

## **Charging for permits for flood risk activities**

We welcome the opportunity to respond to the Environment Agency consultation on charging for permits for flood risk activities. In general we support the proposal to introduce new application charges and a new compliance charge for flood risk activities under the Environmental Permitting Regulations. However, we would like the Environment Agency to explore whether waiving or reducing the fee for organisations, businesses and individuals when the projects are clearly going to help meet the Environment Agency's environmental obligations. We would also like the Environment Agency to explore whether the charging rates are likely to have been set at a level that would prevent a small organisation, business or individual from carrying out such beneficial work. Such organisations might include small Rivers Trusts or Catchment Partnerships. We fully acknowledge that the Environment Agency is under considerable funding pressures and needs to investigate alternative income, including cost recovery, to continue its vital regulatory role.

The Environment Agency often works in partnership with individuals and bodies who undertake activities on behalf of the Environment Agency. It would not seem appropriate to make the same charges for work being carried out in order to achieve the Environment Agency's aims and objectives. There are also instances where the Environment Agency funds work by bodies which will require flood risk activities. It seems unnecessary to charge for this kind of work when it is itself being funded by the Environment Agency.

The regulatory function of the Environment Agency is vital if it is to achieve its environmental obligations. We recognise therefore the need to fund this activity but it is counter-productive to impose cost on willing and effective partners whilst at the same time measuring success through the corporate plan by reducing "the administrative costs of regulation to businesses by £25 million".

A great deal of environmentally beneficial work currently requires Flood Defence Consent and will continue to do so. NGOs, charities, businesses, community groups and conservation-minded individuals currently initiate a wide range of habitat improvements to watercourses. Many of those activities support the Environment Agency's own duties under a range of legislation and assist the Environment Agency in meeting its obligations for environmental and ecological improvements under the Water Framework Directive and particularly the Habitats Directive on Natura 2000 sites. This includes work being undertaken in designated sites in order to move towards/maintain favourable conservation status. We do not believe that the same flat rate should be charged for work being carried out as part of management necessary for protected areas to meet their conservation objective and that charges in such instances should be minimised.

Currently the consultation proposes that works undertaken in these instances are charged the same as all other flood risk activities. We believe that there should be a mechanism for waiving the fee for environmental improvements carried out by Environment Agency partners and in association with the Agency and those aimed at delivering improvements under Water Framework Directive and Habitats Directive.

## **Blueprint for Water coalition**

The Blueprint for Water is a unique coalition of environmental, water efficiency and fisheries and angling organisations that is calling on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2021. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at [www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk)

If you would like to discuss any of the points mentioned above further please do not hesitate to contact the Blueprint for Water coalition at [raul@wcl.org.uk](mailto:raul@wcl.org.uk).

This consultation is supported by the following ten organisations:

- Angling Trust
- Buglife
- Institute of Fisheries Management
- RSPB
- Salmon & Trout Conservation UK
- The National Trust
- The Woodland Trust
- The Rivers Trust
- Wildfowl & Wetlands Trust
- WWF - UK

## **Wildlife and Countryside Link February 2016**



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