



Councillor Margaret Davidson
Leader of The Highland Council
Glenurguhart Road
Inverness
IV3 5NX

15th March 2019

Dear Councillors

Support to review and reverse planning applications for run of river hydropower schemes in Glen Etive:

REF 18/02742/FUL – Allt a’ Chaorainn

REF 18/05440/FUL – Allt Mheuran

REF 18/02739/FUL – Allt Ceitlein

We are the umbrella body of the Rivers Trust movement, working to protect rivers for people and wildlife across the UK and Ireland. Following representation by a number of our supporters, [The Rivers Trust](#) would like to add its voice to other organisations with concern for our wild areas, and support the action to review and reverse the decision to grant planning permission for the above named schemes.

Whilst we support the necessity to move to a low carbon economy and develop renewable energy sources, we believe that the proliferation of small run of the river hydropower schemes is not the answer, and results in a disproportionate impact on natural processes that are more valuable to society now and in the future.

Freshwater ecosystems contain more species per unit area than marine and terrestrial ecosystems. Although they cover less than 1% of the Earth’s surface, freshwater habitats are home to more than 10% of known animals and about one-third of all known vertebrate species. [The Living Planet Report](#) has shown that freshwater biodiversity has declined by 83% globally since 1970 – more than any other taxonomic group – and this has been driven primarily by habitat modification, fragmentation and destruction. Glen Etive, including Loch Etive, supports important populations of Atlantic salmon, trout and the critically endangered European eel; all of which are extremely vulnerable to changes in hydromorphology and water quality. We know that this kind of physical modification of our rivers has a significant impact on downstream river levels and flow, as well as impacting upon sedimentation, water temperature, pH, oxygen levels, and degrades habitats available to aquatic life.

Whilst we recognise the scrutiny on fisheries mitigation carried out by Argyll Fisheries Trust, we cannot be certain about the cumulative or acute impacts of schemes like this, and we see them as part of a policy that leads to death of our rivers through a thousand cuts. In the last year alone, Rivers Trusts have worked to ease fish passage, remove or partially removed over 70 man-made river obstructions like those proposed in these applications, at a cost well exceeding £1m. We fear that implementation of these schemes will pass considerable removal costs on to future generations.

The River Eive and its tributaries currently exist as a rare and extremely valuable example of unmodified, wild rivers in the UK and are classified as being at [good ecological status](#) and are not classified as heavily modified waterbodies under the EU Water Framework Directive. The Scottish Environmental Protection Agency (SEPA) states '*we must ensure that no deterioration from good status occurs, unless caused by a new activity providing significant specified benefits to society or the wider environment*'. We fear that this principle of 'no deterioration' will be compromised particularly for hydromorphology and fish barrier parameters, without providing the required significant benefits to society or the wider environment. After all, the energy proposed to be generated by the entire Glen Eive hydropower network is equivalent to less than that provided by a single offshore wind turbine.

Glen Eive is an area of significant cultural and social importance, well known by our varied supporters for its beautiful landscape and a popular amenity for walkers, climbers, cyclists, wildlife enthusiasts, anglers, outdoor swimmers, and the paddle sport community. We think that retaining a wild river with natural processes, unconstrained by human modifications, is as important to the National Scenic Area designation as any other landscape feature, and that the fragmentation of this river system should be limited as much as possible.

The energy may be renewable, but our rivers certainly are not.

Yours sincerely



On behalf of The Rivers Trust
Alistair Maltby