

## **Summary of English Nature's response to the Environment Agency's consultation on 'Review of the water abstraction charges scheme'.**

1. We agree with the principle that licensing should encompass all abstraction activities. However, we can foresee practical problems with the proposed process concerning the application and funding for some environmental licences which will be needed to meet sustainable environmental outcomes but which may require a full abstraction licence with associated costs. We would propose that where beneficial outcomes for the environment are to be achieved, a streamlined licensing process should be implemented, with a very low associated cost, if costing is at all applicable.
2. English Nature supports the storage of water (for example in winter storage reservoirs) that is abstracted during non-damaging periods, where this abstraction could otherwise damage the water dependent environment. Whilst the annual charge for this type of abstraction is reduced through the 'season' factor, we consider that environmentally sustainable abstractions should not be required to contribute to the compensation costs in order to remedy damaging abstractions.
3. English Nature is concerned about the prioritisation process aimed at tackling those licences where there is proven damage to Natura 2000 sites. Whilst we understand the need for a phased approach to tackling damaging abstractions, the criteria for prioritising action should also include measures needed to bring Sites of Special Scientific Interest (SSSIs) into favourable or recovering condition, in order to meet the Government's PSA target. To meet the requirements of the Habitats Directive, action should also be taken where there is evidence of risk of deterioration or damage to a site, but where evidence for a biological impact is not yet evident.
4. English Nature supports the inclusion of all water needs (trickle irrigation, quarry dewatering etc) in the licensing framework so that holistic water management on a catchment scale is possible. We therefore support the licensing of abstractions for environmental purposes. However where this water is essential for the natural functioning of sites designated for nature conservation, we would expect this to be prioritised over other water demands in that catchment.

English Nature.

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