

# **RESPONSE TO CONSULTATION ON ENVIRONMENT AGENCY CORPORATE STRATEGY 2010 – 2015 ‘CREATING A BETTER PLACE’**

## **General**

The draft benefits from a clear structure and readability. As a result the comments below relate to the document as published.

The intended simplification of the overall strategy is welcome, but needs to flow through into the sub-strategies which would benefit from a similar approach.

Firm targets are few and selective, in both this (greenhouse gas emissions, flood defence, Biodiversity Action Plan habitats, personal water consumption) and the sub-strategies. The absence of firm targets in most areas leaves the Strategy inadequate as a driver for change or environmental improvement. It allows too much subjectivity in the assessment of future performance.

The strategy would benefit from a clear intent to use a mix of education, economic instruments and enforcement to achieve its objectives.

Most references to the benefits of a healthy environment are social and economic. More reference to the intrinsic importance and value of the environment would be welcome.

## **Foreword**

The focus on climate change is understandable. However the acceptance of climate change and its impacts is not yet echoed in either media coverage or public attitudes and behaviours. A focus on the Agency's role as educator would be beneficial.

Alongside the economic and climate challenge there needs to be reference to the population challenge – sustaining a healthy environment on a small island with a growing population will not be easy.

Under 'Our aims' we wish to see water quantity given equal importance to water quality – they are mutually dependent.

Under 'What this means for us' the intention to focus on improving the environment rather than process and procedure is very welcome but needs supporting in the strategy with an intention to transfer significant resources from policy making and strategy to delivery. There has been an unwelcome shift in the opposite direction since the formation of the Agency and it will fail to deliver the strategy without such a shift. This is especially true in the light of increasing obligations such as the Water Framework Directive at a time of downward pressure on costs.

## **1. Act to reduce climate change and its consequences**

Action on climate change will be driven by political will and ultimately dependent on public support. This requires public engagement and the strategy should include actions to secure that engagement. There is insufficient reference to reducing energy consumption alongside production initiatives.

## **2. Protect and improve air, land and water quality**

This section should focus on the intrinsic value of the environment, leaving the social and economic benefits to section 3.

There is only one reference to water quantity, which has been the Cinderella of freshwater environmental protection but is just as important as water quality and should be given equal prominence.

Given the overarching importance of the Water Framework Directive, incidentally with a common deliver date with this strategy, it is surprising not to see a specific reference to it.

### **3. Put people and communities at the heart of what we do**

There needs to be more focus on the part individuals play and could play, eg in reducing resource use, and the role of the Agency in changing attitudes and behaviour, to parallel the work with organisations.

### **4. Work with businesses and the public sector to use resources wisely**

The recognition that a quarter of all catchments are over-abstracted is welcome but there is insufficient focus in the strategy on reversing this.

### **5. Be the best we can**

The Agency is not 'the leading organisation in protecting and improving the environment' that it wants to be. It requires a culture change from bureaucracy to delivery, from focus on policy and procedure to focus on results, from self-congratulation to earned respect. The new leadership has the opportunity to deliver this change. Respected leadership is also essential to effective partnership working, the only way in which many of the strategy's ambitions will be delivered.

### **Success measures**

There are 32 success measures – only five have firm targets and only two with time frames– the rest is just fine words.

We wish to see the individual water use target at 125 lpppd and 110 in water stressed areas, in line with the Blueprint for Water recommendations.

We wish to see fish populations at optimal levels, not just sustainable levels.