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Dr Paul Leinster CBE  
Chief Executive  
Environment Agency  
Deanery Rd,  
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CC: Pam Gilder, Geoff Bateman, Ed Mitchell, David Jordan

Tuesday, 03 May 2011

Dear Paul,

We read the recent Environment Agency press release (<http://www.environment-agency.gov.uk/news/129589.aspx>) with dismay. It states that the newly formed South East Region is advertising for expressions of interest in developing hydropower on a further three of the Agency's weirs on the Thames: at Marlow, Boulters and Boveney. This is in addition to the three last year (Teddington, Bell and Sunbury), and the others it is working on with community groups (Goring and Osney, the latter being in addition to one already approved on the weir), and others which are proposed at Abingdon and Sonning.

In 2008 the Thames RFERAC was assured by the Regional Director that no other Thames weirpools would be exploited for hydropower until the first, at Romney, had been fully evaluated for its impact. Romney has yet to be built, primarily for financial reasons, and this was given as the excuse for looking for developers for the three last year, as it obviously takes time to develop a scheme.

There seems to be little effort being made to examine Romney as we understand that none of the pre-scheme evaluations has taken place, including the desk-top study of the effects of reducing flow and energy into the weirpool which was proposed four or more years ago. It should be noted that two of the weirs advertised in the latest release, Boulters and Boveney, already suffer from depleted flows due to diversion of water into the Jubilee River. The promised evaluation of that impact has also never been completed.

Surely it would be fairer on developers, and a more efficient use of the public grants which may contribute to the cost of developing and assessing plans, to carry out a catchment impact assessment before advertising for expressions of interest?

The press release also refers to the Good Practice Guidelines (GPGs) "providing guidance for the development of sustainable hydropower schemes ensuring minimal adverse environmental impact". Given that the GPGs are currently under review, following Agency-funded independent reports which stated that they are inadequate to protect fish and incompatible with delivery of the Water Framework Directive, we believe that this statement is untrue.

Weirpools are incredibly important to the habitat and fisheries diversity of heavily impounded lowland rivers such as the Thames. They are the only features that offer suitable spawning opportunities, clean gravel shallows, for flow-dependent species such as barbel, dace and chub, among other species. The concern is that reducing the flow for much of the year will degrade this habitat, a view that has been substantiated by a recent review that Fish Legal commissioned to examine the licence conditions of the recently approved schemes on the Trent.

We therefore do not agree with the statement in the press release that the Good Practice Guide allows sustainable development and protects the river environment. On the contrary, we believe that the Agency has no idea whether the schemes they are promoting on the Thames will have a detrimental impact or not. The promotion of these hydropower developments could be directly leading to the ruination of a premier angling resource and causing the failure of WFD objectives.

When we met you earlier this year, it was agreed that assessments of the cumulative impact of a series of hydropower developments on catchments would be necessary. As far as we are aware, no such assessment has been carried out on the Thames. We were at the time encouraged that you and your senior colleagues acknowledged that the active promotion of hydropower in the past by the Agency had been ill-advised. It is very disappointing indeed therefore to read a press release urging developers to come forward to plan more hydropower schemes when the catchment-scale implications have not yet been considered and the GPGs which the developers are meant use as a sustainability test are unfit for purpose.

We urge you to call a halt to any further developments on the Thames, including those promoted last year, until a full impact assessment has been completed, and to issue a withdrawal of the invitation to developers at the earliest opportunity.

Yours sincerely,

A handwritten signature in cursive script that reads "Mark Lloyd". The signature is written in dark ink and is positioned above a thin horizontal line.

Mark Lloyd  
Chief Executive