EIA Regulations requires a consideration of the likely significant effects of the Proposed Scheme resulting from the emission of heat, light and radiation, however, no significant sources of such emissions are anticipated. PINS agreed that an assessment of the effects from radiation could be scoped out and an assessment of radiation has therefore not been carried out.

4.16.2. In their Scoping Opinion PINS did not agree that heat and light could be scoped out unless further information could be provided. To satisfy this request, further detail around heat in the context of the Proposed Scheme is provided in **Chapter 2 (Site and Project Description)** to demonstrate that no significant sources of such emissions are anticipated. Furthermore, a combined heat and power (CHP) Statement has not been prepared on the basis that insufficient heat would be produced from the Proposed Scheme; the EA agreed with this approach to the CHP Statement during the pre-application discussions, on the basis that the Proposed Scheme does not include any new, additional, combustion processes above and beyond that already permitted.

4.16.3. In relation to lighting, a **Draft Lighting Strategy** has also prepared and submitted alongside the ES and has been informed by a lighting baseline survey which was undertaken for Drax Repower and which is still representative of the current lighting conditions on site.

4.16.4. It should be noted that the effects of heatwaves, extreme weather and other external hazards are considered within **Chapter 17 (Major Accidents and Disasters)** (document reference 6.1.17).

4.17. RELEVANT EXPERTISE

4.17.1. In line with Regulation 14(4)(a) of the EIA Regulations, the ES has been prepared by a suitably qualified project team. Details of the team and qualifications are set out in **Appendix 4.1 (Relevant Expertise and Competency)** (document reference 6.3.4.1), as required by Regulation 14(4)(b).

4.17.2. The Institute of Environmental Management and Assessment (IEMA) has awarded WSP the EIA Quality Mark in recognition of our commitment to excellence in EIA activities. We have continued to maintain this following annual examination in relation to our products, staff, innovation and promotion of EIA within the industry. Furthermore, each chapter of the ES has been prepared by an individual suitably qualified with regard to their technical discipline.

REFERENCES

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