

Response ID ANON-V8FE-5A66-U

Submitted to **Environment Agency charge proposals from April 2018**

Submitted on **2018-01-18 16:22:40**

Your details

Your email address

Email:

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Section 1 - About this consultation

Section 2 - Setting our charges

Section 2.4 - Supplementary time and materials charges

1 Do you agree with the proposals to charge fixed charges where we have greater certainty over costs and time and materials in other instances?

No

If not, please explain why:

A. The proposed fixed charges take no account of scale of project

The Regulator's Code specifically states that "Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity."

The fee structure charges by nature of activity but there is almost no differentiation on the scale of the activity, nor the scale of the overall project, thereby hugely penalising small-scale developments undertaken largely by individuals and SMEs.

B. Supplementary charging opens the door to abuse when determining complex cases

If, in complex cases, an applicant is expected to pay Environment Agency costs as well as their own, there becomes a clear incentive for any 'resistant' EA personnel to enter into a dialogue of attrition, dragging out a determination period until the applicant's costs become so high that they result in a withdrawal. Therefore there needs to be a capping system to ensure that applicants have continued access to fair regulation.

Section 2.8 - Transition from existing scheme to proposed scheme

2 Please tell us if you have any comments about the proposed transitional arrangements outlined in section 2.8.

Comments:

We are very concerned about the proposed transitional arrangements, despite the acknowledged scale of this review, the Agency has initiated a consultation of reduced length, issued only 4 months before the proposed implementation date.

Para §2.8 is entitled 'Transition', but then confirms that there is no transition at all. The changes simply come into force straight away at full cost i.e. it is a cliff edge.

This ultra-short timescale with proposed massive price increases (>1000% for hydropower schemes) and no transition period is simply unfair to all projects which have already allocated budgets for consenting their scheme. This is especially true for community projects which operate from fixed grants and cannot simply find another £2000 from somewhere.

Section 3 - Environmental Permitting Regulatory approach

3 Please tell us if you have any comments about the common regulatory framework outlined in section 3.1.

Comments:

Our comments and proposed amendments are summarised under 4 headings, A to D.

A. The commercial approach is not appropriate for government regulation

The EA is seeking to move its charges from an 'Application Fee' to 'Full Cost Recovery', whilst still charging 100% of the fee up-front. The latter commercial approach implies that the customer is paying for

- (a) The appropriate level of expertise
- (b) A minimum quality of service,
- and
- (c) Will receive full value for money.

But a commercial approach must allow for choice and competition (in this case there is neither), and full payment only on completion of the work.

BHA Proposed Amendments

If the EA is to take a commercial approach, then it is essential that, structured into the regulations, are the right of the applicant to:

1. Assess the expertise of those appointed by the Agency, and reject their appointment if they lack the experience to expedite the tasks knowledgeably and efficiently

(for example, the Agency has a long record of sending unnecessarily large groups of staff on site visits, or staff who simply do not have the knowledge or experience to assess compliance: this is even more unacceptable if the applicant is also the one who is paying for their time).

2. Assess value for money by having access to staff timesheets, to understand who has been working on their permit, when, and with what output.
3. Be guaranteed a minimum quality of service, including a set schedule for determining their permit.
4. Claim compensation if the Agency does not meet the set standards and timescales.
5. Only pay the full fee once the service has actually been provided.

B. The fee structure will lead to double-counting where other permissions have been involved.

Para 3.1 bullet 8 states that "people should pay for the regulatory service they receive."

In the case of every newly-consented hydropower scheme, the calculations underpinning the Permit fee for a 'new flood risk activity' will include double-counting of assessment work that has already been done by the EA at abstraction licensing and planning, and therefore cannot reflect the 'actual costs to be incurred by the Agency ' and will lead to applicants paying twice for a service they have already received.

For a hydropower project, this critical issue can be summarised as follows:

- Every hydropower scheme has to have an EA Abstraction License and/or Impoundment License.
- This license contains the design drawings (covering intake and outfall arrangements) and there is usually a condition requiring a qualified engineer to certify that the scheme has been built as designed. This is also then checked during an EA compliance visit.
- License approval also requires the fisheries, ecology and geomorphology impacts of the scheme to have been assessed and mitigated as necessary.
- Every new hydropower scheme also requires Planning Permission. An essential supporting document is the Flood Risk Assessment.
- The detail of the planning application is assessed by the EA as a statutory consultee, who have to approve the Flood Risk Assessment before planning consent can be granted.
- The Flood Risk Permit (FRP) is the final consent and is therefore the 3rd time that the same scheme will pass through the EA.
- The FRP will typically have attached to it:
 1. the scheme drawings
 2. the flood risk assessment
 3. fisheries, ecology, geomorphology studies
 4. the outline Construction Methodology, also covering temporary works (eg. cofferdams)
- Of these documents only the Construction Methodology could be new to the EA (it may have been included at Planning, but not always).
- It is therefore wholly inappropriate for a new hydro-scheme to be charged the full cost for a bespoke Flood Risk Permit, whose calculated fee presumes that the Agency has never seen the project before. In reality the Agency will have already assessed and approved the large majority of the technical and environmental details, including the design drawings and flood risk assessment, and staff will have already visited the site.
- The following text is noted from the Draft Order para 5:

"Abatement of charges: The Agency may, by notice to the person liable for the charge, waive or reduce any charge specified in this Scheme if it considers it to be significantly disproportionate in a particular case, having regard to the actual costs and expenses incurred or to be incurred by the Agency in relation to a particular application or subsistence period."
- This 'abatement' needs to be recognised and structured into the charging for a 'consented hydropower scheme', otherwise every single hydropower project will have to apply separately for this clause to be activated.

- We also note that Section 42 of the 1995 Environment Act requires that:

"The Secretary of State shall, in determining whether or not to approve the charging scheme, ... have regard to ensuring that the amounts recovered by the Agency are the amounts which, taking one year with another, need to be recovered by the Agency to meet such of the costs and expenses which it incurs in carrying out its functions".

This implies that the Secretary of State should not approve a scheme which has double-counting built into its charging structure.

BHA Proposed Amendments

1. Standard rule permit

We therefore propose that, if a hydro scheme has already been granted an Abstraction or Impoundment License plus Planning Permission (with an approved Flood Risk Assessment), then the project should come under a 'standard rule permit' and should not be required to obtain a bespoke permit.

An alternative option would be to create a separate flood risk activity for a 'consented hydropower scheme', involving a much reduced fee.

2. Removal of the subsistence charge.

In addition, an EA compliance assessment will already be required (and budgeted) within the EA's supervision of the abstraction license. In practice, the Agency only visits a compliant hydropower scheme once after commissioning, regardless of how many separate EA permissions it holds. Therefore there should not be an additional subsistence charge for a Flood Risk Permit, since this would be double-charging.

C. The fee structure breaches the Regulator Code

The Regulator's Code specifically states that "Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity."

The fee structure charges by nature of activity but there is almost no differentiation on the scale of the activity, nor the scale of the overall project, thereby hugely penalising small-scale developments undertaken largely by individuals and SMEs.

D. 'Desirable' does not mean 'essential' or 'affordable'

Para 3.1 repeatedly refers to 'desired activities'. It never refers to 'essential' or 'necessary' activities, or 'the minimum required to comply with national legislation', or 'what the public can afford to pay'. No doubt the Agency would 'desire' to be able to fund a wide range of in-depth activities with a well-trained workforce to suit, as would all public agencies. But first there needs to be detailed scrutiny by an independent body of which Agency activities are essential, affordable and prioritised to protect the environment, before any increase in fee structure can be justified. No such information has been provided.

Section 4 - The model for the EPR charging scheme

4 We anticipate that there will be time saving for businesses if you no longer are required to complete an OPRA profile. Do you agree?

Not Applicable

If not, please explain why:

5 How much time do you think will be saved by not having to complete an OPRA profile as part of a permit application? (in hours)

Hours:

6 Who usually completes the OPRA profile that is required when applying for a waste, installations or mining waste permit?

Not applicable

If other, please specify:

7 How much time do you think will be saved by not having to annually review your OPRA profile? (in hours, per year)

(in hours, per year):

8 Who usually completes the annual review of your OPRA profile?

Not applicable

If other, please specify:

Section 4.2.1 - Pre-application advice across all EPR regimes and sectors

9 Do you agree with the proposal to include only basic pre-application advice in all of our application charges?

Yes

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

Section 4.3.1 - Discretionary enhanced pre-application advice service

10 Do you agree with the proposal for a discretionary enhanced pre-application advice service?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

Section 4.3.2 - Non-discretionary supplementary application charges

11 To recover our costs we intend to charge each time we review a waste recovery plan. Do you agree with this approach?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

12 Do you agree with our proposals to retain a proportion of the fee to cover costs associated with processing poor applications?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

13 Do you agree with the proposals to recovering additional costs for determining public interest applications through time and materials?

Not applicable

Do you agree with the proposals to recovering additional costs for determining public interest applications through time and materials?:

14 Do you agree with the fixed charge approach for application amendments during determination?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

15 Do you agree with our proposal to recover costs of determining permits using novel technologies through time and materials charging?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

16 Do you agree with our proposals to charge for further information requests not covered within the baseline charge?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

17 Do you agree with our proposal to use the new application fee as the basis for variation and surrender charges?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

18 Do you agree with our approach for discounting batch transfers to a single operator at the same time?

Not applicable

If not, please explain why:

Section 4.4 - Application for multiple activities under one permit

19 Do you agree with the approach we have used to cover our costs associated with determining permits at multi-activity sites?

No

If not, please explain why :

The Environment Agency formally in minutes of a meeting on 30/11/17, advised the Hydro Sector Group that additional activities would be charged at 25% of the full rate, not 50% as stated.

'Multiple activities' should also apply to cross-over activities with other licences, with a 0% rate applying for identical work so as to avoid double-charging e.g. if the Agency has already approved a Flood Risk Assessment at planning stage, and nothing has changed, then this element should be charged at 0% for the Flood Risk Permit.

Section 4.6 - Supplementary subsistence charges (compliance stage)

20 Please tell us if you have any comments about the approach to annual subsistence charging outlined in sections 4.5 and 4.6.

Comments:

Subsistence charging must not apply if the applicant is having a compliance check via a different licence e.g. an abstraction licence

This is referred to previously in this response and is an unacceptable case of double counting again.

Every hydropower scheme has to have an EA Abstraction License and/or Impoundment License.

An EA compliance assessment will already be required (and budgeted) within the EA's supervision of the abstraction license. In practice, the Agency only visits a compliant hydropower scheme once after commissioning, regardless of how many separate EA permissions it holds. Therefore there should not be an additional subsistence charge for a Flood Risk Permit, since this would be double-charging.

Section 4.6.1 - Non-planned compliance work

21 Do you agree with our approach to charging for non-planned compliance work at permitted sites?

No

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

Bullet 3 -

'The additional work required, where under a permit condition the operator provides a submission explaining how they will meet the specific requirements, for our consideration and approval' is planned compliance work and therefore must not attract a fee

Section 4.6.2 - A new charge at the commencement of operations

22 Do you agree with the additional charge to cover extra regulation work in the first year of operation on an activity?

No

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

As with Q20, this charge must not apply if the applicant is having a compliance / post-commissioning check via a different licence e.g. an abstraction or impoundment licence, as will be required for all new hydropower schemes, otherwise there will be double-counting.

23 Do you agree that this first year charge should apply across all regimes and sectors under EPR or should it apply to some sectors only? (If so which sector/s?)

Some regimes and sectors only

If you have answered some regimes and sectors only, please tell us which regimes and sectors it should apply to:

Hydro must be excluded from this first year charge as hydro is already regulated under abstraction licence legislation and is therefore, yet again is double counting

Section 4.6.3 Pre operational and pre construction charges

24 Do you agree with our approach to charging for pre operational and pre construction?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

Section 4.7 - Subsistence charges for multi-activity operations

25 Please tell us if you have any comments regarding our proposed arrangements to recover regulatory costs at multi-activity sites?

Not applicable

If not, please explain why:

Section 4.8 - Permit Compliance

26 Do you agree with our interim arrangements for compliance rating outlined above?

Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work:

Section 4.9.1 - Flood and Coastal Risk Management

27 Do you agree with our proposals for flood and coastal risk management permitting charges?

Not applicable

If not, please explain why:

28 Please tell us if you have any comments in relation to our flood and coastal risk management proposals. In particular, do our proposals cover all activities you may undertake as an operator?

Comments:

Section 5.2.1 - Water Abstraction Proposals for 2018/19

52 Do you agree with the proposal to reduce the Thames regional charging area Standard Unit Charge?

Not Answered

If not, please explain why:

53 Do you agree with the proposal to remove the River Arle (northern and southern reaches) from the list of supported sources in the Abstraction charging scheme?

Not Answered

If not, please explain why:

Section 7 - Future developments

Section 7.2 - Forward Look for Abstraction Charges

68 Please tell us if you have any comments on our plans to review abstraction charges?

Comments:

HEP was removed from any form of abstraction charging by Act of Parliament because it returns 100% of the water without delay, without processing, and without a change in water quality other than increased oxygenation.

Any attempt to reintroduce charging will be vigorously opposed by the hydropower industry and licensed operators up and down the country - who are largely individuals and small businesses.

Subsistence Charging - If the Agency wants to pay a visit to 'check up' on operating hydropower schemes, then by all means do so in your own time, but do not attempt to charge for it.

Unless the Agency has evidence of environmental harm - in which case there are other means of recovering costs through fines - this is work that simply does not need doing. Section 3.1 bullet 3 says that the Agency has 'explored simplification opportunities to make activities more cost-beneficial'. The best way to reduce costs is to refrain from doing work that does not justify the cost involved.

Section 7.3.2 - Forward look for Navigation charges

69 What factors do you think should determine how we calculate the boat registration charge?

Comments:

70 We would appreciate your comments and feedback to help develop our proposals. What would you like to see included within a revised boat registration charges scheme?

Comments:

71 Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure)

Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure) - Channel dredging:

Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure) - Tree and vegetation clearance:

Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure) - Assisted passage (staff to operate locks):

Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure) - Routine patrolling by staff on patrol launches:

Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure) - Compliance and enforcement checks:

Please rate the following elements of service based on how important they are to you, using the key below? You can choose the same number more than once. (1 important/2 like/3 don't mind/4 could manage without/5 don't want or need/6 unsure) - Provision of facilities (eg moorings/water/refuse and sewage disposal):

Other - please specify:

72 Do you have any other comments on the above plans to review Navigation charges and the boat registration charges scheme?

Comments:

73 Would you be interested in attending a workshop to help us shape our new proposals? If so, please provide your contact details here:

Details:

Section 8 - Responding to this consultation

Section 8.1 - Comments on specific issues

74 Please give us any further comments on our proposals which have not been covered elsewhere in the questions, ie if none of the questions throughout the consultation have enabled you to raise further specific issues with these proposals please set them out here with any accompanying evidence.

Comments:

"The BHA fundamentally disagrees with this proposal.

Every hydropower scheme has to have an EA Abstraction License and/or Impoundment Licence which contains the design drawings (covering intake and outfall arrangements) and there is usually a condition requiring a qualified engineer to certify that the scheme has been built as designed. This is also then checked again during an EA compliance visit.

The license approval also requires the fisheries, ecology and geomorphology impacts of the scheme to have been assessed and mitigated as necessary.

Every new hydropower scheme also requires Planning Permission. An essential supporting document is the Flood Risk Assessment and the detail of the planning application is assessed by the EA as a statutory consultee, who have to approve the Flood Risk Assessment before planning consent can be granted.

The Flood Risk Permit (FRP) is the final consent and is therefore the 3rd time that the same scheme will pass through the EA for approval and checking.

The FRP will typically have attached to it:

1. The scheme drawings
2. The flood risk assessment
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Of these documents only the Construction Methodology could be new to the EA (it may have been included at Planning, but not always).

It is therefore wholly inappropriate for a new hydro-scheme to be charged the full cost for a bespoke Flood Risk Permit, whose calculated fee presumes that the Agency has never seen the project before. In reality the Agency will have already assessed and approved the large majority of the technical and environmental details, including the design drawings and flood risk assessment, and staff will have already visited the site.

The following text is noted from the Draft Order para 5:

"Abatement of charges: The Agency may, by notice to the person liable for the charge, waive or reduce any charge specified in this Scheme if it considers it to be significantly disproportionate in a particular case, having regard to the actual costs and expenses incurred or to be incurred by the Agency in relation to a particular application or subsistence period."

Clearly in the case of every newly-consented hydropower scheme, the calculations underpinning the Permit fee for a 'new flood risk activity' will include double-counting of assessment work that has already been done by the EA at licensing and planning, and therefore cannot reflect the 'actual costs to be incurred by the Agency'.

We also note that Section 42 of the 1995 Environment Act requires that:

"The Secretary of State shall, in determining whether or not to approve the charging scheme, ... have regard to ensuring that the amounts recovered by the Agency are the amounts which, taking one year with another, need to be recovered by the Agency to meet such of the costs and expenses which it incurs in carrying out its functions".

This implies that the Secretary of State should not approve a scheme which has double-counting built into the charging structure.

The Agency is seeking to move its charges from an 'Application Fee' to 'Full Cost Recovery', whilst still charging 100% of the fee up-front.

The latter commercial approach implies that the customer is paying for

- (a) The appropriate level of expertise
- (b) A minimum quality of service,
- and
- (c) Will receive full value for money.

But a commercial approach should allow for choice and competition (in this case there is neither), and full payment only on completion of the work.

Proposed Amendments

If the Agency is to take this approach, then it is essential that, structured into the regulations, are the right of the applicant to:

Assess the expertise of those appointed by the Agency, and reject their appointment if they lack the experience to expedite the tasks knowledgably and efficiently (for example, the Agency has a long record of sending unnecessarily large groups of staff on site visits: this is OK as long as the applicant is not the one who is paying for their time).

Assess value for money by having access to staff timesheets, to understand who has been working on their permit, when, and with what output.

Be guaranteed a minimum quality of service, including a set schedule for determining their permit.

Claim compensation if the Agency does not meet the set standards and timescales.

75 We would be interested in any analysis you have that suggests our proposals will influence the market conditions in your sector and whether there will be an impact on future investment decisions and on new entrants to the sector?

Please provide full evidence you have to support your answer along with any possible mitigating actions:

Market effects and barriers

1. Excessive Regulation and Cost Burden

The 2010 Conservative-led government promised to cut the red tape that is burdening industry and reducing productivity (the 'Red Tape Challenge').

Under the Red Tape Challenge, DEFRA's stated proposals of March 2012 [] covering Environmental Permitting committed the Environment Agency to "Make further efficiency improvements leading to reduced charges".

The 2017 Conservative Manifesto reiterated this commitment: "Effective regulation: Regulation is necessary for the proper ordering of any economy and to ensure that people – and their investments – are protected.

However, poor and excessive government regulation limits growth for no good reason. So we will continue to regulate more efficiently, saving £9 billion through the Red Tape Challenge and the One-In-Two-Out Rule. Reducing the cost of regulation is not just about reducing its volume.... "

In addition, the Regulator's Code specifically states that: "When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities, for example, by considering how they can best:

- Understand and minimise negative economic impacts of their regulatory activities;
- Minimise the costs of compliance for those they regulate;"

What is actually happening on the ground?

- The Flood Risk Permit has recently replaced Flood Defence Consent. This increased the bureaucracy (more forms, longer forms, more supporting information).
- And is now followed by the current proposal to hugely escalate the costs of this permit.

So both the regulatory volume and the cost to industry are increasing, in direct contradiction to the stated policy promised to the electorate.

2. Dis-proportionate effect on SMEs

The Regulator's Code specifically states that "Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity."

Market barriers are always raised against smaller enterprises if they have to pay the same regulatory costs for a small project as applies to a large project (unless these costs are insignificant).

The Agency made this mistake with the increase to a fixed £1500 fee for an abstraction license fee, whereas both NRW and SEPA chose to use a sliding scale based on project size. Planning Permission fees are also proportionate (based on footprint area). The Agency is now seeking to repeat their mistake with the enormous price increases proposed.

Example of dis-proportionate financial impact:

A 10kW domestic hydro project consented in 2019 may earn around £2500 per year from the value of its generation. A comparative 100kW hydro may earn £25,000 and will involve a much larger construction site.

The typical flood permit fee would currently be £210.

According to the proposed new charging structure, both projects would pay the same flat fee for the Flood Risk Permit (plus subsistence) of £2051, effectively adding nearly a whole year to the payback period for a domestic scheme, but only one month to that of the larger scheme.

Bearing in mind that one of the governing principles enshrined in the 1995 Environment Act is for the Agency to support the 'achievement of sustainable development', this is a totally disproportionate burden for a small renewable energy project, which will achieve the opposite effect by deterring sustainable development.

Proposed Amendments to mitigate Economic Impact and Market Barriers

- As stated above, a 'consented hydropower scheme' project should come under a 'standard rule permit', in order to reduce the cost and regulatory burden.
- Any significant increase in fees should take into account the scale of the development and the enterprise, so supporting individuals and SMEs to achieve sustainable development.

It is totally unreasonable, unfair and disingenuous to request 'analyses' and 'full evidence' from a 7-week consultation [originally a 5 week consultation] timed over the Christmas period. If the EA is serious about adopting an evidence-based approach, then these measures should be delayed until at least 2019 to allow appropriate industry and market assessments to be undertaken.

76 Do you have any analysis that suggests the charge increases will impact on SMEs in your sector? If so, which companies are most likely to be affected and what do you think will be the consequences?

Comments:

The Regulator's Code specifically states that "Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity."

Market barriers are always raised against smaller enterprises if they have to pay the same regulatory costs for a small project as applies to a large project (unless these costs are insignificant).

The Agency made this mistake with the increase to a fixed £1500 fee for an abstraction license fee, whereas both NRW and SEPA chose to use a sliding scale based on project size. Planning Permission fees are also proportionate (based on footprint area). The Agency is now seeking to repeat their mistake with the enormous price increases proposed.

- Any significant increase in fees should take into account the scale of the development and the enterprise, so supporting individuals and SMEs to achieve sustainable development.

Please provide any evidence/data along with any mitigating options:

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A 10kW domestic hydro project consented in 2019 may earn around £2500 per year from the value of its generation. A comparative 100kW hydro may earn £25,000 and will involve a much larger construction site.

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- Any significant increase in fees should take into account the scale of the development and the enterprise, so supporting individuals and SMEs to achieve sustainable development.

Section 8.3 - About you

77 Please select from the following options:

Responding on behalf of an organisation or group

If you're responding on behalf of an organisation or group, please tell us who your responding on behalf of and include its type, eg business, environmental group.:

The British Hydropower Association is the UK trade membership association that focuses solely on the demands of the hydropower sector actively representing the best interests of our 250 members in Scotland, England, Wales and Northern Ireland.

Membership of the British Hydropower Association is open to all generators, commercial organisations, academia, charities, community groups and individuals involved with or interest in hydropower. Membership is diverse, covering all sizes and types of hydropower from Pico to Pumped Storage

78 If you are responding on behalf of an organisation are you a Small or Medium-sized Enterprise (SME)?

Yes

79 You will receive an acknowledgement email and we will notify you when the consultation response document has been published.

Email:

simon.hamlyn@british-hydro.org

Section 8.4 - How we will use your information

80 Can we publish your response?We will only publish parts of your response that do not contain any personal information.

Yes

If no, please tell us why below as we will need to understand this when responding to any Freedom of Information requests: