



# Consultation on revisions to our public participation statement

A summary of consultation responses

March 2019

We are the Environment Agency. We protect and improve the environment.

We help people and wildlife adapt to climate change and reduce its impacts, including flooding, drought, sea level rise and coastal erosion.

We improve the quality of our water, land and air by tackling pollution. We work with businesses to help them comply with environmental regulations. A healthy and diverse environment enhances people's lives and contributes to economic growth.

We can't do this alone. We work as part of the Defra group (Department for Environment, Food & Rural Affairs), with the rest of government, local councils, businesses, civil society groups and local communities to create a better place for people and wildlife.

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# Foreword

The consultation set out proposed revisions to our public participation statement ('PPS').

The public participation statement explains when and how we consult:

- on applications for environmental permits
- when preparing and changing rules for standard permits

For the revised PPS, besides an overall update, we proposed to:

- refine the contents so it is easier and quicker to find what you need to know
- include a list factors we consider when deciding if an application is 'high public interest'
- include when and how we consult on permit applications for flood risk activities, medium combustion plant, and specified generators

The consultation was an opportunity to comment on the proposed revisions and for these to be considered before publication of the revised statement on GOV.UK.

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# 1. How we ran the consultation

We ran the consultation for 8 weeks from the 7 January 2019 to the 1 March 2019. The consultation was run using our online Citizen Space consultation tool.

We want to ensure that our Public Participation Statement (PPS) is useful, clear and user-friendly. We asked 12 questions about this in our consultation.

We also welcomed comments on the inclusion of factors we consider when deciding if an application is of 'high public interest'.

We had 8 direct responses to the consultation, which included 2 from site operators, 2 from trade associations and 4 from members of the public.

We also received a number of comments made through our consultation on charging proposals from April 2019. These related to the high public interest factors mentioned above. The comments and our response are set out in the section on Question 5 below.

# 2. Summary of key findings and actions we will take

We thank all respondents for their time and contribution to this consultation.

We have reviewed the responses and will make amendments to the PPS as identified in section 3 below. We have also explained where we have not been able to take comments on board. We aim to publish the revised PPS in March 2019.

Some of these comments are related to, but not directly for inclusion in the PPS. We will consider the respondent's points further and how best to address them.

### 3. Summary of responses to each consultation question and our response to these

#### Question 1: Do you agree with the new title of the PPS?

We received 8 consultation responses to this question:

**Yes:** 7 out of 8 (3 'strongly agreed' and 4 'agreed')

**Disagreed:** None

**Neither agreed or disagreed:** 1 out of 8

#### **Summary of key points raised:**

- the proposed title is more “to-the-point”.
- the proposed title is more appropriate and direct.

#### **Our response:**

We are pleased that the majority of respondents agreed with the proposed new title, ('Environmental Permitting: when and how we consult'). We will keep this title when the revised PPS is published.

#### Question 2. Do you consider that any information you need has been removed?

We received 8 consultation responses to this question:

**Yes:** 3 out of 8

**No:** 5 out of 8

#### **Summary of key points raised:**

Some respondents felt the following useful information had been removed:

- an explanation of the differences between standard rules and bespoke permits (2 responses)
- detail of who is consulted
- list of organisations that have Working Together Agreements with the EA
- "flow diagrams" of the process

#### **Our response:**

We agree that an explanation of standard rules and bespoke permits is information that may be needed by those who are unfamiliar with the terms. We will include some explanatory text in the final version of the PPS.

The other information mentioned may be useful, but is not necessarily information that is needed. In terms of the organisations that we consult, the complete list is extensive and considered too long to reproduce in the PPS. However, we will expand the list of examples in the PPS to give a better understanding of the breadth of consultation.

As mentioned by one respondent, we have Working Together Agreements with some of the organisations we consult. Some of these agreements are over 10 years old and have become out of date. Some are no longer applicable, for example where the organisation subject to the agreement has changed.

One respondent specifically mentioned the Working Together Agreement of the Shale Environmental Regulator Group. Whilst this agreement sets out how the members of the group will work together, it doesn't relate directly to permitting consultations.

In addition, some of these agreements are hosted on other websites. We're not proposing to include links to these in the PPS.

On the matter of flow diagrams, we have aimed to revise the text in the PPS to be sufficiently clear and easy to use without the need for diagrams. Whilst we are not proposing to include flow diagrams for this edition of the PPS, we will keep this under review.

### Question 3. Is it quick and easy to find what you need to know?

We received 8 consultation responses to this question:

**Yes:** 5 out of 8

**No:** None

**Don't know:** 3 out of 8

#### Summary of key points raised:

- it is easy to find and comment on relevant documents
- essential content is presented in a more streamlined format, which is generally an aid to ease of reference - except where useful detail has been omitted
- the headings are helpful to attain information required, but there are some concerns as highlighted in responses to other consultation questions

#### Our response:

We are pleased that most respondents found it quick and easy to find what they needed. We hope we have addressed the specific concerns at the appropriate point in this document.

### Question 4. Is it clear from the PPS which permit applications we will always consult on?

We received 8 consultation responses to this question:

**Yes:** 4 out of 8

**No:** 3 out of 8

**Don't know:** 1 out of 8

#### Summary of key points raised:

- The existing guidance is extremely confusing with respect to installation standard rules. It seems that the rule set is consulted on and then the standard rules installation application is consulted on again. The proposed guidance makes it very clear how and when consultation is done for standard rules applications irrespective of whether they are installations or not.

- It is clear which permit applications will always be consulted upon, but the information is slightly fragmented.
- It does not appear clear which applications the Agency must, or simply may, consult on.
- For medium combustion plant the guidance would benefit from providing clarity on the definition of 'significant negative effects' or at least clarify the decision making process in order to reach this type of opinion.
- For flood risk activities, the document states that consultation will take place for applications that are "likely to have a significant adverse effect on the environment". Should the Environment Agency be issuing a permit if an activity is likely to have such an effect?
- It is important for the water industry to have clarity regarding the permit applications that they will be consulted on. In the past there have been cases where water companies should have been statutory consultees but were not consulted. The respondent listed those applications they consider a water company should be consulted on.

### **Our response:**

It used to be a requirement that we consult on installation standard rules permit applications as well as the rule sets themselves. This requirement was removed by an amendment to the EP Regulations. We are pleased that this has now been made clear. We are still required to publicise these applications, but this is for awareness rather than consultation.

One respondent felt that the information in this section of the PPS was slightly fragmented. We will review the layout of the information and make it more cohesive wherever possible.

One respondent commented that it didn't appear clear which applications we must, or simply may, consult on. The respondent is correct that some consultations are a direct requirement of the EP Regulations and others we have chosen to consult on. However, irrespective of this, we will always consult on all those applications identified in the PPS. We do not consider there to be benefit in adding text to distinguish between the two.

We have reviewed the list of those applications that we have chosen to consult on. We have decided that it would be appropriate to consult on all 'substantial variations', as set out in section 3.6 of the EP Charging Scheme. So, in addition to 'substantial variations' for installations and mining waste, this will now include those for water discharges, groundwater activities and waste operations. It also includes variations that will convert another kind of regulated facility into an installation. We will update the PPS accordingly.

One respondent said that the PPS would benefit from a definition, or the decision making process, for defining 'significant negative effects' for medium combustion plant. The term 'significant negative effect' is used, but not defined further, in the EP Regulations. We will consider how to best address this aspect, including the other 'substantial variations' mentioned above. Any further guidance or definitions are likely to be separate to the PPS itself.

One respondent questioned whether we should issue a permit for a flood risk activity that is 'likely to have a significant adverse effect on the environment'. However, at that stage we would only be consulting on the application. This would then help inform the decision on whether to grant or refuse the application.



One respondent raised an issue of when water companies should be consulted on permit applications. Whilst we have internal instructions setting this out, the respondent has suggested additional scenarios that would require consultation. Whilst it is not considered necessary to have this level of detail in the PPS, we will consider the respondent's points further and how best to address them.

## Question 5. Does the list of factors give you a better understanding of when we may decide an application is high public interest (HPI)?

We received 8 consultation responses to this question:

**Yes:** 4 out of 8

**No:** 1 out of 8

**Don't know:** 2 out of 8

**Not answered:** 1 out of 8

In addition to the above, we received related comments made in response to our consultation on charging proposals for 2019.

### Summary of key point raised:

- gives greater transparency for public
- the list does provide a better understanding
- the list of relevant factors is useful to an extent
- the criteria should be applied fairly and proportionally across the wide range of permitted activities that we have
- the ultimate decision on HPI status still feels very subjective (3 responses)
- the criteria are very generic, and could cause applications which are not of 'High Public Interest' to be classified as such. For example, if a Member of Parliament were to express any interest in an application, it would automatically be classified as a 'High Public Interest' application. This would be the case even if the MP were to simply make simple supportive comments.
- one key missing criterion is an assessment of whether the increased public interest is based on appropriate evidence and is therefore reasonable (2 responses)
- the uncertainty surrounding HPI status decisions increases the difficulty of planning permitting and operational activities
- the list would be improved by providing more transparency and detail regarding the decision making process
- there should be clear and transparent reasoning behind making a site an HPI (with this reasoning provided to the operator) and a mechanism for an operator to "appeal" against being an HPI site.
- it would be helpful to state definitively whether or not standard as well as bespoke permit applications may be considered as being of 'high public interest'
- significant concerns that groups or individuals opposing an application could intentionally generate significant EA activity, with the sole purpose of imposing significant inappropriate costs on the operator at the permit application stage, due to time and materials charges (4 responses)

One respondent gave the following example: a group opposing the construction of a waste facility may coordinate a campaign to inundate the EA with letters outlining their objections and requesting an EA response. It would not be appropriate for operators to have to pay time and materials charges to cover the cost of EA staff responding to each and every letter. We would like further clarity regarding how the EA would determine and deal with vexatious and mischievous activities as described above.

- It would be helpful if the EA could develop a package of information that could provide information regarding generic concerns that are likely to be raised on each occasion. We would be keen to assist the EA to develop such an approach, which would hopefully provide reassurance to local residents, as well as saving the EA time.
- We believe the current list (of factors) is very broad in scope and also heavily interconnected. The list also provides no guidance to the regional EA decision makers as to the extent previous operational history within the area or with the operator should be taken into account. We recommend further additional points to the list:
  - The application is fundamentally different to other applications submitted within the area.
  - The techniques, substances or operations are novel
  - The applicant is going about its activities for the first time.

It is our view that 'drill and core' / (or science), wells should not be 'high public interest', as they are not new, nor novel and have been drilled many hundreds of times before.

Given there are now in excess of 300 operating wells in the UK with minimal environmental impact, we also believe that UK conventional assets should not be designated high public interest.

### **Our response:**

The factors we consider when deciding whether an application may be high public interest is already established within the Environment Agency. The reason for including them in the PPS is to make our decision making more transparent. Part of the aim was to give applicants a better advance understanding of whether their application may be high public interest. This was to assist them with planning accordingly.

Whether an application is of high public interest will depend on a case by case basis. Consequently, the list of factors stated is intended as a broad overview, rather than a detailed description or checklist. The list of factors is also not exhaustive as we will consider all relevant information. To that extent we agree that previous the operational history can provide useful context and background information.

In terms of involvement from a Member of Parliament, we would consider whether there is ongoing engagement and the nature of that engagement. For example, whether it was a simple enquiry, or whether the MP was making representations on behalf of their constituents. The expression of any interest would not therefore make an application automatically high public interest.

Two respondents considered that the increased public interest should be based on evidence and therefore reasonable. Whilst we do consider that any concerns should be reasonable, we would not necessarily consider they need to be evidentially based. For example, a large number of members of the public may have genuine concerns over amenity issues, such as noise, dust or odour. It may be that there is no supporting evidence, but it would still be appropriate to consult and engage with the community on those issues.

In terms of the decision making process, the status of an application is discussed between area regulatory officers and permitting officers. It is then reviewed through the management chain, with the ultimate decision resting with area environment manager. It is not considered that this information is needed in the public participation statement.

When an application is considered to be high public interest, we will write to the applicant. There is the opportunity to discuss the decision at that point. There is no statutory right of appeal in the EP Regulations. However, such a decision is subject to our [complaints procedure](#).

With regards to standard rules permit applications, we will add some text to clarify what we will do if it attracts high public interest. We will also clarify our position in terms of permit transfer applications.

In terms of responding to a letter campaign, we are unlikely to send an acknowledgement to each individual where we receive a large mailing of standard responses. Instead we will publish a response on our website.

We also have a package of standard information leaflets covering generic issues. We are currently reviewing these leaflets to ensure they remain up to date.

The above points may help reduce the costs we recover for additional work on high public interest applications. We will work with our charging team to consider further how best to address targeted campaigns with the sole intention of imposing additional costs.

One respondent has suggested additional HPI criteria including whether an application is fundamentally different to others in the area, novel, or the applicant is new to the activities. The respondent went on to explain their view that 'drill and core' / (or science), wells should not be 'high public interest', as they are not new, nor novel and have been drilled many hundreds of times before.

We believe that a decision on an application being considered as high public interest should be based on the relevance, scale and duration of interest. The proposed criteria are not considered to be reflective of this. For example, there are established technologies that may attract high public interest and it is not considered appropriate to discount these on the basis that it is not new or novel.

Similarly, decisions on whether an application is high public interest needs to be taken on a case by case basis. It is therefore not considered appropriate to disapply it for any particular industry sector.

One respondent made some additional comments relating to high public interest in response to question 12.

## Question 6. Are the consultation timings for a permit application clear in the PPS?

We received 8 consultation responses to this question. 1 respondent didn't directly select a 'yes' or 'no' option. From the comments they provided, we have included a 'no' response below.

**Yes:** 4 out of 8

**No:** 4 out of 8

### Summary of key points raised:

- consultation timings are clearly stated in usual cases (2 responses)
- for emergency applications - no minimum period of consultation is indicated

- for applications of 'high public interest' no indication is given as to what the extended consultation period may be (5 responses)
- it is not clear whether the usual 20 working days consultation period is for when there is no high public interest
- a reduction in the timescales between the 'duly made' date and when the application is publicised would provide an improved level of service for the applicant (2 responses)

**Our response:**

In respect of permit applications made in time of an emergency, we will consult for as long as the circumstances will allow. These situations will be rare, for example in the unfortunate event of an animal disease outbreak, such as 'foot and mouth' disease. Due to the individual nature of these events, it has not been possible to set a minimum consultation timescale.

For applications of high public interest, we have considered whether it is possible to set a maximum consultation period. We must allow sufficient time to fully engage with the public and other consultees. This may involve allowing time for events such as 'drop in sessions' to take place. The degree of engagement and the time it takes will vary according to the circumstances of each application. It is therefore not considered appropriate to set a generic maximum timescale.

We do understand applicants' concerns that this may increase the overall time to determine their application. We will keep the consultation period as short as possible, whilst allowing sufficient time for full engagement. This should ensure that consultation periods do not become unnecessarily protracted.

In respect of the 20 day consultation period, we will make it clearer in the PPS that this applies to applications that are not of high public interest. Applications of high public interest may have consultation periods longer than 20 days, as discussed above.

Two respondents commented that reducing the timescales between the 'duly made' date and when the application is publicised would be of benefit. The stated 30 day period is a maximum, starting on the day we receive a 'duly made' application, (rather than the date we decide it can be duly made). We aim to consult as soon as possible after the application has been 'duly made'. We will review the proposed wording of the PPS to see if this can be made clearer.

In addition to the above we received one item of feedback that the target 16 week determination timescale is not being met. We welcome this feedback and have passed the information to the relevant team.

**Question 7. Is it clear from the PPS where you can find a permit application consultation to comment on?**

We received 8 consultation responses to this question:

**Yes:** 5 out of 8

**No:** 2 out of 8

**Don't know:** 1 out of 8

**Summary of key points raised:**

- a URL (for noting down) as well as a web link might be useful for those interested in commenting but without immediate Internet access to the Government website.

- adding a search function for 'applications in my area' in addition to the alphabetical name search. This will avoid the need to open each application in order to find the location and would provide a better user experience of the system.

**Our response:**

The finalised version of the PPS will be published as a web page on GOV.UK. Those reading it will therefore already have accessed the website.

The list of permit applications is organised alphabetically according to postcode. This should enable customers to find applications close to their location.

## Question 8. Is it clear from the PPS when we will consult on standard rules?

We received 8 consultation responses to this question.

**Yes:** 6 out of 8

**No:** None

**Don't know:** 2 out of 8

**Summary of key points raised:**

- the distinction between consulting on standard rule sets and not consulting on individual standard rule applications had been made clearer, (2 responses)
- it might be helpful if some detail of the standard rules were to be given within the PPS itself rather than simply a web link to them.
- 'existing permit holders' are not explicitly mentioned in the list of interested parties for standard rules consultations (albeit they are mentioned elsewhere).

**Our response:**

We are pleased that the majority of respondents found this part of the PPS clear. With respect to the second point, we will include a brief overview in the PPS as to what a standard rules permit is.

In relation to the last point, existing permit holders are consulted on proposed changes to existing standard rules permit. This is mentioned in the 'Changes to existing standard rules' section, but we will also add this to the earlier 'How we consult on standard rules' section for clarity.

## Question 9. Are the consultation timings for standard rules clear in the PPS?

We received 8 consultation responses to this question.

**Yes:** 6 out of 8

**No:** 1 out of 8

**Don't know:** 1 out of 8

**Summary of key points raised:**

- it would be helpful if it was stated whether the 12-week and 20-day 'normal' consultation periods are minimum periods in every case.
- the 12 week transition period (for changes to rule sets) does not allow adequate time for a bespoke permit to be applied for and determined. We would appreciate additional guidance on what position the Environment Agency would take in such circumstances.

## Our response

In respect of the first point, the consultation period for new standard rules is normally for 12 weeks. The consultation period for changes to standard rules is normally for a minimum of 28 days. We will review the wording in the PPS to see if this can be made clearer.

In relation to the 12 week period for a revised standard rule sets to take place, this is the existing period set in the EP Regulations. Any enforcement would be in accordance with our [enforcement and sanctions policy](#).

## Question 10. Is it clear from the PPS where you can find a standard rules consultation to comment on?

We received 8 consultation responses to this question.

**Yes:** 6 out of 8

**No:** None

**Don't know:** 2 out of 8

### Summary of key points raised:

- it would be helpful to have a full list of the standard rules in this document. However, I also appreciate that the desire was to make this current document shorter and snappier and it is at least easy to click through to this page directly from the current document.
- a URL (that can be noted down) as well as a web link might be useful for those interested in commenting but without immediate Internet access to the Government website.

### Our response:

The current list of standard rules is maintained on a different GOV.UK webpage. This list is long and subject to change as new ones are added and others changed or removed. We consider that reproducing the list would lengthen the PPS without a corresponding benefit. As the respondent has noted, it is easy to follow the link in the PPS for anyone wanting to view the full list. We are therefore not proposing to include the full list of standard rules in the PPS.

On the second point raised, the finalised version of the PPS will be published as a web page on GOV.UK. Those reading it will therefore already have accessed the website.

## Question 11. How easy did you find the PPS to use?

We received 8 consultation responses to this question.

**Very easy to use:** 1 out of 8

**Easy to use:** 4 out of 8

**Neither easy nor difficult to use:** 3 out of 8

**Difficult to use:** None

**Very difficult to use:** None

**Don't know:** None

### Summary of key points raised:

- The PPS is clearly laid out and easy to follow
- It would be useful to provide a summary flow diagram of the process to facilitate better understanding

- The revised PPS is easy to use, but more information is required about how future changes will be communicated to interested parties. Unlike the current version (and documented guidance more generally), there is a risk of future version changes and minor amendments going forward. An option to register for future updates (or an equivalent mechanism) would be valuable for this (and other guidance) as it is converted to web-based pages
- The document is quite easy to use. However, the previous document was slightly more friendly to the eye, with the larger headings and the numbered sections and clauses
- Notwithstanding the streamlined format, greater explanatory detail would (as noted above) be helpful in assisting ordinary members of the public to participate in the consultation process

**Our response:**

On the matter of flow diagrams, we have aimed to revise the text in the PPS to be sufficiently clear and easy to use without the need for diagrams. Whilst we are not proposing to include flow diagrams for this edition of the PPS, we will keep this under review.

With regards to future changes, we will consult on any proposed revision to the PPS. On the wider point of registering for future updates, there is the option of registering for email alerts when pages are updated or added to the 'Environmental management: Environmental permits' pages on GOV.UK. This can be subscribed to by following the link 'Subscribe to email alerts link' on the Environmental Permits home page, or by this direct link: <https://www.gov.uk/topic/environmental-management/environmental-permits/email-signup>

On the matter of the existing being more friendly to the eye, we published the draft PPS as a web page, as this is the proposed final format. We also published a .pdf version of the web page and it is thought that the respondent may be referring to this version.

The headings and sections should be more apparent in the final web page version. We are not proposing to add numbering at this stage, but we will keep this under review.

On the last point of greater explanatory detail, we hope these points have been addressed at the appropriate point in this document.

**Question 12. Please tell us if you have any further comments that have not been covered by the previous questions.**

2 respondents provided further comments as summarised below:

**Respondent 1:**

- It would be valuable for the water industry to have sight of the draft permit prior to issue for those applications progressed after the consultation process.
- We would also welcome consistency of approach regarding permit content for example whether numeric limits relating to discharge to sewer are applied or not.

**Our response**

On the first point, we don't routinely ask consultees to review draft permits. However if a consultee asks to see our draft decision we may show it them.

We do publish draft decisions for installations of high public interest on our website and this explains where people can view the documents.



On the second point, the permit content is outside the scope of the public participation statement. We welcome the feedback and will pass it on to the relevant team for consideration.

### **Respondent 2:**

- We strongly support the inclusion of consideration of the relevance of the public interest, that is, whether or not the level of interest relates to the regulated activities in scope of the consultation.
- We are concerned at the possibility of a 'presumption of HPI' status becoming established. For example, one of the listed factors is 'media interest'. We consider that there is a risk of previous HPI decisions and corresponding media interest driving future public interest rather than simply reflecting it. We consider there is a risk of particular sites or activities becoming HPI by default, even where an application is for a minor (or even administrative) change. We consider that repeated consultation on minor issues risks diminishing the level of engagement and quality of response when more significant changes or new permits are applied for, in essence, there is a risk of 'consultation fatigue' in particular local areas.
- We consider that an additional HPI decision making factor should be the level of previous consultation which has been undertaken as well as the relevance of those consultation responses.
- We are concerned at the prospect of an application being potentially reclassified as high public interest at any point up to the date of determination. We consider, that subject to the absence of some materially significant factor emerging late in the process, that a cut-off for HPI decisions should applied to the determination process (set perhaps at nine weeks after the application duly made date).
- While we ourselves understand the meaning of the terms used, we consider it possible that members of the public or others may not fully understand some of the terms used. We note that some terms have been linked to other guidance (for example, installation and mining waste permits) however others have not (such as, 'bespoke' and 'substantial changes'). We consider that some audiences may find additional guidance on these terms useful when used in their particular environmental permitting context.

### **Our response**

The consultation we carry out will depend on the particular circumstances, so that we can consult and engage most appropriately and effectively. For particular high public interest sites, it may be that it is appropriate to simply consult for longer than 20 working days, rather than arrange public drop-in events. It is hoped that this should avoid the mentioned consultation fatigue.

With regard to media interest, this is just one of the considerations in deciding if an application is high public interest. In making this decision we agree that it is appropriate to understand the reasons for the media interest.

With respect to the level of previous consultation, we believe that each application should be assessed on the relevance, scale and duration of interest for that particular application. However, we agree that consideration of previous consultations can provide useful context and background information. It is also useful information in providing consideration of past consultation responses could be useful in deciding what consultation / engagement to carry out for future HPI applications.



In terms of application determination timescales, we are not proposing to lengthen existing timescales. We aim to determine applications as quickly as possible and to keep applicants updated on progress.

On the matter of when an application is considered to be high public interest, the majority are identifiable early on in the application process. This would be our preference as it allows us to plan our community engagement before we start consultation. We would also review situation at the end of the application consultation period. We agree that a review of the HPI status would normally be prompted by other events. However, we cannot discount the fact that there may be occasions when the high public interest arises later on in the process. Whilst we appreciate the implications for the applicant, we feel it would be unreasonable not to engage the local community in these situations. We will of course be mindful of the timescales when deciding how and when to engage the community.

On the last point, we have included a description of standard rules and bespoke permits. We are considering how best to define other terms such as 'substantial variations' and 'significant negative effect'.

## 4. Next Steps

We thank all respondents for their time and contribution to this consultation.

Responses from this consultation will be used to inform the finalised revision of our revised public participation statement. We expect to publish the revised public participation statement towards the end of March 2019.

## 5. List of respondents

United Kingdom Onshore Oil and Gas

Cuadrilla Resources Limited

Environmental Services Association

Anglian Water Services Limited

Four responding as individuals

Summary comments made on our charging consultation proposals for 2019

## 6. List of abbreviations

'EP Regulations' means the Environmental Permitting (England and Wales) Regulations 2016, as amended in 2018

'PPS' means our public participation statement for environmental permitting

'HPI' means high public interest

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

## Then call us on

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Find out about call charges: <http://www.gov.uk/call-charges>

## Environment first

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