

RESPONSE TO CONSULTATION ON ENVIRONMENT AGENCY DRAFT SUB-STRATEGY ON ANGLING, NAVIGATION AND RECREATION

The comments on this sub-strategy should be read in conjunction with the comments on the overall draft Corporate Strategy

This draft suffers from a poor structure, is overlong and repetitive, rendering it difficult to read or see the 'big picture'. It would benefit greatly from a Vision which would then inform the sub-strategy. It would also benefit from a summary of the key legislative drivers of the Agency's role in this area.

Detailed comments are made on the draft as track changes (qv). Our main high level comments are:

1. There is an imbalance between the drive for increased access and protection of the environment – the former must not be at the expense of the latter and the need for balance should be promoted in the sub-strategy.
2. Increased access to and use of water for recreation gives opportunity for more engagement with the environment and for increased awareness of the importance of the aquatic environment. The sub-strategy should aim to exploit this opportunity which will result in more public support for its other environmental work.
3. There is welcome recognition of the importance of land and riparian owners in providing opportunities – this should be reflected in a commitment to giving them and their representative bodies a central role in such activities as Regional Water Recreation Strategy Development and the Blue Gym. With the exception of tidal waters most water recreation, including angling, is dependent on access being provided by owners and their key role should be given more prominence.
4. There is no reference to involving Governing Bodies of Sport, including Angling Trust, in delivering the sub-strategy – this is a serious omission.
5. There is over-emphasis on past and present performance and insufficient on new, firm objectives and the changes needed to deliver them.
6. The summary table has 34 actions/targets of which only nine are quantified – most of these have increases of below 5% which is within the margin of error of measurement, ie not stretching. The rest are just fine words against which delivery cannot be tested.
7. There is no clear intent to reallocate resources towards delivery of the strategy, including reversal of the drift towards production of policies and away from delivery.

Unless there is a major revision of the current draft to address these concerns SWRA/AT has no confidence that the sub-strategy will do anything to reverse the deterioration in the Agency's performance in both delivering its statutory duty towards fisheries and angling.