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# Response form

## A consultation on 2015-16 Fees and Charges

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Question 1: Do you support the changes to EPR Waste and Installation charges where the increase doesn't fully recover our costs?

N/A

Question 2: Do you support the changes to EPR Water Quality charges where the CPI increase doesn't fully recover our costs?

N/A

Question 3: Do you support reducing the Abstraction Licencing charge to ensure cost recovery is maintained?

N/A

Question 4: Do you support us absorbing cost pressures on our other charging schemes and leaving the current charges unchanged?

Yes

Question 5: Do you support our proposal to introduce a new "Higher Application Fee" and the level at which it is set?

***No the BHA fundamentally do not support the NRW proposal to increase the charge for an abstraction licence from the current fee of £135 to £1500, an increase of 1011%. We also do not agree with the methodology behind the proposal for such a disproportionate and unreasonable increase.***

***Furthermore we urge NRW to exempt small scale hydro, such as under 50kW or under 15kW from the need to apply formally for abstraction and impoundment licences and instead adopt a registration system which would have set criteria to be met which would be checked upon the project commissioning.***

**Question 6: What other options should we explore to recover our costs in determining licences?**

***NRW need to further review their working practices to become more efficient and streamlined in delivery of services. If they improved working efficiencies, they would be able to maintain the charge at the current level of £135, with the addition of an annual RPI increase***

**Question 7: Do you support charging each time the operator requests a review of the waste recovery plan?**

**Question 8: Do you support the proposed capped annual charge for those sites still in pre-construction?**

**Question 9: Do you agree with our proposal to mirror the technical changes to the OPRA Scheme proposed by the Environment Agency, in order to maintain consistency on this particular aspect between England & Wales?**

**Question 10: Do you support our broad proposals and principles with regard to any new charging scheme for Flood Defence?**

**Question 11: Do you support the option of introducing charging for non-statutory development planning advice?**

***No the BHA do not support the introduction of charging for non-statutory development planning advice***

**Question 12: What alternatives to a charged service could be considered, recognising that such a service will need to be funded in some way?**

***NRW need to improve their processes and become more efficient in delivery of their services to negate the need make a charge.***

**Question 13: What features or aspects of our charging scheme works now and what needs to change?**

**Question 14: How can we build best practice into our future scheme?**

**Question 15: Do you have any additional thoughts or comments on what should be in our future charging strategy and scheme?**

*NRW need to reflect on the fact that all hydropower schemes are very different in terms of their scale, which differs hugely for a 5kW scheme with a typical capex of £25k, compared to a 500kW scheme with a typical capex of £2.3million, yet the same fee applies. The current charging regime for Hydropower allows for schemes of all sizes to be developed. If the proposed increase by 1011% is enforced, many schemes will not be taken forward and developed with a resultant drop in local economic activity.*

Responses may be made public – on the internet or in a report. Please see section 7.2 of the consultation for more information on this. If you would prefer your response to be kept anonymous please tick this box