



5th February 2026

Your reference: DCISoldWallsS52

I am the wife and business partner of the Licence holder and have been for more than 49 years. Our way of life encompasses beef farming and our hydroelectric scheme. We have always seen ourselves as the guardian of our land and river striving to pass it all on to our family in a better condition than we took charge of it. Our farm enterprise has had a carbon negative footprint since 1995, way before it became a government idea let alone a requirement of farms. Our hydro scheme as it is now, built in 1995, has enabled us to reduce the CO2 released into the world and in our own small way mitigate what we can of climate change.

IEA Future of Energy Security summit: 24 April 2025 some quotes from Prime Minister Sir Keir Starmer:

“...energy security is national security...” “...depends on renewables...” “...home grown clean energy...”

Which is exactly what we are.

Our abilities to be the best “Guardians” has been recognised by

- Award Ashden UK runners up - presented by David Attenborough
- Dartmoor Society award inscribed “for a superlative hydro scheme”
- Bath and West diversification award presented by the Duke of Kent
- Runners up Devon County Show diversification award
- Euro Solar UK - Energy 21- Private owners award “for inspiring renewable energy projects”
- Dartmoor National Park Authority - Dartmoor First Award for sustainability
- Dartmoor National Park Authority used us as an exemplar site to share with other National Parks at their joint conference

We have hosted over 3,000 visitors to show them how our lives and business is integrated. These include:

- Adult groups including U3A. local history groups (our leat was the last to be built on Dartmoor)
- University groups including the next generation of engineering students in renewables
- Numerous primary schools who used our facilities to access many parts of their curriculum while learning about farming and green energy through experiments and models
- School for the blind for a GCSE project
- Delegation from Papua New Guinea
- A visit by our local MP Mel Stride fact finding
- A visit from the then Under Secretary of State Jonathan Shaw
- High level EA delegates on a fact-finding mission – John Aldrick and Junier Browne
- Training days for DNPA, EA and West Country Rivers Trust

The letters of thanks for many of these walks recognise the attention to detail we give to everything we do for the environment. Miles has designed and built his own fish screener, over and above our licence requirements, which the EA now want to adopt in hindsight. We designed and built the scheme ourselves which enabled us to reduce down the damage to our ancient scheduled woodland to a minimum, over the 400m of the leat. We took only 6 trees down but mitigated that by planting 800 more creating an extension to our hardwood woodland. The leat created a new habitat which has flourishing flora and fauna, including numerous mosses and ferns, orchids and double flower headed cuckoo flowers (*Cardamine pratensis*), otters (protected species) now regularly visit us, deer use the woodland and can often be seen from our house jumping the leat, dippers nest under our powerhouse, a variety of dragon flies and damsel flies abound just to mention a few. In the leat brown trout like the calmer waters and weed to hide under. When another tributary of the Dart river system (which we are on) had a pollution incident the EA officers came and electro fished our leat so they could restock the affected section with local fish, upwards of 300 fish. This help would not be available under the S52 restrictions. The EA are asking us to screen water at the intake which would deny the brown trout entry into our leat.

Not only that but how is it that the EA do not understand the force of our Dartmoor rivers. During spate you can hear the boulders moving along the bottom of the riverbed. They appear to not understand about the fist sized stones and gravel that would incapacitate the screener if it were put at the intake – as we have already proved 30 years ago when they originally insisted the screen be at the intake. After a year they accepted it was not viable and it was relocated.

The principle of being punished for doing wrong, I thought, was enshrined in our British way of life ie. innocent until proved guilty. It seems not so in the EA. Despite having conducted their own surveys in 2018 with no damning evidence., one for RSA Fish investigation the other RSA Ecology report. In conclusion to the Fish investigation “*...This report, therefore, has no evidence that the salmon decline is caused by Old Walls Hydroelectric Scheme...*” The Ecology report conclusions “*...The invertebrate survey data has been put through various tests but none have shown an ecological impact caused by the abstraction ...*” and “*...The depleted stretch showed no signs of deterioration and the volume of water remained high even after a prolonged period of dry weather...*” they still insist we be punished by effectively incapacitating of our hydro scheme.

- Salmon are still travelling up the West Webburn and spawning as they have always done, leaping our 1m weir with ease. Our weir is the same size as when it was built in 1936 to provide hydroelectricity for the farm and family before mains electricity even came to Dartmoor, 90 years ago! We have worked hard to facilitate the salmon upstream to spawn and downstream to return to the sea as smolts - without harm. Perhaps the fishermen should halt catching salmon altogether to protect them. Catch and release, which is their favoured conservation method, is only as good as each individual fisherman is at following the strict guidelines in the EAs own report of “Catch and Release”:
 - angling method
 - deep hooking
 - poor and excessive handling
 - being kept out of the water for a prolonged period

No one inspects them like they do us each and every year. Low numbers of salmon have been linked to

- Pollution: *our hydro screens the water, we regularly take plastic out from the screenings*

- Climate Change: Warmer waters and altered migratory patterns threaten salmon survival, as they rely on specific water temperatures for hatching and migration. [We are trying to do all we can to help by producing green energy to mitigate climate change](#)
- Habitat Barriers: [Our weir has been here at the same height since 1936 when the salmon stocks flourished](#)
- Overfishing and Intercropping: [Ask the fisherman why they still catch salmon in the rivers](#)
- Natural Mortality: Juvenile salmon face high mortality rates during migration, with only a small percentage returning as adults. [Evolution has dictated breeding and survival behaviours and climate change is increasing the ferocity of the storms that surge down the rivers](#)
- Conservation efforts are urgently needed to address these challenges and restore Atlantic salmon populations – [we ran a joint project with the Dart Fisheries Association* on rearing salmon fry up to smolt size to re populate the West Webburn using a spring filled granite lined pond on our farm in 2007](#)

As mentioned before the hydroelectric system at Old Walls has been working for 90 years beginning with a licence of right. Subsequently a formal licence was granted with a residual flow and upgraded to what we have today in 1995. With that in mind we have always been aware of our responsibilities to all fauna and flora (farmed or wild), the needs of our soils, air and water but more importantly the climate as it changes. This will affect every living thing on this planet and very little else can be tackled without climate change being tackled. If every person in the world made a small contribution towards mitigating climate change our children and grandchildren would inherit a better place to live and thrive in. This we have tried to do in our own small way. We monitor the farm and hydro scheme 365 days a year to ensure all is well.

Our licence was modified in 1995 but had no end date and we felt confident to invest all our life savings into the scheme at the time which would act like a pension for us whilst still doing a great job for the environment. The farming and hydro scheme is a way of life. Farming is 365 days a year as is our Hydroelectric scheme. Both get our attention every day of the year. We live and work surrounded by them, our home is on the farm and the leat that feeds the turbines water is at the bottom of our garden.

If the EA change our licence as they wish not only will our business be affected but the remainder of our lives. Our home, built physically by ourselves, and designed to use only our clean green energy will become a burden to us for the rest of our lives if these changes go ahead. We will have to buy in electricity to keep running our underfloor electric heating in all rooms, electric cooking, water heating etc. Our farm workshop is run from our own electricity, and our neighbours use our clean energy to recharge their electric car and works van as well as their home. What a backward move towards stopping climate change!

As this RSA process started nearly 20 years ago with the first EA leaflet being delivered, it nearly came to a head in 2020 then receded until 2025, it has been like a cancer in the background for at least 17 years for us personally not knowing when or if the stressful blow will come. During that time we have requested FOI packs from the EA and read some very interesting points.

In 2012 a letter to us clearly demonstrates the Dart Fisheries Association were orchestrating the West Country Rivers Trust (who had already obtained a grant to do work on our scheme), Fishtek and the EA into doing work on our site, all without consulting us! Quote “... [if you would agree to meet Pete Kibel \(Fishtek\) and Kelvin Broad of the EA at Old Walls to discuss the Works that we \(the DFA\) hope you will agree to...](#)”! What an impertinence.

The EA emails show in 2015 a conversation between the DFA and EA officers sharing information about our site at Old Walls Hydro which should not have been happening without us being included.

In 2016 in another set of emails between Kelvin Broad EA and Bill Robertson of the DFA it was finally questioned by a senior EA official Stephen Russell quote “...[First thing to consider is the RSA is confidential – we are not supposed to discuss with third parties – because putting it into the public domain could jeopardise negotiations with the operator...](#)”. After reading this we felt the EA had lost all credibility as they were blatantly breaching confidentiality rules.

You may understand why we have very little trust in the EA now therefore I do not agree with the S52 and object to it being implemented with no evidence of harm.

Regards
Gail Fursdon

A black rectangular redaction box covering the signature area.

*The Dart Fisheries Association DFA is now known as the Dart Conservation and Fisheries Association DCFA