

4.3.2. Non-discretionary supplementary application charges

Supplementary charges that may be payable when an application is made are set out in the associated Guidance to the EPR Charging scheme.

In particular we propose to levy fixed charges for:

- additional assessments relating to sensitive locations, odour management plans, etc.
- assessment of Waste Recovery Plans
- application amendments made during determination which require additional consultation
- advertising
- when we issue multiple information notices relating to the same issue during an application

We also propose to levy variable supplementary charges for:

- processing and returning submissions which are not 'duly made' applications (20% of the application charge, capped at £1,500)
- additional costs incurred for high public interest applications (time and materials £100 / hour)
- processing applications for novel activity (time and materials £100 / hour)

Waste recovery plans

If your application is for the permanent deposit of waste on land as a recovery activity you need to show that by submitting a waste recovery plan (WRP). You can submit your WRP either at the pre-application stage or as part of your application. You may even choose to re-submit a revised plan after a permit is granted and while deposits are taking place.

We will charge £1,231 for each new, varied or revised WRP you submit.

Consultation question

11. To recover our costs we intend to charge each time we review a waste recovery plan. Do you agree with this approach?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Non-refundable part of charge

We check your application when it arrives to make sure it is complete and we can accept it as 'duly made' that is we have enough information to start to determine your permit application. We will contact you if information is missing.

If we cannot progress past this stage for any reason we will return the application and refund the application charge less 20% to cover our costs to that point. The amount we will retain is capped at £1,500.

Consultation question

12. Do you agree with our proposal to retain a proportion of the fee to cover costs associated with processing poor applications?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Additional charge for high public interest applications

If we decide an application is of high public interest in accordance with our public participation statement, we will recover any additional costs we incur over and above the usual application charge, by way of a time and materials charge.

A site of high public interest could be a site that is already generating a lot of public interest, or have the potential to generate high public interest (whether for environmental, legal or political reasons). They typically would require more effort to determine the permit. This might encompass more time to carry out technical assessments and/or enhanced public engagement throughout each stage of the application.

We will recover our costs through a time and materials charge, given the variable nature of this additional activity. The hourly rate is £100.

Consultation question

13. Do you agree with the proposals to recovering additional costs for determining public interest applications through time and materials?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Application amendments during determination

We will charge you if you want to amend an application (before it has been determined) when that means further public consultation would be required (for example, if there is a change to the proposed operator, or where there is a significant change in activities or scale of operation)

This will be a fixed charge of £1,930. This additional charge must be paid prior to your application being determined. This is separate to the advertising charge.

Consultation question

14. Do you agree with the fixed charge approach for application amendments during determination?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Charge for novel activities

Permit applications for activities using novel activities may need additional specialist regulatory effort and we need to recover our costs.

Novel activities are those technologies, risk assessment models or approaches that we have not authorised before. There is likely to be no existing guidance or precedent proven to be acceptable. Regulating such technologies must be carefully assessed as part of the application.

We will charge for permit applications for novel activities using a time and materials charge. The rate is £100 per hour.

Consultation question

15. Do you agree with our proposal to recover costs of determining permits for novel activities through time and materials charging?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Charge for additional information notices

Where we need additional information to enable us to determine an application we will issue a notice requiring information.

Sometimes applicants' responses appear to meet the requirements of the notice but still do not provide us with sufficient information to enable a permit to be issued and we then have to issue a further notice on the same issue. This causes us additional assessment costs beyond those covered by the baseline charge and we therefore propose that, when we have to issue three or more information notices relating to the same issue, we will levy a further charge to recover our additional assessment costs.

This will be a fixed charge of £1,200 for each additional notice relating to the same issue. This will only be used when we need to request the same information more than twice. Routine requests for further information are contained within our baseline charge.

Consultation question

16. Do you agree with our proposals to charge for further information requests not covered within the baseline charge?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Variations and surrenders

If you apply to vary your permit, or if we decide to vary your permit, you may have to pay a variation charge unless the change is administrative only.

The variation charges are set out in the relevant Application Charge table in the scheme. Your application to vary can include one or more of the variation categories below if you have multiple activities

Depending on the change to the permit and the permit regime, you can apply for:

- an administrative only change (no charge)
- a minor variation at 30% of the new application charge
- a normal variation at 50% of the new application charge
- a substantial variation at 90% of the new application charge
- for Flood Risk activity permit variations we apply a fixed charge of £68 (minor variation) or £204 (any other variation)
- for variations to water discharge activity permits held by sewerage undertakers and being varied, as part of the Water Industry National Environment Programme under the 5 yearly Asset Management Plan (AMP), to secure Event Duration Monitoring we apply a fixed charge of £903
- for radioactive substances activities permit variations there are specific, fixed charges for each type of variation in each permit category detailed in the relevant Application Charge Table.

If you want to surrender part or all of your permit you may have to pay a surrender charge. This will be charged in accordance with the Application Charge tables in the scheme.

Depending on the change to the permit and the permit regime (see below), you can apply for:

- a full surrender at 60% of the new application charge
- a low risk or basic surrender at 20% of the new application charge

Consultation question

17. Do you agree with our proposal to use the new application fee as the basis for variation and surrender charges?

- Yes
- No
- Not applicable

If not, please explain why and how we might otherwise cover the costs incurred in relation to this regulatory work.

Batch transfers

A batch transfer is when a number of your permits are being transferred to a single operator at or near the same time.

The total charge in that case will be the largest transfer charge in the relevant Application Charge Table in the scheme with the additional concurrent transfers reduced by 80% of the transfer charge in the relevant Application Charge Table in the scheme.

This does not apply to batch transfers of landfill permits.

Consultation question

18. Do you agree with our approach for discounting batch transfers to a single operator at the same time?

- Yes
- No
- Not applicable

If not, please explain why.