



British Hydropower Association,
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Manor Farm Business Centre,
Gussage St Michael,
Dorset
BH21 5HT

Smart Energy Team,
Department for Business, Energy and Industrial Strategy,
1 Victoria Street,
London,
SW1H 0ET

3rd December 2019

Dear Sir or Madam,

Response to follow up consultation on proposals regarding the planning system for electricity storage

The British Hydropower Association (BHA) is the leading trade membership association solely representing the interests of the UK hydropower industry (from micro to large scale) and its associated stakeholders in the wider community, both in the UK and overseas.

The BHA welcomes the opportunity to respond to this consultation and supports the ambition of removing barriers to future development of electricity storage.

The BHA does not agree that there should be a blanket exclusion of all pumped hydropower schemes over 50MW from the proposal, though we support the principle of the new preferred policy.

The BHA does agree that for large-scale greenfield pumped hydro schemes, the NSIP regime is the most appropriate consenting route. However, the total exclusion of all pumped hydro schemes over 50 MW from the proposed carve out would put smaller schemes, which have minimal planning impact, at a commercial disadvantage when compared to other forms of storage technologies.

BEIS's rationale for retaining the 50MW threshold in the case of pumped hydro storage wrongly assumes that all future developments will be at the large scale with the accompanying potential planning impacts.

Innovations in pumped hydro storage technology, which will see the possibility of future schemes at a smaller scale than existing large pumped hydro sites and without any planning and planning impact, are not currently considered in BEIS's proposed policy change.

The BHA suggests that the threshold for pumped hydro storage should be increased to 200MW. This corresponds to levels at which planning impacts would not be dissimilar to the impact of other types of storage at the same scale. There would still be the option at <200MW capacities of using the NSIP regime if the developer believes this is the most appropriate route for any project.

The BHA answers to the consultation questions are as follows -

1. Do you agree that it is appropriate to carve out electricity storage, except pumped hydro from the NSIP regime in England and Wales?

BHA agrees that it is appropriate to carve out electricity storage from the NSIP regime and is in general agreement with the statement in the consultation that for large-scale greenfield pumped hydro schemes that the NSIP regime is the most appropriate route for consent.

However, we do not agree with the blanket exclusion of all pumped hydro schemes over 50 MW from the proposed carve out, as this would put the smaller type of potential schemes, which have minimal planning impacts, at a distinct commercial disadvantage in comparison with other storage technologies. Hence the BHA suggests that the threshold for pumped hydro storage should be increased to 200MW

There is potential for medium sized pumped hydro storage schemes which repurpose and utilise redundant mine and quarry sites as is currently the case, particularly in Scotland and in Wales. These types of scheme offer numerous environmental net gains as the projects have the capacity to breathe new life into these types of sites. One of our members is developing the Glenmuckloch scheme which is an excellent example of re-using abandoned mines and quarries.

There are also innovations in pumped hydro storage technology which can lead to increasing efficiency and decreased environmental footprint. A BHA member, RheEnergise, is developing a pumped storage technology which uses a more dense fluid than water which can increase the power capability by c2.5 times. This technology was presented at the BHA Hydro Network conference in late June this year.

2. Do you agree that we should carve out electricity storage, except pumped hydro, from the offshore planning regime (NSIP and s.36 consent)?

The BHA agrees with the proposal to carve out electricity storage from the offshore planning regime.

3. Do you have any comments on the draft legislation or transitional arrangements?

The BHA proposes amendments to the legislation reflecting our member's views as detailed previously, on a revised position regarding the proposed threshold for pumped hydro storage.

Yours sincerely

Simon Hamlyn

**Simon Hamlyn
Chief Executive Officer**