

January 2018

Environment Agency
Charge Proposals from April 2018
National Customer Contact Centre
PO Box 544
Bow Bridge Close
Bradmarsh Business Park
Templeborough
Rotherham
S60 1BY

Dear Sirs,

The Rivers Trust response to The Environment Agency's consultation on permitting charge proposals from April 2018

The Rivers Trust recognise that the EA, through the proposed Strategic Review of Charges (SroC), need to develop a more sustainable Environmental Permitting charging model and that there is a need for permit holders from both business and civil society to pay for permitting services provided by the EA rather than the public. However, in our role as the umbrella body for the Rivers Trust movement and secretariat and Chair of Defra's Catchment Based Approach (CaBA) we have a number of concerns with the proposals that are outlined in this document and which have also been discussed at length with the EA's Smarter Regulation team over the past several weeks. Following these discussions our primary concerns, related to the costs of permitting environmental *improvement* works, remain and we would urge the EA SroC Team to review current proposals in response to recent correspondence.

Central to our concerns are the proposed increased charges associated with Flood Risk Activities (FRA) on Main Rivers. Many of the activities which require FRA permits are essential for grant funded river restoration works planned and delivered by local Rivers Trusts, CaBA groups and various charitable organisations. The revised charges will see many of these planned smaller schemes become cost prohibitive to the detriment of the statutory EA water quality and flooding targets we set out to achieve in partnership. The current cost of permitting a listed FRA is £170 for the first activity and £40 for additional activities within an application. Under the latest proposals the FRA permit application costs for installation of e.g. an eel pass would be £764 while installation of woody debris over 25% of

the width of the stream would increase to £1,209 with a further 25% for each additional activity in the permit application, these fees would increase further when significant annual subsistence fees and pre-application discussion fees are also taken into account. In instances when these permits are required for environmental improvement activities The Rivers Trust considers the proposed revised fees to be an unacceptable cost for civil society and the charitable sector to bear.

It seems likely that under the proposed revised charging scheme that costs for permitting environmental improvement works could easily exceed the cost of delivery – this would be an insupportable position and The Rivers Trust strongly urge the EA to consider alternatives, including opportunities to allow schemes designed to improve and enhance the environment to be accepted for permit exemptions – an option not considered possible under current proposals.

The Rivers Trust are also concerned that such a significant leap in the cost of permitting and pre-application discussions, without applying a scale of incremental increases to the revised cost of permitted activities, will only encourage smaller businesses and individuals to undertake unpermitted and potentially environmentally damaging work by not engaging the EA in pre-application discussions. We would encourage the EA to consider development processes, through perhaps a charitable fund linked to permit exemptions, to assist those who might struggle with the proposed step change in charges.

Should the proposed increase in charges be applied as planned we would also be concerned that the increased charges would limit further investment from smaller businesses and individuals to enhance the environment through Water Stewardship activities and involvement in CaBA, potentially restricting investment in new innovative practices for the benefit of the environment. We would welcome any guidance on plans to utilise funds generated by the proposed increase in charges for direct investment in the environment and whether there are any opportunities to reward environmental permit holders involved in schemes delivered by local Rivers Trusts and CaBA groups with either permit exemptions for lower risk activities or reduced permit application or subsistence costs.



For the benefit of continued successful partnership working in the natural environment I would be grateful, on behalf of The Rivers Trust, our network of local trusts and partner organisations, if the concerns raised throughout this document are considered by the EA as part of the ongoing consultation process.

Yours sincerely,

Arlin Rickard
Chief Executive

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