

## Environment Agency Revised Permitting Charges

January 2018

Blueprint for Water is a unique coalition of environmental, water efficiency, fisheries and angling organisations, part of the wider environmental NGO coalition, Wildlife and Countryside Link. Blueprint members come together to form a powerful joint voice across a range of issues.

This response is supported by:

- Amphibian and Reptile Conservation
- Angling Trust
- Freshwater Habitats Trust
- The Rivers Trust
- RSPB
- Wildfowl & Wetlands Trust
- WWF-UK
- ZSL

These comments relate to proposals to increase the charges for Flood Risk Activities under the Environmental Permitting Regulations.

We recognise that the Environment Agency's Strategic Review of Charges is designed to ensure that the cost of permitting services is met by the permit holder, rather than the public. Whilst supporting the principle of cost recovery, we believe that exceptions should be made for activities whose primary purpose is the delivery of public goods such as enhancing biodiversity or where the activities will directly contribute to the Government's own objectives such as meeting the requirements of the Water Framework Directive (WFD) or Nature Directives. We believe that this could be achieved through the application of waivers or reduced charges for work whose primary aim is to benefit the environment, the application of which could be determined by local EA officers and permitting teams.

The scale of the increases proposed for charging Flood Risk Activity permits under the Environmental Permitting Regulations will often result in permitting costs being significantly higher than the capital costs of the works and act as a significant deterrent to third sector and community groups undertaking environmental enhancement schemes.

We note that there are concessions available under the Water Discharge and Groundwater Activities for organisations operating for charitable purposes and would suggest that a similar concession could be made available for Flood Risk Activities that deliver environmental improvements.

We are concerned that charges for schemes in protected areas may end up being significantly more expensive than the same scheme outside. This is because such schemes will not be able to make use of the exemptions available under the Environmental Permitting Regulations and because there may be additional non-discretionary supplementary charges for sensitive



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location assessments. Where these activities are necessary to meet the environmental objectives for the site, the individuals or organisations that carry them out should not be exposed to significantly higher costs, especially when such activities will usually already require consent from Natural England so do not occur without scrutiny.

Whilst we have raised these concerns with the Environment Agency earlier in the consultation process, we would welcome the opportunity to discuss the implications of these changes and the options that might be employed to minimise any negative impact.



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