

Meeting at SEPA Dumfries offices 3rd May 2011

Present:

- Pauline Silverman, Shona McFarlane – SEPA
- Euan McConnell - Hydro installer
- Gavin King-Smith – Micro Hydro Association (mha) administrator

Points for discussion

- discuss potential local schemes with Euan McConnell
- other potential schemes in the region (GK-S desk-top and site surveys)
- issues raised in GK-S letter to SEPA of 20 April 2011
- other issues
- actions arising

Points arising

	Action
<p>1 SEPA have been concerned at a large number of applications for abstraction/impoundment licences recently received which do not meet the information requirements SEPA are looking for and where work has proceeded in a way likely to be detrimental to the environment. Some of these applications have been for small schemes. In some cases SEPA is pursuing enforcement action.</p> <p>GK-S requested that information, including photographs, concerning these be made available so that bad examples as well as good examples could be posted on the mha website (not identifying the sites where these are sub judice).</p> <p>PS stated that there was little confidence in SEPA that hydro installers were taking proper consideration of the SEPA guidelines due to the FITS encouraging new developers to the market who have little or no experience in hydro developments.</p> <p>GK-S suggested that SEPA might consider some form of training for designers and installers.</p> <p>PS suggested that it would be useful to have some form of certification or registration (other than MCS which does not address environmental issues) for designers/installers. GK-S suggested that a possible alternative to MCS currently under consideration by DECC which involves design certification followed by commissioning inspection might fulfil this need.</p> <p>GK-S will consider whether the mha, which currently has no resources, might be able to arrange some form of certification or registration for members listed as installers.</p> <p>We discussed the possibility of preparing a proforma document (spreadsheet?) for collecting information corresponding to the SEPA guidance checklists. EMC2 will do this for a number of schemes he is currently investigating together with confirmation of generators addressing acceptance</p>	<p>PS</p> <p>PS</p> <p>GK-S</p> <p>EMC²</p>

Comment [p1]: Not sure if this is possible as some pictures are sub judice. Also would need to ascertain from the owners if this was acceptable. SEPA would prefer to show examples of good practice.

Comment [p2]: SEPA would be happy to help with some for of training, but this would need to be sector led.

Meeting at SEPA Dumfries offices 3rd May 2011

	<p>by parties with affected boundaries. SEPA will look at using such a template to help officers speed up the determination process.</p> <p>Information can be provided by email with grid references, photographs and maximum abstraction rate together with notes demonstrating how the developer has gone through the guidance and justification for passing the initial screening so that SEPA can gain a preliminary response from a hydrologist.</p>	SEPA
2	<p>PS confirmed that SEPA abstraction requirements (hands-off flow in depleted reaches etc.) apply principally to salmonids and other protected species. The mitigation required and laid out in the new guidance is presumed enough to protect local trout and other ecology. There may be further site specific requirements where migratory species are found, and habitat is prime.</p>	
3	<p>SEPA will be conducting a research project into the impact of hydro schemes on the ecology of depleted reaches for both large and small schemes. NIEA, EA, will be involved in the project which will include a literature review. SSE have noted their interest to be involved.</p> <p>GK-S requested that information be provided about this project as so little research material is available (PS mentioned a study of impact for the Glen Lyon scheme).</p>	PS
4	<p>PS confirmed that for micro and pico hydro schemes SEPA's guidance seeks as a minimum only simple evidence of flows involving time-stamped and roughly scaled photographs of a watercourse in high and low flow states which could be compared with flows at nearby gauging stations. Most pico schemes will not require real hydrology data for SEPA purposes.</p>	
5	<p>PS explained that although the EU Water Directive requires status changes on significant watercourses (catchments > 10km²) to be reported, the Scottish Government has directed SEPA to consider degradation of status for all watercourses irrespective of size. PS will supply a reference to this direction which appears in the Water Quality Standards document.</p>	PS
6	<p>SEPA are considering implementing the requirement to advertise certain requests for abstraction which are deemed to fail flow standards by publishing the ads on the SEPA website.</p>	
7	<p>SEPA are introducing a "virtual permitting team" organisation as a quality improvement and efficiency measure. This would not end the practice of local officers with hydro scheme knowledge making early site visits. PS will advise when it is clearer how the process will be implemented.</p>	PS
8	<p>SEPA will be reviewing the implementation of all CAR licenses issued after 2006 to verify compliance. This will be done on a staged prioritised basis to meet WFD objectives.</p>	

Comment [p3]: The idea I think would be to produce a template for applications for micro/pico schemes to help officers speed up the determination process.

Comment [p4]: There should also be notes demonstrating how the developer has gone through the guidance and justification for passing the initial screening.

Comment [p5]: This will in general be the minimum required – developers should follow the guidance for supporting information – this lays out the requirements – most pico schemes will not require real hydrology data for SEPA purposes – may be for the developers business needs.

Comment [p6]: Not sure how this will be implemented, but will keep you posted.

Comment [p7]: We will do this on a staged prioritised basis to meet WFD objectives.

Meeting at SEPA Dumfries offices 3rd May 2011

9	local SEPA teams will usually be happy to confirm in writing to potential generators that pre-applications for schemes with sufficient accompanying data according to the SEPA guidelines should result in licences being granted with standard mitigation measures, subject to checks on other rights to water abstraction from the <u>watercourse</u> .	
10	SEPA expect specific drawings of structures to be submitted 2 months prior to construction commencing.	
11	There is ongoing co-operation between SEPA (Peter Pollard) and the EA (John Aldrick and Catherine Tanner)	
12	PS and SMCf explained that in cases where special mitigation measures are required, the permitting process can be slowed because of the requirement for management <u>approval</u> . The process is being systematised to speed it up.	
13	PS explained how the limit lower limit of 6% slope in a depleted reach of >1500m is assessed. Sections with >6% slope are discounted from the calculation of the length of the depleted reach.	
14	PS explained how the limit lower limit of 6% slope in a depleted reach of >1500m is assessed. Sections with >6% slope are discounted from the calculation of the length of the depleted reach.	
15	Benefit assessments (using SG67) are not made for schemes generating <0.35GWh/annum, as long as they meet the criteria in the run of river guidance.	
16	RM34 tests are not made for abstraction applications with an output of less than 0.35GWh/annum passing the standard guidance checklists because the schemes are deemed to have a minimal (unmeasurable) net impact on the environment.	

Comment [p8]: I don't see this being a problem but would be a local decision to do this. If we get to a stage where we have good information and no other third parties, I dont see why this would be an issue.

Comment [p9]: We are working on a bank of conditions to speed this process up.