

Responses to Sepa Consultation

Ref no in response doc	Topic (consultee nos in brackets)	Consultee no.	no.	%
11	rural socio-economic benefits and carbon reduction impact of small schemes have not been taken into account	2 8 9 10 14 15 16 18 22 24 26 27 29 32 40 49	16	29
1	some terms eg 'deterioration' (4), water body'(17), 'watercourse' (17), 'impacted' (17), 'significantly reduced' (6,21) 'natural barrier to fish' (21) need for increased hof in <100kw schemes unsupported (47)/are not defined, nor are there realistic measures to determine them; use of existing weirs (32)classification of sites as 'good' 'medium' and 'poor' is crude and subjective (4), or unclear (23); efficiency and optimisation (31)	4 6 13 17 21 23 28 30 32 37 41 45 46 50 54	15	27
14	encouraging the development of hydropower in 'degraded' sites is not acceptable; against WFD policy of improving degraded sites	12 21 23 30 36 38 39 41 42 45 46 50 54	13	24
23	goes further than / is not in line with Ministerial statement esp addition of 500kw limit (47) not joinedup thinking (49)	8 25 28 29 31 33 35 39 40 42 47 49 53	13	24
9	no supporting data: widespread lack of knowledge about aquatic species abundance, distribution and population dynamics and factors constraining sustainability of resources; research needed no scientific basis (35)	4 25 27 29 31 33 35 39 42 47 49 53	12	22
3	the classification into < and >100kw schemes is arbitrary and unjustified	8 10 11 22 24 25 27 47 48 49 52	11	20
4	<100kw schemes differ hugely in themselves; rules can't be applied to all small schemes: case-by-case analysis is required	4 11 12 17 28 29 36 44 47 49 51	11	20
8	measures are covered by other legislation: the SEPA guidance does not refer to guidance produced by other bodies such as SNH, aspects of WFD, English EA, German system, RTPI, other SEPAS guidance esp RM34 (18, 33), NPA SPG (20) EIA (28) EU's Renewable Energy Directive 2009 (33)	3 7 8 13 19 20 24 29 49 55	9	16
18	flow measures only one factor in fish habitat and migration; refs for this in 35	21 35 39 40 41 42 50 53 54	9	16
16	guidance seems biased against <100kw schemes (against river conservation, 35)	17 18 27 32 33 34 47 49	8	15
17	need for 1.75gwh per 500m / >6% slope arbitrary, should be checked case-by-case, most existing schemes don't meet these criteria	17 32 33 34 40 45 47 51	8	15
29	hands off flows too small, shd be dictated by ecology of river (51) too stringent (52) shd not be fixed frequency (54)	35 39 42 45 51 52 53 54	8	15
27	opposition of one type of green power (hydro) with another (wind) is unhelpful and irrelevant	29 31 32 33 34 47	6	11
6	large schemes are more damaging to the environment than small ones yet the stringent measures apply only to small schemes	4 6 15 20 49 52	6	11
15	typology and quantification of river flows is lacking	13 25 28 29 36 44	6	11
21	policy rather than guidance; template for decision-making rather than assessment of acceptability; too prescriptive	25 28 29 32 40 47	6	11
5	guidance and criteria too onerous; disproportionate for small schemes; (and large ones, 31)	7 29 31 48 49	5	9
19	assumption that hydropower degrades; some hydroschemes, esp small ones, have the potential to improve ecology	2 15 22 27 29	5	9
31	archimedes screw may be unfishfriendly	36 41 44 45 54	5	9
7	many other factors (industry, forestry drainage, intensive stock-grazing etc) affect ecology and are unregulated	2 7 15 49	4	7
12	socioeconomic benefits (may) outweigh small risk of deterioration	29 40 48 49	4	7
25	efficiency tests (Part A) too stringent: would significant restrict future development of all sizes of hydropower schemes	31 32 33 47	4	7
26	installed capacity / efficiency not useful yardsticks; 33 gives several more factors	31 32 33	3	5

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10	cost-benefit arguments on larger schemes are specious	6 49	2	4
13	prescriptive nature of checklist approach is unjustified	8 40	2	4
24	need guidance on whether natural barriers passable to fish	30 36	2	4
30	fish passes may not be properly designed for fish	36 45	2	4
33	small hydroschemes do not generate enough power to risk envirtal damage	44 46	2	4
34	guidance focuses too narrowly on protection of fish rather than othe envirtal consids; shd extend to watercourse peripheries(43) pearl mussel habitats (49 and others)	43 46	2	4
20	call for monitoring	23	1	2
22	nature provides protection against inefficient schemes: more expensive to build per energy unit	25	1	2
28	small schemes more deliverable and realistic	32	1	2
32	temperature change may be important to macroinvertebrate species	37	1	2
35	onus shd be on developer to demonstrate no negative effects: most of the fish people	54	1	2
	Q1: criteria adequate / not; could be relaxed, too prescriptive (32) not enough (35)	19 29 32 34 35 38 39 42 53	9	
	Q2: other circs shd be taken into a/c	29 31	2	
	Q3 checklist not helpful; could be improved (48)	19 20 38 40 44	5	
	Q4 do draft criteria meet objectives: unclear, not helpful, irrelevant, flawed concept, reservations (38) broadly	19 29 31 32 33 38 40 44 48	9	
	Q5 mitigation measures inadequate, more detail reqd, too stringent	19 20 33 36 38 44 49	7	
	Q6 mitigation practical (not: 29, 31, 32, 35, 40, 47, 49; reservations, 38)	29 31 32 35 36 38 39 40 42 49 53	11	
	Q7 other practical measures; current industry best practice fine, no need for additional measures (33)	24 29 31 32 33 40 44	7	