

Response ID ANON-A5SM-J85B-F

Submitted to **Wildlife Licence Charges**

Submitted on **2018-02-02 16:24:42**

Consultees and how we will use your information

1 What is your name?

Name:

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2 What is your email address?

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3 Are you answering on behalf of an organisation or as an individual?

On behalf of an organisation

Responding on behalf of an organisation

5 What organisation do you represent?

Organisation name:

Historic England

6 How big is your organisation?

large (250 or more employees)

7 Which sector is your organisation in?

National government organisation

Other - please state:

The charging proposal

8 Do you have any comment on the proposal to introduce charges to improve delivery of the licensing service?

introduction of charges free text comment box:

Particularly in relation to bats:

It depends what 'improving the delivery' means. Often the service cannot be speeded up because monitoring is required, then takes weeks or months. As such there is not much incentive for most property owners to want licensing speeded up because the process is likely to take a long time whether or not there is a fee.

There is a serious issue in the availability of volunteers, especially in relation to bat monitoring and advising before a licence is sought, or in monitoring after works. Volunteers are not operating on the basis of income but interest, and as such cannot be hurried along by a license fee. This is especially the case in respect of bats in historic buildings.

Even when paid ecologists are involved there is no guarantee that they will be able to respond more quickly because they are funded. There are insufficient ecologists dealing with bats for them to be able to respond in a timely way during seasons when they are most required because of the annual pattern of bat activity.

The proposed charge structure

9 Do you have any comments on the proposed charge structure?

Proposed charge structure free text comment box:

To a non-specialist the various rates and charges look very complex. They will be overwhelming for people who will not achieve a personal financial gain from doing whatever works are licensed, and may be a massive disincentive to fulfil legal obligations. They also add a further layer of paperwork for volunteers caring for historic buildings, especially places of worship and churchyards, on behalf of the wider community. This seems unfair, given that householders wanting conservatories – for personal benefit and profit – are exempted from charges.

The proposed exemptions from charging

10 Do think that the proposed exemptions from charging are reasonable?

What are the reasons for your response?:

Exemptions 2 and 5b (see below) are welcome as far as they go (but more on this later), as is the exemption under the class licence for bats in churches, but it would be good if Exemption 1. Licences for preserving public health and public safety could also be applied to places of worship. These buildings are frequently used for non-worship community activities and people attending those are likely to have bat phobias in just the same way that some householders are.

Equally, many places of worship serve food and drink in addition to bread and wine during services, and doing so when areas of the building are covered with bat urine and faeces, even if they are cleared away just before serving, is extremely unpleasant. Even if there are no disease-based risks, the sheer fact that hands are on surfaces that have been contaminated (whether it shows or not) or that there is a prevailing smell of bat urine, is a public safety issue.

The consultation also refers to Defra and NE being able to review the situation when they think it reasonable to do so. It might be preferable to specify the criteria that could trigger such a review.

None of the exemptions appear to refer to urgency; in some situations e.g. badgers excavating recent burials, the situation needs to be addressed with great speed for the sake of public decency as well as health and safety. It would be useful if all such emergency licence applications could be exempt, to encourage people to make the appropriate contact with NE immediately in the knowledge that they will access expertise to deal with a crisis, rather than seek to deal with it themselves because they are worried about the cost of a licence and the time it will take to apply for one.

In relation to 5b, the definition of "Historic Properties" needs urgent revision. It should also include Registered Parks and Gardens and Registered Battlefields, both of which are eligible for agri-environment funding. Moreover, other important but non-designated archaeological sites ("SHINE sites") are also eligible for agri-environment grants and therefore also need to be included in the definition of "Historic Properties". The licence A26 for Badgers may need to be revised in the light of the above. Consideration should also be given as to whether conservation work by bodies such as the National Trust and the English Heritage Trust would also be fully covered by the definitions above - if not, the definition would need to be further widened.

2. Licences for preventing serious damage to property, including crops and fisheries.

5 b) Licences for projects whose principal aim is to maintain or improve the conservation of historic properties