

## Response ID ANON-JRJA-GKF8-Q

Submitted to Environment Agency water resources charge proposals from April 2022  
Submitted on 2021-11-09 23:25:04

### About the consultation

#### About you

C1. Please tell us if you are responding as an individual or on behalf of an organisation or group.

Responding as an organisation or group

If you are responding on behalf of an organisation or group, please tell us who you are responding on behalf of and include its type, for example, business, environmental group.:

ADA (Association of Drainage Authorities)

If you selected 'other' please provide further explanation to support your answer.:

C2. Please tell us how many staff are employed in your business or organisation.

Fewer than 10

C3. Are you an abstraction or impounding licence holder?

No

C4. Please tell us which primary purpose of abstraction best describes the sector you represent:

Environmental

Please provide further information to help us to understand your interest in this consultation::

Our members (Internal Drainage Boards) augment water within the lowland drainage network with water from main rivers. Transfers are to avoid environmental damage, but also feed other water abstraction uses within the lowland that are either licenced directly by the Environment Agency or exempt. Therefore the charging regime for water transfers undertaken by IDBs remains a charge that risks greater environmental harm on fragile lowland watercourse systems.

C5. Please tell us the primary region you operate in.

Please select one of the following:

National

C6. Keeping in touch

Please provide your email address if you would like to be notified when our response document is published::

ian.moodie@ada.org.uk

C7. Can we publish your response?

Yes

If you do not want us to publish your response, you need to tell us why.:

### Charge framework

1 Do you support investment in water resources management to increase future security of water supply and increase resilience to drought?

Yes

2 Do you agree with the proposal to introduce a cost reflective charging scheme where an abstractor's charge relates to the service received?

No

3 Is there any further evidence that you can supply now, or has already been published, that you think will inform the impact assessment, particularly in relation to small and medium-sized enterprises?

No

Additional comments - charge framework

Please provide further explanation to support your responses to any of the above charge framework questions, if you think it would be helpful::

ADA is concerned that insufficient consideration has been undertaken in the risk assessment upon the impact on smaller public authorities (e.g. internal drainage boards).

## Application charge

4 Do you agree with the proposal to introduce an application charge that is cost reflective of the service received? This will be dependent on the type of application being made.

No

5 Do you agree with our proposal that only customers requiring additional work are charged the relevant additional application activity charge?

Not Answered

6 Do you agree with the activities included in the additional charge factors?

Additional charge activities - Enhanced pre-application service:

Do not know

Additional charge activities - High public interest applications:

Do not know

Additional charge activities - Advertising charge:

Disagree

Additional charge activities - Water undertakers (as regulated by Ofwat) and is for the purpose or supports the provision of water supply:

Do not know

Additional charge activities - External consultation:

Disagree

Additional charge activities - Conservation assessments:

Disagree

Additional charge activities - Amending application during determination:

Disagree

Additional charge activities - Competing schemes when applications are competing for the same water:

Disagree

7 Do you agree with our proposal to charge time and materials for specific application activities?

No

8 Do you agree with our proposal to apply a discount to the application charge where an application is being made for more than one activity and those activities are reasonably considered to be part of the same operation?

Yes

9 Do you agree with the proposed approach for application charges on renewal of a time limited abstraction licence?

No

10 Do you agree with the proposed approach of charging for variations, so that the charge is proportionate to the amount of work we carry out?

No

## Additional comments - application charge

Please provide further explanation to support your responses to any of the above application charge questions, if you think it would be helpful::

ADA does not support application charges for transfer licencing related to IDB water transfers that are essential for lowland water level management, and essential for the life, livelihood and environment of England's lowlands. This is particularly given that the end abstractor users of water are already either licenced or exempt by the Environment Agency. This currently results in a form of 'double licencing' within internal drainage districts and depletes IDB funding available for local public goods and environmental enhancement.

ADA strongly objects to advertising costs being charged to IDBs for such water transfer licences. These advertising costs were not raised with ADA by the

Environment Agency throughout detailed discussions regarding IDB water transfer licencing and therefore has reduced the trust in the role and purpose of water resource regulation within the IDB sector.

It should be noted that the Environment Agency's area teams often seek the detailed local knowledge from IDBs in lowland areas such as The Fens when considering an abstraction licences linked to a lowland area in order to help them determine whether it is being over abstracted. None of this knowledge or assistance is currently charged for by IDBs. Therefore, the systems appears largely unequitable and in need of fundamental review.

ADA would also like to understand why licences held by the Canal & River Trust are eligible for a 50% discounted annual charge and not for local public water level management bodies such as internal drainage boards. This seems highly unfair given the justification given in the consultation document is 'to reflect the water conservation benefits that may result from its activities', such a statement is equally or even more applicable to the function of IDBs.

ADA questions why the Environment Agency has not engaged with IDBs or ADA specifically prior to this round of consultation, nor mention IDBs specifically within the consultation document given their critical role in lowland water management and the important function of water transfers to the health of lowland watercourses and wetlands.

## Annual charge

11 Do you agree with our proposal to introduce an annual charge that will be applied to all customers, based on the source of supply, amount of water a licence authorises and the use for that water (loss to the environment)?

No

12 Do you agree with our proposal that only customers that require additional work are charged for the relevant additional charge factors through their annual charge?

No

13 Do you agree that the additional costs incurred by us in regulating water undertakers are recovered through a separate additional charge?

No

14 Do you agree with our proposal to extend the schedule of supported sources?

No

15 Do you agree with our proposal to retain the mechanism to raise the compensation charge in the new charging approach?

No

16 Do you agree with our proposals to charge for specific activities on a time and materials basis?

No

17 Do you agree that we continue to offer an abatement of annual charges under the new charging scheme to abstractions that meet the criteria set out? This would mean that when all criteria are met, all or part of the annual charge is removed.

No

18 Do you agree with the criteria for the other special charges we propose to retain and introduce?

Other special charges - Two part tariff:

Other special charges - Winter only abstraction discount:

Agree

19 Do you agree with the principles proposed to calculate the charge for licences with more than one point, purpose, or aggregate quantities?

Do not know

20 Is the charge indicator tool helpful in working out your charge?

Not Answered

21 Would you like this tool available once the scheme is in place?

Do not know

Additional comments - annual charge

Please provide further explanation to support your responses to any of the above annual charge questions, if you think it would be helpful::

ADA does not support an annual charge applying in any form to the transfer of water undertaken by internal drainage boards that are essential to the water level management and aquatic environment of England's lowlands.

ADA considers that a broader set of abatement criteria should be considered in order to ensure that actions, watercourses and aquatic features in lowland England that support aquatic biodiversity are properly supported and not penalised by the Environment Agency's water resource charging regime.

## Feedback

How satisfied were you with this online consultation tool?

Satisfied

Please tell us if you have any suggestions on how we could improve this online consultation tool::

Please tell us how you found out about this consultation by selecting one of the following.

Social media - Facebook, Twitter

If you selected 'other' please explain why in the box below :