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Blueprint for Water response to the supplementary consultation on revisions to river flow and water abstraction standards for hydropower

1. Introduction

The Blueprint for Water coalition believes that, alongside energy efficiency, increasing the uptake of renewables in the UK is fundamental to reducing greenhouse gas emissions and averting dangerous climate change. We believe that run-of-river hydropower can play a part, provided that steps are taken to ensure no adverse effects to the river or associated ecosystems (such as mire, bog and wet heath systems) occur, including to hydro-geomorphology, in-stream substrate, fish, invertebrates, associated flora (such as lichens and bryophytes) and the flows required to support them. In order that the environment can adapt to climate change, we must ensure that these ecosystems are as naturally resilient as possible. We must also ensure that the legal requirements of the Water Framework Directive to achieve good ecological status (or good ecological potential) in rivers are met.

We remain concerned at the unknown cumulative impacts of multiple hydropower schemes on a river system. We are frustrated that applications continue to be granted on a piecemeal basis and believe further research on the cumulative impacts of impoundments on rivers must be prioritised and initiated now by the Environment Agency. A mechanism must be put in place to assess, with every individual application, the cumulative impacts on the catchment, so that we are not – as at present – dependent on the interpretation of individuals.

From the Blueprint for Water's Ten Steps to Sustainable Water, the following two steps may well be compromised if potential run-of-river hydropower schemes are installed without proper regard for the aquatic environment:

- Keep our rivers flowing and wetlands wet; amend or revoke those water abstraction licenses that damage lakes and wetlands;
- Restore rivers from source to sea; regenerate rivers, lakes and wetland in partnership with local communities.

We have given answers to the specific questions below.

2. Part 1: Development and extension of existing Good Practice Guidelines (GPG) standards

Question 1: Please indicate which option [of options 1 – 4] you prefer

We believe all hydropower schemes must be ecologically robust, and that on some ecologically sensitive rivers (such as those which are designated or protected) hydropower schemes should never be considered.

We believe option 3 'CAMS/ EFI standards' should be adopted for low head hydropower schemes because:

- On the basis of the available evidence of the impact of flows on fish and ecology, none of the other options come close to meeting the required level of fisheries and ecological protection;
- It provides the greatest protection of river flows and flow variability, including within depleted reaches. It ensures that the river downstream of a hydropower scheme more closely mimics the natural flows required to enable fish migration, natural fish recruitment, good angling and good river ecology;
- It is consistent with the approach taken by the Environment Agency on all other forms of abstraction. Any other option gives hydropower schemes an unacceptably low level of environmental protection;
- This approach starts from a more precautionary position and puts the onus on the developer to provide evidence to deviate from the standards, rather than the Environment Agency.

However, we feel option 1 can be adopted for high head schemes **if** the river can be shown to have no ecological significance and the proposed scheme has a high level of compensatory flow so that it will not influence the hydrological connectivity downstream.

Pre-scheme monitoring should be conducted when there is insufficient evidence of current ecological condition. Post-scheme monitoring should be conducted to ensure that these steps are being implemented and are effective. If a scheme is causing environmental damage it should cease in operation until the situation can be resolved.

Question 2: Would you like to make any suggestions for improving or amending any of the options?

The view of the Blueprint for Water coalition is that option 3 is the only acceptable option for low head schemes, but that the proposal to allow a 30% increase in the amount abstracted under the present Guidelines (up from Q Mean (average flow) to 1.3X Q Mean) is unacceptable.

On many rivers, especially those with many weirs, weirpools are exceptionally valuable habitats. The statement 'if a weirpool is of high importance... a more protective allocation or flow distribution would be required' will tend to be ignored and the default of 1.3X Q Mean applied in every case. The standards outlined for option 3, but with a maximum abstraction of Q Mean, should be the default, and any deviation only licensed if supported by evidence that no damage to fisheries, fishing, priority species or ecological status will occur.

Question 3: To help the Environment Agency and Natural Resources Wales to analyse the responses to this consultation, are you primarily interested in hydropower development in England, in Wales or both England and Wales?

England and Wales

3. Part 2: Transitional arrangements

Question 4: We will publish revised standards 12 weeks before they come into effect. Do you have any comments on this approach?

When the new guidance comes out the old system (GPG1) should be closed to all new applications and those which have not had abstraction licences granted with immediate effect. In cases between pre-application and having licenses granted, the extra 12 weeks should be granted to amend their applications in line with the new guidance.

4. Blueprint for Water coalition

The Blueprint for Water coalition is a unique coalition of environmental, water efficiency, fishing and angling organisations which call on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2015. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at www.blueprintforwater.org.uk.

This response is supported by the following nine organisations:

- Angling Trust
- Buglife – The Invertebrate Conservation Trust
- Freshwater Biological Association
- Ymddiriedolaeth Genedlaethol / National Trust
- Salmon & Trout Association
- The Wildlife Trusts
- Wildlife Trusts Wales
- Wildfowl and Wetlands Trust
- WWF

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