

Standard Rules Consultation No 30

Proposals for New Standard Rules Permits for Groundwater Activities

Consultation response form

Date: April 2025

# Introduction

The Environment Agency (EA) is responsible for regulating “groundwater activities” as set out in [Schedule 22](https://www.legislation.gov.uk/uksi/2016/1154/schedule/22) of the Environmental Permitting Regulations 2016 (the EPR).  These can be defined as activities that take place on or below the ground surface with the potential to impact upon the quality of groundwater.

Groundwater activities require an environmental permit issued by the Environment Agency unless an exemption from permitting applies. In October 2023 the EPR was amended meaning that, as an alternative to only issuing “bespoke permits”, the Environment Agency can also choose to regulate groundwater activities using a “standard rules permit” approach.

The Environment Agency has now developed four proposed standard rules permits for some groundwater activities. The purpose of this consultation is to introduce these permits, which are intended to cover certain cemetery developments, and some closed-loop ground source heating and cooling systems.

## What we are consulting on

This consultation is to seek your views on the proposed new standard rules for:

* new cemetery developments proposing moderate burial rates
* new cemetery developments proposing burials into unweathered bedrock
* new natural burials grounds
* new closed-loop ground source heating and cooling systems in certain settings

We will also seek your views on the generic risk assessments associated with each standard rules set.

This is your opportunity to make sure that the rules work for you and your industry, but also provide the necessary protection to the environment.

This consultation seeks views on standard rules permits for different sectors but there is no requirement to respond to all questions.

## How to respond to this consultation

The consultation will run for a period of 12 weeks from 1 April 2025 and will close at 23:59pm on 24 June 2025. We will publish our response, together with the new standard rules and risk assessment, on GOV.UK.

The consultation document, the proposed permits, and the generic risk assessments can be found on the consultation page on the Citizen Space website at:

<https://consult.environment-agency.gov.uk/environment-and-business/standard-rules-consultation-no-30-gw-activities>

You can also respond to the consultation online at this website. If you would prefer to respond by email or post, please use this form by answering the questions in the sections later in the form.

**Ask for a copy of the consultation document**

Please contact us if you need a copy of the consultation document sent to you. You can do this by contacting our National Customer Contact Centre:

* email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk?subject=Charges%20consultation:%20waste%20crime)
* telephone: 03708 506 506 (Monday to Friday, 8am to 6pm)
* minicom for the hard of hearing: 03702 422 549
* post:

Environment Agency

National Customer Contact Centre

PO Box 544

Rotherham

S60 1BY

**Returning your response**

To return your completed response, please email this form to [national.groundwater@environment-agency.gov.uk](mailto:national.groundwater@environment-agency.gov.uk) using the heading ‘SR30 Consultation Response Form’.

To return your completed response by post please send it to:

E&B Groundwater Team

Environment Agency

Trentside Offices,

Scarrington Road,

West Bridgford,

Nottingham,

NG2 5FA

**Consultation principles**

We are running this consultation in line with the guidance set out in the government’s [Consultation Principles](http://www.gov.uk/government/publications/consultation-principles-guidance).

If you have any queries on this consultation please contact: [national.groundwater@environment-agency.gov.uk](mailto:national.groundwater@environment-agency.gov.uk)

If you have any queries or complaints about the way in which this consultation has been carried out, please email [consultations.enquiries@environment-agency.gov.uk](mailto:consultations.enquiries@environment-agency.gov.uk).

## How we will use your information

After the consultation has closed, the Environment Agency will summarise responses in a consultation response document and make this publicly available on GOV.UK. We may include comments or quotes, unless you specifically request that we keep your response confidential.

We will not publish names of individuals or personal data, but we will publish the name of the organisation for those responses made on behalf of organisations. We will not respond individually to responses. If you have asked to be notified, we will contact you to let you know when the consultation response document is published.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

### Privacy notice

The Environment Agency would like to keep you informed about the outcomes of the consultation. If you would like to receive an email acknowledging your response and telling you when we’ve published the consultation response document, please provide your email address with your response.

By giving us your email address, you consent for us to email you about the consultation. We will keep your details until we have notified you of the response document publication.

We will not share your details with any other third party without your clear and full consent unless required to do so by law.

You can withdraw your consent to receive these emails at any time by contacting us at [national.groundwater@environment-agency.gov.uk](mailto:national.groundwater@environment-agency.gov.uk).

The Environment Agency is the data controller for the personal data you provide. For more information on how we deal with your personal data please see our [personal information charter](https://www.gov.uk/government/organisations/environment-agency/about/personal-information-charter) on GOV.UK.

You can email our Data Protection team: [dataprotection@environment-agency.gov.uk](mailto:dataprotection@environment-agency.gov.uk).

# Your details

We welcome your views on the proposed new standard rules permit for new cemetery developments and some closed-loop ground source heating and cooling systems.

To help us analyse and assess the consultation responses, we would like you to answer a few questions about:

* you
* your organisation or business

Are you providing an individual or personal response, or a response on behalf of an organisation?

Please select from the following options:

☐ Responding as an individual

☐ Responding on behalf of an organisation or group

☐ other

If you are responding on behalf of an organisation, group or trade association, or selected other, please specify:

If you are responding on behalf of an organisation, how many people work there?

Please choose one of the following:

sole trader

fewer than 10

11 to 49

50 to 249

250 to 999

more than 1,000

What is your main area of business?

Please choose one of the following:

Bereavement sector

Heating sector

other

If you selected 'other' please specify.

How did you find out about this consultation?

from the Environment Agency

from another organisation

through an organisation, group, or trade association you are a member of

press article

social media, for example, Facebook, X

through a meeting you attended

other

If you selected ‘other’, please tell us how you found out about this consultation.

In some cases, we may wish to follow up a consultation response where there is an offer of help or provision of evidence. We can also let you know when we have published the Consultation Response Document.

If you're happy for us to do so, please provide your email address below.

Can we publish your response? **We will not publish any personal information or parts of your response that will reveal your identity.**

This is a required question. Please select one of the following:

yes

no

If you answered ‘No’, please tell us why as we will need to understand this when responding to any Freedom of Information requests.

# Standard rules for moderate burial rates

This standard rules permit allows new cemetery developments to operate with moderate burial rates subject to geographical constraints and monitoring conditions. Further details can be found in section 3.1.2 of the consultation document.

Question 1: **Do you agree with our proposal to use standard rules permits for new cemeteries with moderate burial rates?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 2: **Do you agree with the rules and constraints in the proposed standard rules for cemeteries with moderate burial rates?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 3: **Would any of the requirements prevent prospective operators from using the proposed standard rules?**

Please choose one of the following:

yes

no

don’t know

no opinion

Please provide details to explain your answer.

Question 4: **Do you agree that the risks associated with the activity are identified by the generic risk assessment?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 5: **Do you agree that the measures under these standard rules to manage, mitigate or reduce the environmental risks are appropriate?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

# Standard rules for burials into unweathered bedrock

This standard rules permit allows new cemetery developments to operate where there will be burials directly into bedrock. Further details can be found in Section 3.1.3 of the consultation document.

Question 6: **Do you agree with our proposal to use standard rules permits for new cemeteries with burials into bedrock?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 7: **Do you agree with the rules and constraints in the proposed  
standard rules for cemeteries with burials into bedrock?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 8: **Would any of the requirements prevent prospective operators from using the proposed standard rules?**

Please choose one of the following:

yes

no

don’t know

no opinion

Please provide details to explain your answer.

Question 9: **Do you agree that the risks associated with the activity are identified by the generic risk assessment?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 10: **Do you agree that the measures under these standard rules to manage, mitigate or reduce the environmental risks are appropriate?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

# Standard rules for natural burial grounds

This standard rules permit covers natural burial grounds which have low burial densities or may be designated as a Local Nature Reserve. Further details can be found in Section 3.1.4 of the consultation document.

Question 11: **Do you agree with our proposal to use standard rules permits for new natural burial grounds?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 12: **Do you agree with the rules and constraints in the proposed standard rules for natural burial grounds?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 13: **Would any of the requirements prevent prospective operators from using the proposed standard rules?**

Please choose one of the following:

yes

no

don’t know

no opinion

Please provide details to explain your answer.

Question 14: **Do you agree that the risks associated with the activity are identified by the generic risk assessment?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 15: **Do you agree that the measures under these standard rules to manage, mitigate or reduce the environmental risks are appropriate?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 16: **Do you agree with the proposal to restrict the use of embalming fluid in these standard rules?**

“Embalming fluid” is liquid used to delay the decomposition of human remains.

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 17: **To what extent do you agree that natural burial grounds will benefit from this proposed standard rules permit?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

# Standard rules for CL-GSHC systems

This standard rules permit allows operators to use CL-GSHC systems in environmentally sensitive locations subject to geographical constraints and monitoring conditions. Further details can be found in Section 3.2.2 of the consultation document.

Question 18: Do you agree with our proposal to use standard rules permits for CL-GSHC systems?

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 19: **Do you agree with the rules and constraints in the proposed standard rules permits for CL-GSHC systems?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 20: **Would any of the requirements prevent prospective operators from using the proposed standard rules?**

Please choose one of the following:

yes

no

don’t know

no opinion

Please provide details to explain your answer.

Question 21: **Do you agree that the risks associated with the activity are identified by the generic risk assessment?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 22: **Do you agree that the measures under these standard rules to manage, mitigate or reduce the environmental risks are appropriate?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

Question 23: **Do you agree with the proposal to limit the net heat energy input into the environment (0.5 kWh per m³ per year) in these standard rules (as described in section 3.2.2 of the consultation document)?**

An annual “net heat energy input” limit is proposed.  The limit is proportionate to the size of installation, meaning that larger heat inputs are allowed when spread over a larger volume of aquifer. This condition (0.5 kilowatt hours per cubic metre of aquifer per year) will reduce the risk of impact from heat plumes within groundwater.

The figure has been considered on the basis of a system with typical installation details with a maximum power output of 100kW operating for three months of the year.  This has drawn upon research and analysis work published in 2024 on [Environmental impacts of temperature changes from ground source heating and cooling systems](https://www.gov.uk/government/publications/environmental-impacts-of-temperature-changes-from-ground-source-heating-and-cooling-systems), as well as advice from industry stakeholders.

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

# Questions on business impacts

You only need to complete this section if your business activities could be covered by these proposed standard rules.

The Growth Duty requires us to have regard to the desirability of promoting economic growth, alongside our other statutory duties. As part of this duty, we are carrying out an assessment of the economic impacts of the proposed standard rules.

Question 24: **Are there any potential economic impacts, either positive or negative, that the introduction of the standard rules could have on your business?**

Please choose one of the following:

strongly agree

agree

neither agree nor disagree

disagree

strongly disagree

not applicable

Please provide details to explain your answer.

# Further comments

Question 25: **Please provide any further comments or observations that you would like us to consider as part of this consultation.**

End of the consultation

**Publishing our consultation response**

We will publish our response on GOV.UK within 12 weeks of this consultation closing and before we implement the standard rules permits. It will include a summary of the comments and queries we receive. We will add a link to this document on the consultation page on Citizen Space.

# **Would you like to find out more about us or your environment?**

Then call us on

03708 506 506 (Monday to Friday, 8am to 6pm)

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Or visit our website

[www.gov.uk/environment-agency](https://www.gov.uk/environment-agency)

incident hotline

0800 807060 **(24 hours)**

floodline

0345 988 1188 **(24 hours)**

Find out about call charges (<https://www.gov.uk/call-charges>)

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