



Robin Clarke
OPM
252b Gray's Inn Road
London
WC1X 8XG

e-mail: energynpsconsultation@opm.co.uk

Unit 6B Manor Farm Business Centre
Gussage St Michael
Wimborne, Dorset, BH21 5HT
Tel: 01258 840934
Email: info@british-hydro.org
www.british-hydro.org

22nd February 2010

Dear Mr Clarke,

CONSULTATION ON DRAFT NATIONAL PLANNING STATEMENTS FOR ENERGY INFRASTRUCTURE

I am responding on behalf of the British Hydropower Association (BHA) to the consultation on draft national planning statements for energy infrastructure.

The BHA is the trade association for the UK hydropower industry. With around 150 members, the Association represents a wide range of interests: consulting engineering, design, manufacture, investment and operation, and specialist service providers. The BHA represents generators from small owner-operators to large UK and international companies.

The interests of the BHA relate only to hydropower. The Association welcomes the National Planning Statements (NPSs) as a step towards achieving key energy policy goals of addressing climate change, and securing energy supplies and affordable energy prices by providing a favourable climate for investment in new energy infrastructure. The BHA recognises the need for massive investment, £200 billion, in electricity generating infrastructure to replace ageing power plant and to build a low carbon electricity industry. The BHA supports NPSs as a basis for decision making by the Infrastructure Planning Commission.

We note that although the NPSs relate to projects over 50MW, projects generating electricity from hydropower are not referred to in EN-3, the draft NPS for renewable energy infrastructure. The BHA recognises that there may be few remaining opportunities for the construction of large-scale hydropower projects but we are aware of proposals for at least two projects in Scotland where the consultation document notes that energy policy is generally a reserved matter under the Scotland Act 1998 (1.24). How will large-scale hydropower be covered?

Yours sincerely,

A handwritten signature in black ink that reads "Adrian Abbott". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Adrian Abbott
Policy & Consultations Manager

CONSULTATIONS QUESTIONS

Chapter 2: Draft Overarching Energy NPS (EN-1)

1. Do you think that the Government should formally approve ('designate') the draft Overarching Energy National Policy Statement?

Yes. For the successful deployment of the electricity generating investment the UK needs a clear, stable long-term policy framework is needed. The BHA believes the National Policy Statements are a firm basis establishing this framework.

2. Does the draft Overarching Energy National Policy Statement provide the Infrastructure Planning Commission with the information it needs to reach a decision on whether or not to grant development consent?

In general yes. However, the BHA is concerned that the statement in Section 1.6: 'The AoS does not identify any additional, more stringent requirements for applications (in terms of identifying, assessing or mitigating the effects) in the National Policy Statement, nor does it identify any requirements that have been relaxed. The development of new infrastructure, at the scale and speed required to meet the current need, may affect ecology as development may occur on previously undeveloped land. The Appraisal of Sustainability concludes that the significance of these effects remain uncertain at the strategic level' is unclear. How are these uncertainties going to be handled or mediated?

3. Does the draft Overarching Energy National Policy Statement provide suitable information to the Infrastructure Planning Commission on the Government's energy and climate policy?

The BHA feels that the Government's climate change policy could be more firmly stated.

4. Does the draft Overarching Energy National Policy Statement provide suitable direction to the Infrastructure Planning Commission on the need and urgency for new energy infrastructure?

Yes

5. Do the assessment principles in the draft Overarching Energy National Policy Statement provide suitable direction to the Infrastructure Planning Commission to inform its decision-making?

Yes

6. Does the draft Overarching Energy National Policy Statement appropriately cover the generic impacts of new energy infrastructure and potential options to mitigate those impacts?

Yes

7. Do you have any comments on any aspect of the draft Overarching Energy National Policy Statement not covered by the previous questions?

No

Chapter 3: Draft NPSs for Fossil Fuels, Renewables, Gas Supply and Gas and Oil Pipelines, and Electricity Networks (EN 2-5)

Questions 8-11

The BHA's interests are only in hydropower and EN-3 does not refer to hydropower. However, the Associations believes that in principle the Government should formally designate the draft NPSs which provide the Infrastructure Planning Commission with the information it needs to reach a decision. The BHA believes that the draft National Policy Statements cover the impacts of the specified types of new energy infrastructure covered in them, and potential options to mitigate them

Chapter 4: Appraisal of Sustainability and Habitats Regulations Assessment for EN 1-5

12-15

The BHA's interests are only in hydropower and as EN-3 does not refer to hydropower we do not have any comments to make on this section.

**Chapter 5: Draft Nuclear NPS (EN-6) and associated documents
16-26**

The BHA does not have expertise in this technology area.

**Chapter 6: Impact Assessment and other questions
27-29**

The BHA does not have any comments on the questions in this chapter.