

Environment Agency online consultation: <https://consult.environment-agency.gov.uk/portal>

Streamlining permitting of hydropower projects in England and Wales: consultation document

Response submitted: 2nd July, 2010

Questions

1. Do you agree we should develop a single decision process for our permissions as defined in Box 1? What do you think it should or should not include?

n/a

2. How can stakeholder participation in our decision-making be improved?

We are pleased to see that the Environment Agency has recognised the interests of historic environment professionals (archaeological advisers and conservation officers are mentioned in Section 4.2) in the consultation process for decisions on small-scale hydropower projects. In parts of the country, we have already welcomed the principle of sensitive development of small-scale hydropower projects, particularly where they may provide a revenue stream for the restoration or upkeep of heritage assets.

However, we wish to emphasise the importance of early engagement with local authorities and/or English Heritage when adaptation involves historic structures such as weirs or water mills. Where removal or modification of these is proposed, discussion of the options should be undertaken with English Heritage or local authority historic environment professionals at the initial stages of the project to ensure the fabric and setting of the heritage asset are not unnecessarily compromised. Whilst some of these structures may already have been identified and designated as nationally important through listing or scheduling, others will also have historic significance and each case should be assessed individually before works take place, ideally at the pre-application stage site meeting in accordance with the good practice principles (Section 4.3).

3. Do you agree with our good practice principles in handling hydropower applications?

n/a

4. How can we improve co-ordination between permitting and the planning permission process?

n/a

5. What do you consider to be the key environmental issues for small-scale hydropower that require further evidence to understand and mitigate?

n/a

6. What aspects of the technical guidance in the Good Practice Guide do you think are missing or need further development?

We understand that the current Good Practice Guide (GPG) was developed for application on existing impoundments (weirs). As indicated in our response to Question 2, a proportion of these are likely to be of historic interest, whether designated or otherwise. Sympathetic and sensitive development can be achieved through early engagement with historic environment professionals during the initial stages of option appraisal for project development. It would, therefore, be extremely helpful to developers, to identify this additional aspect of environmental appraisal in the GPG, flagging the appropriate timing and nature of engagement that will ensure development opportunities are handled efficiently. English Heritage would welcome the opportunity to support the Environment Agency in the incorporation of this component to the second edition of GPG which we understand is currently under development.

7. How can the provision of information in support of applications be simplified?

n/a

8. How much monitoring should operators be required to carry out after licensing to demonstrate their hydropower scheme is not having a detrimental environmental impact?

n/a

9. How much monitoring should operators be required to carry out after licensing to demonstrate their hydropower scheme is not having a detrimental environmental impact?

n/a

10. What additional help should we provide specifically for community groups and individuals to help them through the application process?

n/a

11. Please identify and define low environmental risk hydropower scenarios that might become common and so justify making specific arrangements.

n/a

12. What do you think are the implications of Article 4.7 of the Water Framework Directive for hydropower projects? Do you think it would be a helpful simplification if ecological, or perhaps energy, thresholds are provided in guidance? If so, how would you define and justify them?

n/a

13. Do you agree that we should develop catchment level strategies for hydropower? If so, what do you think catchment strategies should aim to deliver and what environmental and other impacts should they consider? Should they seek to identify sites that are suitable and not suitable for hydropower?

n/a

14. How could the legal framework for permitting hydropower be changed to streamline the permitting process without compromise on environmental protection?

n/a

15. What additional proposals do you have to speed up the permitting process whilst protecting and enhancing the environment?

n/a

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