



Wildlife Licence Charges Consultation

**Analysis of response to the public
consultation held between 6 Feb
and 19 Mar 2024**

July 2024



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This publication is available at <https://consult.defra.gov.uk/natural-england/wildlifelicencecharges/>

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1. Introduction

From 6 Feb to 18 March 2024, Natural England publicly consulted on a proposal to change the fees levied under the Wildlife Licence Charges (England) Order 2018.

The consultation sought consultees views on proposed new fees for survey and mitigation licences (bat and other species), and on priorities for improving the licensing service. See <https://consult.defra.gov.uk/natural-england/wildlifelicencecharges/>.

This report summarises the responses to the consultation and sets out Natural England's proposed course of action.

1.1. Background

The changes to wildlife licence charges are required because Natural England needs to:

- enable full cost recovery in line with HM Treasury principles on Managing Public Money
- introduce charges for new streamlined licensing routes, such as Bat Earned Recognition; and
- ensure funding for licensing service improvements such as digitisation.

1.2. Who was consulted?

Natural England contacted representative bodies from sectors with an interest in licensing such as environmental NGOs, as well as wildlife licence customers such as ecological consultants and developers. For example, we made the consultation available to 1300 subscribers to Natural England's Wildlife Licensing Newsletter.

The consultation received **152** responses. More than 88% of respondents were ecological consultants, 4% from environmental NGOs, and the remaining 8% from other sectors such as land management and government.

1.3. Summary of responses

On the proposed changes to:

- **Survey licence fees**, more respondents (48%) supported the proposals than not (40%).
- **Bat mitigation licence fees**, 20% were in support, 22% unsure, and 57% not in support.
- **Mitigation licence fees (other than bat)**, more respondents (39%) supported the proposed changes than not (30%).

The consultation also called for views on NE's licensing service. Feedback indicates that improving species protection was the consultees most important consideration, closely followed by giving more certainty on the timeframe for issuing licences and improving the time taken to issue licences.

2. Key Findings

There was concern over proposed charges for bat mitigation licences. In a direct response to these concerns, Natural England will reduce the accreditation licence fees for Bat Earned Recognition.

There was support for the update of charges for survey licences and for mitigation licences (for species other than bat). Natural England proposes to keep the charges as listed in the consultation.

Some respondents challenged the charge rate. [Annex 1](#) shows how the charge rate is calculated. This approach has been agreed with the Treasury and is in line with the charge rate of other similar organisations. As a result, there will be no changes to the charge rate included in the consultation.

We also respond below to comments on how the wildlife licensing service can be improved and include an outline of upcoming reforms and planned improvements.

Proceeding with proposals depends on ministerial approval, see [Next Steps](#) for details.

3. Analysis of the responses

The consultation had five sections:

1. About you: questions about the consultee
2. Survey licences: Do you support the proposed charge structure for survey licences?
3. Bat mitigation licences: Do you support the proposed charge structure for bat mitigation licences?
4. Other mitigation licences (species other than bat): Do you support the proposed charge structure for other mitigation licences (species other than bat)?
5. Service standards: What do you think Natural England should concentrate on to improve our licensing service? (Consultees were asked to rank 8 options in order of importance).

Some respondents provided comments on the third, fourth and fifth questions in their response to question 2, and this has been taken into account in the analysis below.

3.1 “About you” – Respondent Analysis

We asked whether you were answering as an individual or on behalf of an organisation.

Of those answering as an individual (116 out of 152 respondents), 95% were ecological consultants. See fig. 1 below. Note that respondents could select more than one category.

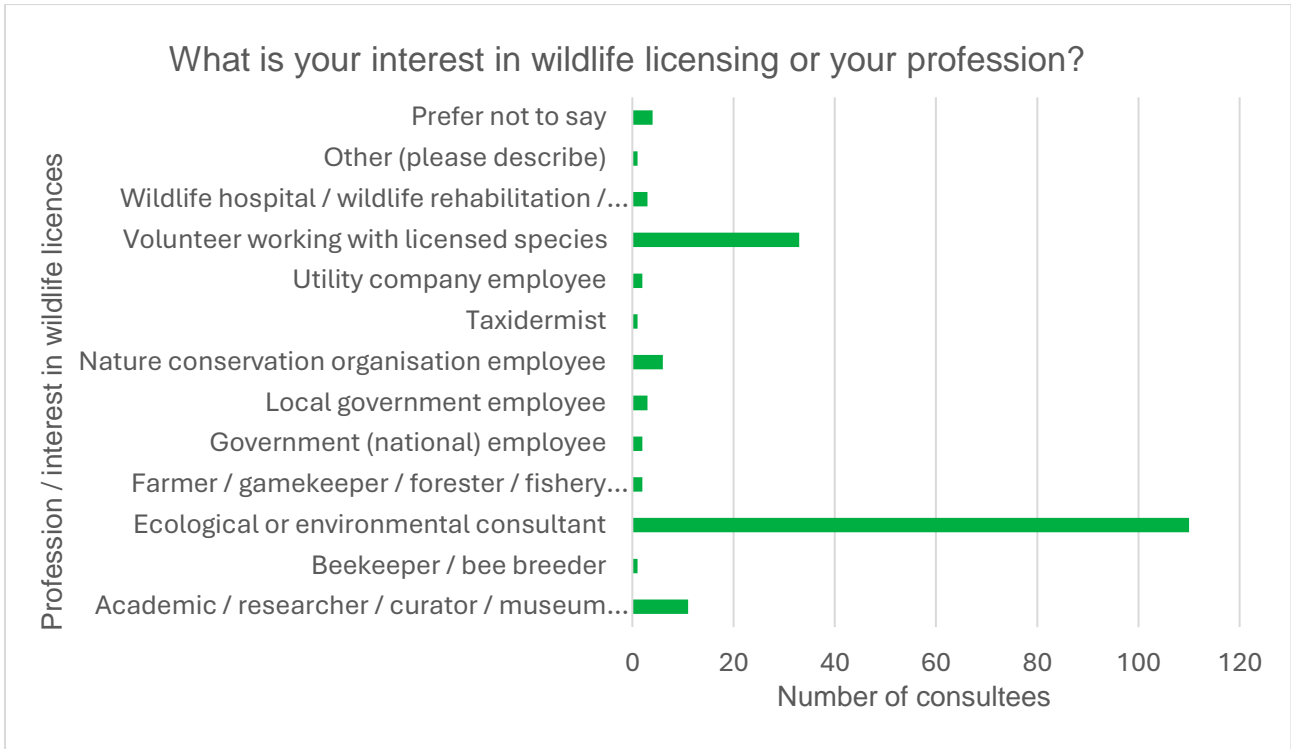


Figure1: Interest in wildlife licensing or profession (consultees answering as individuals)

Of those answering on behalf of an organisation (36 out of 152 respondents), 63% were representing ecological consultancies. See fig. 2, below.

On organisation size, most (17 out of 36) were representing “micro” organisations (0-9 employees); 10 “small” (10 – 49 employees), 4 “medium” (50 – 249 employees) and 5 “large” (250 or more employees).

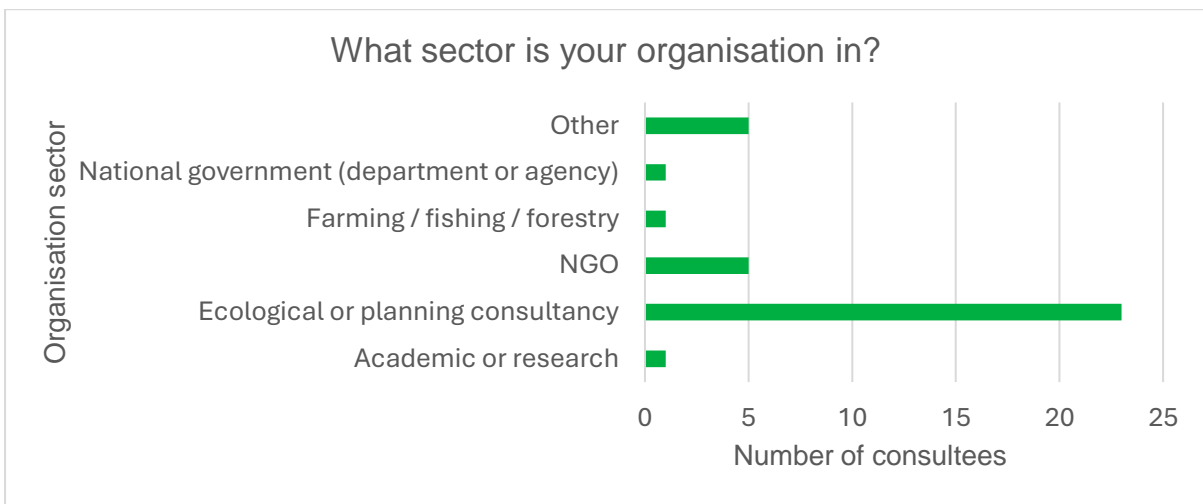


Figure 2: Organisation sector (consultees answering on behalf of an organisation)

Overall, for all responses (individual or organisation), the majority (88%) came from ecological consultants.

3.2 Proposed charge structures

We asked whether consultees supported the proposed charge structure for survey, bat mitigation and other mitigation (species other than bat) licences.

On the proposed changes to:

- **Survey licence fees**, more respondents (48%) supported changes than not (40%).
- **Bat mitigation licence fees**, 20% were in support, 22% unsure, and 57% not in support.
- **Mitigation licence fees (other than bat)**, more respondents (39%) supported the proposed changes than not (30%).

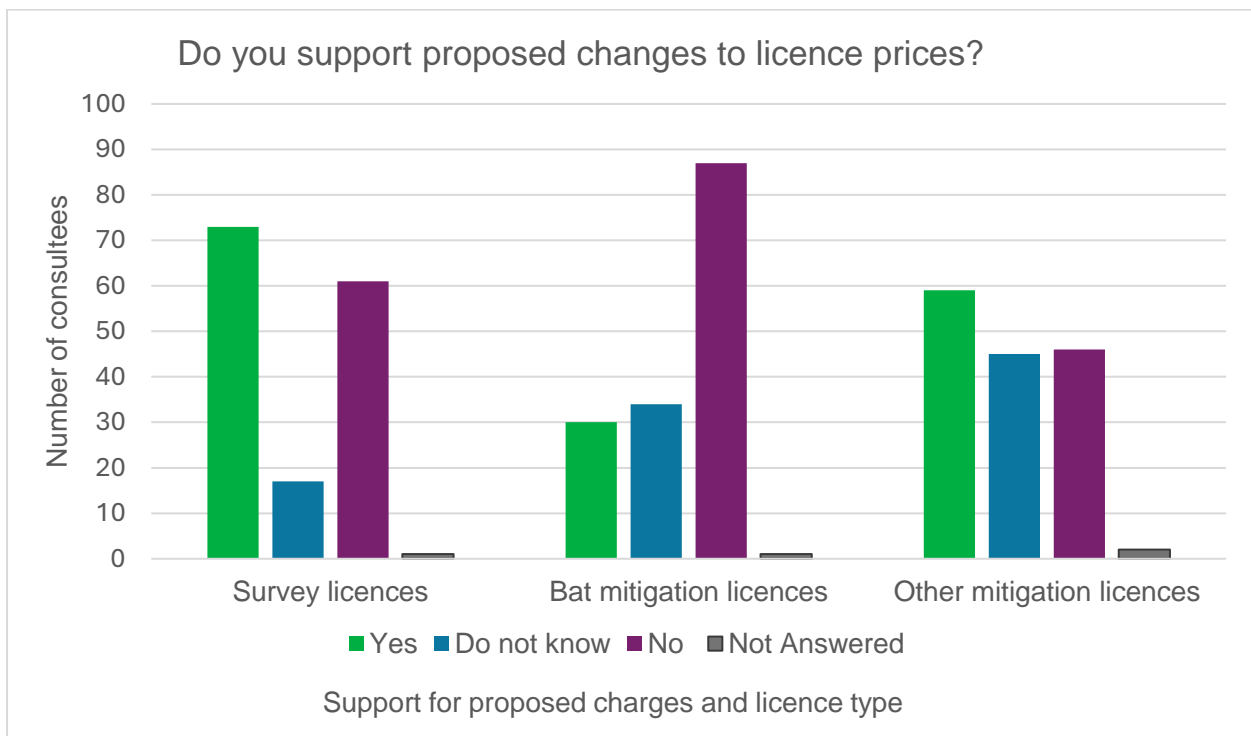


Figure 3: Support for proposed changes to licence prices by licence type

3.3 Service standards

We asked what Natural England should concentrate on to improve our licensing service. Consultees were asked to rank 8 options in order of importance.

Responses indicated that improving species protection was the most important factor, closely followed by giving more certainty on the timeframe for issuing licences and improving the time taken to issue licences. See figure 4 for the average ranking of each item by respondents.

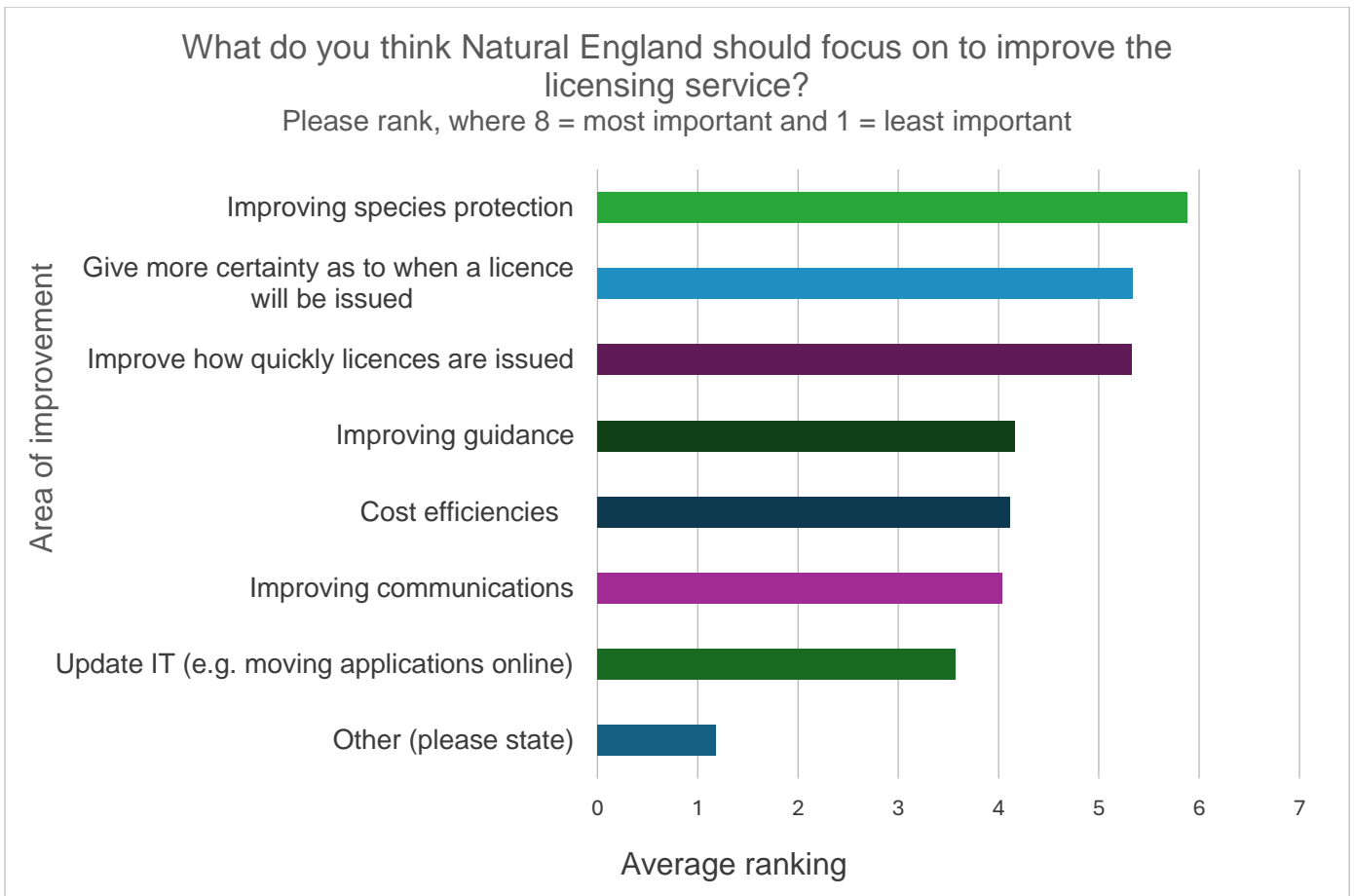


Figure 1: Ranking of areas to focus on to improve service standards

4. Summary of consultee themes in comments and Natural England’s response

4.1. Charge rate

Several respondents commented on Natural England’s charge rate of £121 p/hr and compared it to consultants’ hourly rates.

Natural England’s response

See [Annex 1](#); this outlines how the Natural England charge rate is calculated to comply with Treasury guidelines of full cost recovery. This is similar to other comparable government organisations, such as the Marine Management Organisation and Environment Agency.

4.2. Survey licence charges

As more respondents (48%) supported the survey licence fees than didn’t (40%), it is not surprising that there were many positive or supportive comments. Comments included that the new prices are “reasonable”, and approval that some prices will remain the same.

Others were supportive but with caveats that improvements are needed such as speed, efficiency and more compliance activity. Less positive comments include that the hourly rate is too high (see [4.1](#)), or that Natural England should become more efficient.

There were suggestions on how to improve the survey licence process, including changing the timing of annual renewals, moving to a 2-year renewal cycle, and adding an option to delay renewal when required by personal circumstances.

Natural England's response

As there is more support than not for the proposed charges for survey licences, Natural England proposes to keep the charges as listed in the consultation.

See [4.1](#) for our response to comments on the hourly rate, and [4.5](#) for our response to comments on service improvement.

We are grateful for all the suggestions on how to improve the survey licence process. Natural England have recently changed the bat survey licence renewal timetable to take account of licence holder feedback. We do not penalise licence holders for late submissions of licence returns and renewals due to unavoidable personal circumstances such as maternity leave. We welcome the suggestion of a 2-year renewal for survey licences and will consider this option alongside other planned improvements.

4.3. Bat mitigation licence charges

Many respondents raised concerns about the proposed **prices for Bat Earned Recognition**, especially the consultant registration fees. Suggestions included introducing a tiered charging approach and moving some cost to site registrations.

There were comments that the **Bat Earned Recognition process** needs to be quicker, more streamlined, with more knowledgeable NE assessors, and improved communications.

Natural England's response

Having come to the end of our trial phases, we have now reviewed the **Bat Earned Recognition process**. We are implementing substantial changes to consultant accreditation. These changes will make the process clearer and less time-consuming.

These efficiencies allow us to propose a reduction in the **Bat Earned Recognition price**, thus addressing this element of the concerns we have heard. We will also implement consultees' suggestions of a tiered charging approach for different accreditation levels and amending the balance of costs between consultant accreditation and site registration fees.

We have:

- reduced the consultant accreditation fee by accounting for planned efficiencies
- further reduced the consultant accreditation fee by increasing the site registration fee
- tiered prices for the 3 different levels of consultant accreditation

This enables cost recovery, whilst lowering fees for ecological consultants.

Bat Earned Recognition licences		Price proposed in consultation	New fee proposed after consultation		
			Level 1	Level 2	Level 3
Consultant accreditation	Accreditation	£2,045	£1,070	£1,370	£1,960
	Upgrade	£1,022	N/A	£370	£670
	Reaccreditation	£818	maximum £400 (exact price tbc)		
Development site	Site registration	£385	£410 (all levels)		

As per the consultation, the ‘proposed’ charges are a maximum, and continued improvement to our processes may reduce the cost further.

We also note the significant **benefits of Bat Earned Recognition** for licence customers and bats. Feedback from users is that the site registration approach provides more certainty and speed. Evaluation has also found that roll-out of Bat Earned Recognition, will also help to raise and maintain professional standards and improve outcomes for bats. Compared to A13 licences, NE has been over 50% faster at assessing Bat Earned Recognition site registrations, and accredited consultants report that these site registrations are quicker to prepare than an A13 licence. Bat Earned Recognition achieves this streamlining for all species and roost types. It has increased flexibility and easier modifications than other equivalent licences. The Bat Earned Recognition approach, and hence these benefits, can only continue if a charge is introduced.

4.4. Other mitigation licence charges

For mitigation licence fees (other than bat), more respondents (39%) supported the proposed changes than not (30%). There were some positive comments, including that proposed prices are “reasonable” and support where prices will be decreased. As with survey licences, some support was caveated with the need for service improvement.

Less positive comments focused on the hourly rate, and the need for service improvement. There were also some concerns about a potential impact of increased prices on unlicensed activity and effects on developers’ views of wildlife.

There was support for the proposal to keep the price the same for **District Level Licence (DLL) for great crested newt**, with some saying the price is too low and should be

proportionate to a development's impact. Comments on the DLL scheme included that it differs across areas, and that there are too many options for great crested newts.

On the proposed new **Species Conservation Strategy (SCS) Licences** for **dormouse**, **water vole** and **widespread reptiles**, several consultees wanted more details.

Natural England's response

With more support than not for the proposed charges for mitigation licences (other than bat), Natural England proposes to keep the charges as listed in the consultation.

See [4.1](#) for our response to comments on the hourly rate, [4.5](#) for our response to comments on service improvement; and [4.6](#) for our response to comments about impacts on wildlife.

District Level Licensing (DLL) is a landscape-scale scheme for great crested newts. For developers, it provides greater certainty and speeds up the time to get a licence. The outcomes for wildlife are similarly positive, with habitat creation for great crested newts also benefitting wider biodiversity. We will (as proposed in the consultation) keep the DLL licence fee the same as it is currently. In response to comments about the low price, note that as well as the licence fee (cost recovery for assessing and issuing a licence), there is a DLL compensation payment. This is the proportionate cost (impacts x pond tariff) to offset a development's impact. Natural England has recently increased the pond tariff, reflecting increases in costs due to inflation, both with our administration time and with pond creation, restoration, maintenance and monitoring. The pond tariff provides sufficient funds to our partners to create, manage and monitor ponds for 25 years.

In response to comments that District Level Licensing differs across areas, there are several providers, see [how to join the great crested newt district level licensing scheme](#) on GOV.UK. The Natural England led scheme is consistent across all areas it operates. Although approaches may differ across providers, they have the same goal: more habitat creation, restoration and long-term management in the best places for the species.

Species Conservation Strategies (SCS) are a new mechanism provided by the Environment Act 2021 to safeguard the future of species at greatest risk. Natural England is developing three pilot projects as well as considering how SCS might be applied outside these pilots in future. The pilots are for **water vole** in East Anglia, **widespread reptiles** in Hampshire and **hazel dormouse** in Devon and Dorset. They are focussed on evidence gathering and exploring how the regulatory system could be improved for species and licensing customers. The aim is for operational testing in two areas in 2025/26. Stakeholders and partners are already involved in the pilot areas, but, as we are in the development phase, it is too early to provide details.

We need SCS and other new approaches to ensure licensing helps achieve government biodiversity targets. The pilots aim to test whether the regulatory system can provide better outcomes for species and improve their conservation status. As District Level Licensing did for Great Crested Newts, strategic licensing schemes should also help speed up the licensing service and provide greater certainty for developers. We will monitor and evaluate the pilots, including looking at ecological outcomes, and use this to inform next steps.

4.5. Improve Natural England's wildlife licensing service

Respondents commented on areas of Natural England's wildlife licensing service that could be improved, including:

- Issuing licences faster
- Natural England assessor competence
- Communication with customers, including giving more certainty as to when licences will be issued
- Updating IT and forms
- Guidance
- Working closely with customers

Natural England's response

Natural England recognises the need for continued improvement on delivery of licences to our agreed service standard, to provide greater certainty and speed for licence users.

The introduction of charges has already enabled improvements in Natural England's service. In the last year, the percentage of licences delivered to published timescales increased from 80% to 85%. Charges fund reforms and continuous improvement which enable this progress. Two reforms (District Level Licensing for Great Crested Newts, and Bat Earned Recognition) have been particularly significant in improving speed and certainty. Great Crested Newt mitigation licence service standard is normally 30 days, but for District Level Licensing it is 10 days. The average time to issue a Bat Earned Recognition site registration in 2023 was 11 days, compared to 30 days for the A13 bat licence. Our digital reform project is also projected to improve how quickly licences are issued. With licences that have recently been digitised, the speed they are issued has improved by at least 20%. Our continuous improvement work includes improving triage systems, use of IT, management information, staff learning and development, and customer communications.

We are always looking to improve **assessor competence**. For example, we are currently providing full training refresher packages to ensure all staff have the same baseline level of skills and knowledge. Whilst we recognise the benefits of training on species ecology, we are focused on ensuring understanding of licensing tests, associated legislation and wildlife management techniques. In response to comments about the necessity of Further Information Requests (FIR), we use these where we need more details (in evidence, justification or documentation) to ensure that any licences we issue are enforceable.

We are working on improving our **communications to customers**. We have recently appointed a communications lead. It was useful to hear about where our communications are working well, and we will seek to expand this good practice. The new digital service that is being developed will also improve communications, for example it will enable automated reminders to be sent. We are currently updating and improving our "wildlife licence newsletter". You can sign up to this newsletter by going to [Hear from Natural England's Wildlife Licensing Service](#). We are working on ensuring that customers are contacted promptly with updates to their licence application progress, including by telephone where this is preferred.

On updating **IT and forms**, Natural England is developing a digital service for wildlife licensing. This will simplify the application process. Customers will be able to see their applications and licencing history. Validation within the forms will help improve data quality, which will also be improved by better data storage and handling processes. We successfully piloted a digital service for badger licensing last year. This year, the project is focused on developing internal digital systems. We are planning further revisions, based on user feedback, to the customer facing end. Whilst this digital project is being developed, we are continuing to revise our current suite of application forms and streamline processes.

Natural England's **internal guidance** for wildlife licensing assessors is written to support assessment of a licence application and is not designed to help licence customers. However, we are taking steps to make our licensing requirements more transparent as we recognise that minimal external guidance can be challenging.

4.6. Improving the licensing service for protected species

Some consultees raised concerns that price increases could increase unlicensed activity or other wildlife crime or give protected species a bad reputation with developers.

There were also comments about making the licensing system work better for species, with calls for more compliance, more focus on mitigation, compensation and enhancement, and more long-term monitoring.

Natural England's response

Since the 2018 "Wildlife Licence Charges Order", Natural England has been carefully monitoring for potential links between starting charges and impacts on wildlife. There is no evidence that the introduction of charges causes licence avoidance. The number of licences applied for and issued has remained stable before and after the introduction of each charge. This indicates that licence charges are unlikely to be causing licence avoidance. This is probably helped by the pragmatic exemptions to charges. These were strongly supported by consultees in the 2017 consultation prior to introducing charges and will remain the same once there is a new order to update charges.

Charges have been shaped to help reduce the risk to wildlife, and incentivise behaviour that benefits protected species:

- there are exemptions to charges in place for licences related solely to the conservation of wildlife,
- charges help fund an improved licensing service for the licences, reducing delays should reduce the threat of illegal acts towards wildlife,
- charges have been structured so that for most species there are a range of cheaper options, to minimise costs on applicants,
- charges help fund more compliance checks, which also improve species' conservation,
- a better resourced licensing service will be able to provide more pre-application advice and more capacity for enforcement activity where needed, both of which should improve outcomes for wildlife through the licensing service.

On compliance, we have an updated strategy for this year, with a focus on improving compliance checks. We have a system in place to use feedback and results from

compliance, so we can better target our checks to improve compliance further. Bat Earned Recognition will also help achieve this, as it has increased levels of compliance checking.

Integral to the mitigation hierarchy is the avoidance of impacts in the first instance. As such, licence applications should be the last resort. Species licensing is a protective mechanism to help avoid adverse impacts occurring and to also improve the conservation status of protected species. In recent years Natural England has worked hard to change the licensing system to focus more on mitigation and compensation, for example the [Licensing Policies for European Protected Species](#).

We are currently working on a long-term monitoring project and will communicate more on this soon. Bat Earned Recognition will help achieve better long-term monitoring, as the forms gather more details on the impacts and results of licensed works.

5. Next steps

Natural England will seek ministerial approval for the proposed new charging scheme. Subject to ministerial approval, Natural England will then work with Defra to seek parliamentary approval for the charging scheme to be introduced as a Statutory Instrument under the Natural Environment and Rural Communities Act 2006. The timetable for a new Statutory Instrument will depend on the priorities of the new government; the next common commencement date that could be possible is April 2025. Natural England will communicate a date to all licensing customers and stakeholders as early as possible.

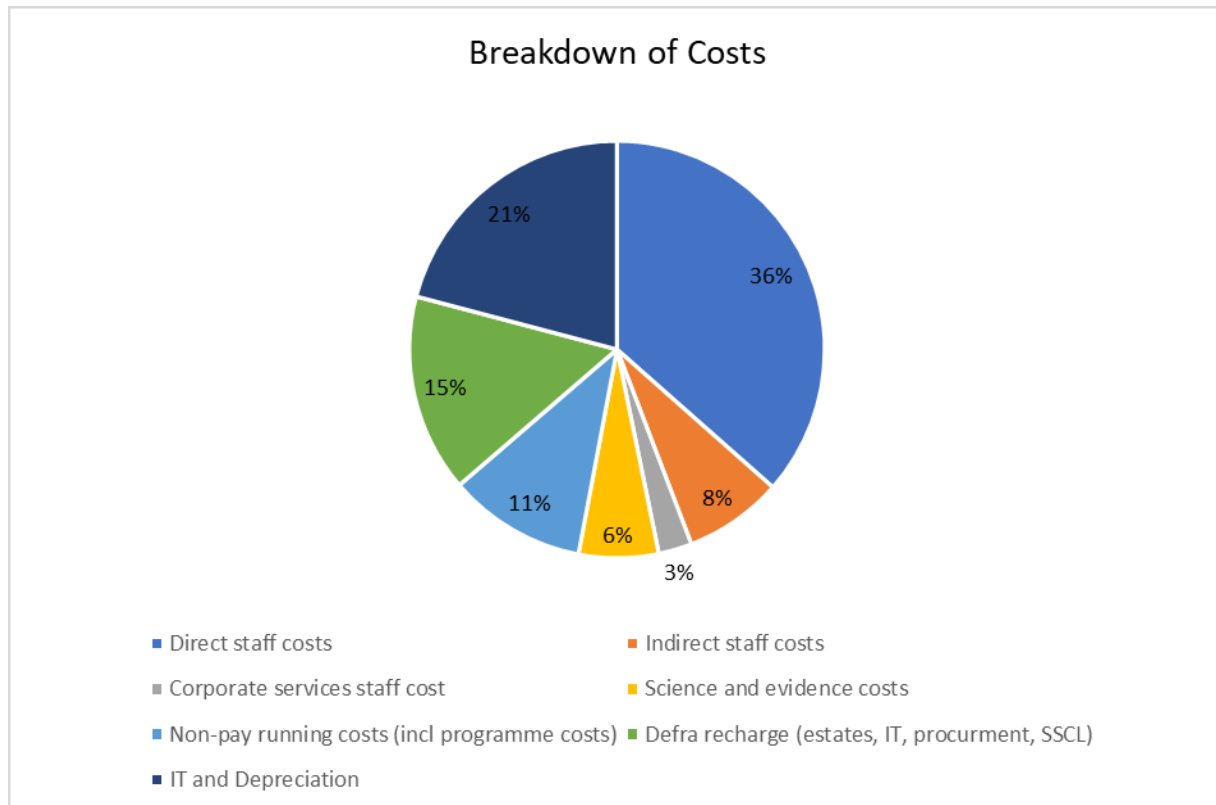
If the new charging scheme is approved, Natural England will phase in the new charges as is appropriate for the timetable of each licence.

Natural England will continue to develop system improvements. This includes improving the process for Bat Earned Recognition to ensure it works better for bats and our licensing customers. As in our response above, Natural England will also work on other improvements, such as improving communications, IT, guidance, and ensuring that the licensing system works to improve the conservation status of protected species.

Annex 1. Make-up of Natural England's costs used in the charging proposal

Consultees requested additional information on the justification for Natural England's proposed charge rate and the costs that have been included in this.

The overall costs of the wildlife licensing operation were calculated to include the following components, in line with Treasury guidance on overhead recovery. These are summarised in the chart below, along with a description of each individual section.



Direct staff costs:

These are the salary costs of all staff involved in front-line delivery of the licensing operation. Natural England uses a time recording system which captures all hours of staff time recorded against specific areas of activity, covering all areas of our work. This information is used to calculate the proportion of staff time in each team spent on wildlife licensing activity and then to calculate the proportion of overall staff costs used in wildlife licence delivery in each team, including NI and pension contribution. The entire wildlife licensing operation represents approximately 5% of Natural England's overall activity.

Indirect staff costs:

These are the costs of staff that provide a supporting role to front-line operations, for example team leaders and managers. These costs cannot be directly attributed to any particular area of front-line activity and are therefore allocated across all areas in proportion with the time spent on each area.

Corporate Services Staff Costs:

These are the central teams which provide essential support services at a national level to enable Natural England's operation. These include the legal, governance and audit functions necessary to ensure that Natural England meets the standards of propriety and regularity expected of a government body. These costs are allocated in proportion with the time spent on each area of front-line delivery.

Science and Evidence Cost:

This includes staff time and programme spend on monitoring programmes and evidence work which supports Natural England's operational activity. These costs are allocated in proportion with the time spent on each area of front-line delivery.

Non-pay running costs:

This includes non-staff expenditure such as travel and subsistence, learning and development, office equipment and consumables. Those costs that cannot be directly attributed to a specific area of activity are allocated in proportion with the time spent on each area of front-line activity.

This area also includes the cost of capital at 3.5% as per Managing Public Money and inflation representing 5% for year 1 and 2% for the remaining 4 years.

Defra recharge:

Defra charge NE a notional amount for providing corporate services such as Human Resources, Finance, Procurement, IT and estates management. These cannot be directly attributed to a specific area of activity and are therefore allocated in proportion with the time spent on each area of front-line activity.

IT and Depreciation:

This covers project costs of running the IT systems directly related to the Wildlife Licensing service. The running costs are taken to determine the average annual cost of the system and a percentage allocated to Wildlife Licensing. Depreciation relating to the capital investment of the IT system is included based on the percentage attributable to Wildlife Licensing.

Converting cost to fixed and variable charge rates:

Using the cost model above, the average cost per hour of front-line delivery activity can be calculated. Front-line delivery activity for wildlife licensing work includes:

- i. Wildlife Advisers providing technical assessment of licence applications.
- ii. Technical Services "EPS advisers" who carry out the assessment of "NSA" and "IROPI" on EPS mitigation licence applications.
- iii. Technical Services staff who log incoming applications and assess survey and some class and species management licences.

- iv. Any Senior Adviser support on the assessment of an individual licensing case (this would normally apply for complex or novel cases only).
- v. Income Enabling Team staff who manage the financial transaction, which (on variable rate work) includes collating timesheets to generate invoices.

Where fixed fees are set for licences, these are based on an assessment of the average time required from each of the above groups to complete the assessment and issue of a licence. Where a licence requires compliance checking, the same approach is used to calculate a contribution to the cost of these checks. A percentage of compliance checks to be carried out is set (5% for most licences) multiplied by the total number of licences of that type and the average staff time to complete a check (which is also dependent on the licence type) to derive an overall cost for compliance checking. This cost for compliance checking is then spread over all licences of that type and included in the fixed fee.

For licences for which the assessment time is highly variable, the rate of £121/hr is based on the cost base described above and applied based on the hours of technical assessment time (i.e., categories i., ii. and iv. as described above), with the time spent on licence processing and financial administration built into this rate (i.e. not separately itemised).

Where it is possible to take payments via bank card, the cost for invoicing can be avoided. This lowers the hourly rate needed to cost recover to £98/hr. Bank card payments can be used for fixed price, low cost, low risk licences, such as class survey licences.

The variable rate is comparable to other agencies carrying out regulatory work, such as the Environment Agency and Marine Management Organisation.

Annex 2. Summary of licence prices following revisions

	2018 price	Proposed new price
Survey licences (individual and class)		
Class survey licences (all species: barn owl, great crested newt, bat, dormouse, white-clawed crayfish) CL08, CL09, CL10a, CL10b, CL11, CL17, CL18, CL19, CL20, CL29	£60 to £80 new licences £35 annual re-registration	£104 new licence £35 annual re-registration.
Individual survey licences (bat, all other protected animals), A29, A34	£61 compliance fee + £101 p/hr	£73 compliance fee + £121 p/hr
Individual survey licence (plants), A31	£101 p/hr	£121 p/hr
Mitigation licence – class		
Ecologist accreditation for Bat Earned Recognition (fee reduced following consultation)	New licence route	Accreditation: £1070 to £1960. Upgrades: £370 to £670 Reaccreditation: up to £410.
Mitigation class licence bats: site notifications for CL21 and Bat Earned Recognition (fee increased following consultation, to enable reductions for Bat ER accreditation)	£130	£135 (Low impact) £410 (Bat ER; low, medium, high impact)
Mitigation class licences badgers; site notification, CL35	£160	£135
Mitigation class licences for great crested newt; site notification, CL33	£130	£210
Mitigation licence – individual		
District Level Licence for great crested newts, DLL	£690	£690
Species Conservation Strategy licences for dormouse, water vole, widespread reptile (if pilots successful)	New licence route	£700
Fixed price individual mitigation licence for bats, A13	£500	£500
Fixed price individual mitigation licence for hazel dormouse, A35	£690	£780
Variable price mitigation licences: A13 bat, A35 dormouse, A14 great crested newt, A44 natterjack toad, A45 otter, A46 smooth snake, A12 other EPS	£183 compliance fee + £101 p/hr	£219 compliance fee + £121 p/hr
Variable price mitigation licences: A24 badger, A11 water vole, A05a protected species	£61 compliance fee + £101 p/hr	£73 compliance fee + £121 p/hr
Sustainable use licences – licence fees set in 2018 never implemented (due to low levels of use)		
Taxidermy licence, CL07	£60	£196
A20 Sell or A21 exhibit birds without correct close rings; A28 disturb wild birds for photography, A38 sell protected species	£101 p/hr	£121 p/hr
A30 use prohibited methods for wild animals A32 remove deer from one area to another	£101 p/hr	Remove from schedule of chargeable licences

Notes for Annex 2 on licence prices

Changes since the consultation: we have lowered the fees for Bat Earned Recognition consultant accreditation, by including future time savings from reforms and marginally increasing the fee for Bat Earned Recognition site registrations.

Bat Earned Recognition licences		Price proposed in consultation	New fee proposed after consultation		
			Level 1	Level 2	Level 3
Consultant accreditation	Accreditation	£2,045	£1,070	£1,370	£1,960
	Upgrade	£1,022	N/A	£370	£670
	Reaccreditation	£818	maximum £400		
Development site	Site registration	£385	£410 (all levels)		

Survey licences permit surveying of protected species, charged where used in advance of development

Mitigation licences are used to mitigate the effect of development on protected species

Class licences ecologists can apply to hold a licence, and then submit a site notification when the licence is used; can be used on multiple sites; annual renewal / re-registration is possible.

Individual licences – usually used for a single development site.

For fixed fees, the time savings from efficiencies and reforms are included in the price.

For variable fees (priced per hour), although the hourly rate is going up by 20%, the price customers pay is expected to only rise on average by 10% due to efficiencies and reforms.

Customer choice for many actions, there is a choice of licence, with a range of prices. For example, to mitigate the effects of development on bats, suitable licences could be:

- £135 for a low impact bat mitigation licence site notification (suitable for low impact)
- £410 for a Bat Earned Recognition site registration (for low, medium and high impact)
- £500 for a fixed price individual mitigation licence for bats (low or medium impact)
- £219 compliance fee plus £121 p/hr individual mitigation licence for bats (high impact)