



1 - Land management policy proposals

- 1 This inquiry comes at a critical time due to the need to recognise both the climate and nature emergencies and needs to examine the urgent need to take action. Welsh Government have stated, "*We face a climate emergency which is actively changing our environment and directly affecting communities; **we have an ecological emergency, where the behaviours and decisions of the human race are causing harm to the resilience of ecosystems and species***"¹.
- 2 Farming needs to play a significant role in helping to tackle the nature and climate crises and help restore the land and natural processes upon which a supply of healthy, nutritious food depends.
- 3 Therefore, we strongly support section 1.4 of the 'Sustainable Farming and Our Land' consultation, which stated that "*Sustainable food production, responding to the climate emergency and reversing the decline of biodiversity are just three of today's most significant challenges.*"
- 4 **The next ten years will be critical to halting climate change and averting an ecological disaster. We, therefore, cannot wait for the new farm payment scheme, we need to create transformative change now.** However, the Welsh Governments' *Sustainable Farming and Our Land: Proposals to Continue and Simplify Agricultural Support for Farmers, and the Rural Economy*' consultation appears to be a continuation of the current system rather than taking the opportunity to transition to public goods.
- 5 One of its main proposals is to cease payments for the 'greening' aspect (30% of Basic Farm Payment (BPS)) but not replacing it with anything. Welsh Government could ensure that the current money for 'greening' is used as a 'stepping stone' or transition to a new public goods scheme or to pilot payments for public goods.
- 6 We want to see farmers supported to play their role in reversing the dramatic declines of wildlife and the loss of species-rich habitats. But we really must start the transition to a world-leading farming system now. This is important because;
 - **Soil:** is lost at 10x the rate it is created, costing the economy in England & Wales £1.2bn a year²³. Healthy soil supports biodiversity above and below ground, stores carbon, and reduces water pollution. It can also provide private benefits to farmers through increased productivity. Farming activities that go beyond the legal, regulatory baseline,

like agroforestry, agroecological and regenerative such as organic farming, should be incentivised.

- **Pollinators:** One out of every three mouthfuls of our food depend on pollinators. But our pollinators are struggling⁴ with half of our 27 bumblebee species in decline (3 are now extinct), and two-thirds of our moths and butterflies in long-term decline
- **Wildlife:** 41% of UK species are in decline, with 17% of species in Wales at risk of extinction (but 33% of mammals at risk of extinction but 51% needing urgent action⁵ in Wales)
- **Water:** The highest proportion (31%) of pressures causing poor water health can be attributed to agriculture and land management⁶
- **Trees:** Ancient woodlands support many of our rarest wildlife species, yet up to 70% has been lost or damaged due to conifer plantations, overgrazing, and the spread of invasive species⁷
- **Air:** Agriculture accounts for 88% of ammonia emissions in the UK, contributing to wildlife loss and climate change, as well as damaging public health⁸
- Research showed increased **weather volatility**, e.g., flood and drought caused by climate change, was the second most commonly reported problem facing farmers (affecting 40%), second only to increased costs and reduced profit margins (affecting 51%).⁹

Public Support

- 7 The public wants to see our nature and climate crises tackled. Research shows that 76% of the UK public support the view that nature could contribute to economic recovery in the UK (e.g., by reducing the risk of other economic challenges such as flooding, protecting water supplies, promoting local tourism, etc.)¹⁰.

Farming Support

- 8 Recent research¹¹ shows that 50% of farmers agree with the 'public money for public goods' approach (1/3 are neutral, and only 1/5 disagree) but
 - 1/3 of farmers were taking no environmental action to deal with problems on their farms, 44% were undertaking just 1 or 2 environmental activities, 1/5 were undertaking three or more.
 - Farmers cited lack of access to capital and uncertainty as by far the biggest barriers to making environmental and other improvements to their farm business (41% of farmers experienced lack of funds access, and 41% are struggling to make changes due to uncertainty around Brexit)

Greening – an opportunity to transition to public goods

- 9 'Greening' payments should be used as a 'stepping stone' to a new public goods scheme. This could help transition land managers to the new public goods scheme by choosing one or more of the following;
 - a) funding mandatory actions likely required under the new public good scheme (as set out in the 'Sustainable Farming and our Land' consultation¹²) thereby embedding good practice and environmental sustainability now, rather than in 5 years. Examples of mandatory actions in 'Sustainable Farming and our Land' consultation are;
 - managing semi-natural habitat,
 - effective nutrient management planning, if the farm applies inputs or generates slurry,
 - having an animal health and welfare plan if the farm has livestock
 - b) allow farmers to choose one or more of thematic packages (see annexe 1)
 - c) using the 30% greening funding to transition into the new public goods by funding

either public good trials or modulating the 30% into agri-environment schemes.

- d) farmers to choose from a suite of environmental measures (similar to the national certification scheme (NCS) which was an alternative to adopting the EU default greening measures) which could contain nature-based solutions and agroecological and regenerative farming practices such as
- habitat creation options
 - regenerative agriculture techniques
 - cover crops,
 - riparian restoration and buffer zones
 - natural flood management measures such as constructed wetlands,
 - peatland restoration
 - herbal lays
 - Farm Nutrient Management Plans
 - soil health - we chemical (applications of fertilisers and pesticides including herbicides) and physical disturbance (tillage) to the soil is devastating to soil health
 - integrated pest management, including pesticide reduction target and substituting ecologically harmful veterinary products for more benign ones or pesticide-free practices¹³¹⁴¹⁵.

10 The above options provide an opportunity to deliver against a wide range of government objectives if action is sufficiently integrated¹⁶.

30% of habitats in recovery by 2030

11 In addition, using greening as a stepping stone can help achieve the active recovery for wildlife happening across at least 30% of our land and by 2030 (30 by 30). The 30 by 30 target is that set by the EU¹⁷ and the UN¹⁸¹⁹.

12 A 30 by 30 policy could comprise:

- a) Core areas in which the conservation of biodiversity is the prime purpose (e.g., nature reserves, SSSI, Local Wildlife Sites)
- b) The recovery area where habitats are restored and new habitat created, at a range of scales. and may also be protected, or may have another, compatible land use. (e.g., low-intensity grazing on species-rich grassland)
- c) Set in a wildlife-friendly landscape (both rural and urban) containing corridors and stepping-stones of habitat that provide essential ecological or environmental connections (e.g., farmland that supports wildlife).

13 The EU Biodiversity Strategy for 2030²⁰ aims that at least 30% of EU land and seas will be protected by 2030 to halt the decline of plant and animal species and restore carbon sinks to address climate change, under European Commission plans. **The document lays out measures to transform the agriculture sector – one of the EU's largest drivers of biodiversity loss²¹ – by promoting agroecology practices and making a quarter of all EU agricultural land organic in the next decade.**

14 The EU Commission said the strategy would be a central element of the EU's recovery efforts to Covid-19. The Commission argued that protecting and restoring biodiversity can have a positive economic impact on a number of sectors such as farming, fishing, and tourism and boost job creation at a time when countries are reeling from the economic impacts of the pandemic.

15 The strategy aligns with a 2030 target to protect at least 30% of land and seas proposed in the UN Convention on Biological Diversity (CBD)²². **The plan also identified agroecology as a key**

principle to increase the production of healthy food while reducing agriculture's environmental impact and increase soil fertility and biodiversity.

- 16 Other proposed measures to promote sustainable farming practices in EU Biodiversity Strategy for 2030 include
- **halving the use of chemical pesticides in the next 10 years,**
 - **ensuring at least 10% of utilised agriculture land includes diverse landscapes such as hedges, trees, and ponds that enhance carbon sequestration, prevent soil erosion and water depletion.**

Communication

- 17 We also believe that everyone should communicate a positive message about the role of land managers in tackling the climate and nature emergency through this new approach. This is also important for the public to understand how land managers are helping us fight against the climate and nature emergency – a job that runs alongside and underpins food production.
- 18 As we move to a new approach to farming, land management, and environmental expectations, new entrants may be (and hopefully will be) enticed into the sector. Ensuring that messaging reaches the wider public and business communities will give new entrants confidence and understanding. Emphasising the longer-term benefits of investing in public goods, such as building resilience to extreme weather events, is also critical.

2 - Rewilding

- 19 Within the conservation movement, and indeed beyond, there is an ongoing and controversial debate around 'rewilding'. Points of contention arise around the extent to which people are included or excluded, the requirement, or not, for management interventions and the damage to traditional ways of managing land, such as agriculture. **The Wildlife Trusts see the integration of people with nature as a key principle, and therefore, people will be a key part of any 'wilding' project.**
- 20 The Wildlife Trusts in Wales prefer to use the term 'wilding' as 'rewilding' means different things to different people and can suggest a return to ancient landscapes which is not possible. 'Wilding' offers an opportunity to reverse the decline in species and habitats using natural processes to restore our environment.
- 21 Briefly, wilding can be defined as "*a long term, management commitment to maximising biodiversity by enabling natural processes with minimum intervention. Decisions are made within a local community context and are based on the best available evidence ensuring benefits to both ecosystems and society as a whole.*
- 22 Wilder places provide a wealth of benefits to people, and 'wilding' highlights the importance of connecting people with these benefits. In some cases, where the environment is very sensitive to disturbance, it may be that access by people is controlled to avoid damaging the fragile ecosystem.
- 23 We recognise the importance of engaging with people. We need to inspire a change in behaviour and mindset as well as a connection to natural environments.
- 24 'Wilding' is part of The Wildlife Trust activity and is something we have been working towards for many years, most recently through Living Landscapes and Living Seas projects. Examples

include

- **Pumlumon project**²³ - the restoration of upland peat bogs back to their natural state, reversing the decline in wildlife and delivering ecosystem services such as soaking up and slowing down the flow of water, as well as taking in greenhouse gases.
- **Alun and Chwiler Project** – working with farmers and landowners to connect habitats, restore biodiversity and tackle diffuse pollution.
- **Re-introductions** - our current re-introduction programmes, including water voles²⁴ and beavers²⁵.
- **Working with farmers and working our own farms** – Gwent Wildlife Trusts Springdale Farm²⁶ where they, and their tenant farmers, use traditional, wildlife-friendly farming practices, including cutting the hay meadows late in the summer and using a herd of British White cattle for low-intensity grazing.

- 25** To achieve 'wilding' we are calling for the restoration of natural processes and nature-based solutions within a local context. We recognise that there is no "one size fits all". Each region and habitat type is different, as is each community, and all three will require specific approaches to enable ecological restoration.
- 26** People are critical to achieving nature's recovery. We believe that local community support is essential. We are also sure that the provision of public benefits could see new investment into rural Wales, enabling families and communities to continue to make a living. We also want to increase society's understanding to value the work of farmers and the need to support public good provision to address increasing societal issues such as flooding and carbon capture.
- 27** We also recognise that our wildlife and the natural processes within Wales are in a poor state and that hard practical work is needed on the ground to rectify this. We believe 'wilding' in Wales can be achieved through the following actions:
- controlling invasive non-native species and preventing their arrival,
 - implementing more naturalistic grazing that promotes diverse species of rich swards,
 - bringing back key species like the beaver and ensuring that the habitat is suitable for these species to thrive,
 - ensuring that there are wildlife-friendly buffer zones, stepping stones and linear strips connecting habitats,
 - restoring natural physical processes, such as soil formation and water movement, expanding native, broadleaved woodland across Wales as a natural climax community, ensuring society as a whole benefits from the land management approach,
 - reducing the negative impact people have on the natural environment, through engagement with all sectors of society, providing solutions appropriate to the individual.
- 28** We must always remember that local communities play a vital role in delivering the ecological solutions that 'wilding' can deliver. Wilding activities that engage fully with local communities are always more likely to be more successful and long-lived. This is especially true where the local community is involved in project development, and where that community can see clear benefits of the actions, be that ecological or economic.

3 - Biodiversity targets

- 29** Wales, like many countries, has failed to halt the loss of biodiversity by 2000, 2010, and now 2020. The EU Commission recognised there had been "clear implementation gaps" in the past for translating biodiversity strategies into action. It is committed to strengthening the enforcement of biodiversity objectives among member states with binding nature restoration targets²⁷. Wales must do the same.

30 Welsh Government, and public bodies, must include a commitment to deliver nature's recovery on land and at sea, within a generation as we cannot continue to live outside of our planetary limits.

31 We want to see ambitious, legally binding, and enforceable targets for nature's recovery enshrined in law and enforced by an independent Welsh Office for Environmental Protection. With post-Brexit legislation requirements, there is the opportunity to establish legal targets, sub-targets, and action plans for biodiversity for all government departments and public bodies. **This commitment will ensure a future where nature is recovering – not in decline.**

32 Commitments should include

- a) **restoring all nationally and internationally important designated sites**, Local Wildlife Sites, and nature reserves to favourable conservation status by 2025.
- b) Join the UN and EU²⁸ in committing to managing **30% of land and sea for the benefit of nature by 2030**. The EU strategy asks member states to legally designate **new protected zones and ecological corridors by 2023**. The strategy encourages governments to designate as "strictly protected" ecosystems that store carbon and other greenhouse gases, such as primary and old-growth forests, peatlands and wetlands.
- c) Ban the sale of peat-based compost in Wales by 2021. This would include being globally responsible by banning imports of peat (over two-thirds of peat used in horticulture is imported, either from Ireland or from Eastern Europe). The Committee on Climate Change recommends this²⁹.
- d) creating **20% street tree cover** in our towns and cities by 2025
- e) ensuring **all new commercial buildings include green walls and green roofs by 2025**
- f) putting the equivalent of 1% of the public health budget into preventative health care solutions by 2023³⁰.
- g) Investing in nature-based solutions is a Welsh Government priority³¹; therefore, it needs to be funded as a priority (current nature-based solutions to flooding are under well 1% of the flood prevention budget). Wales should look to spend at least 20% of the flooding budget on nature-based solutions by 2021 and increasing to 50% by 2024.
- h) prioritising new legislation on
 - Sustainable Land Management,
 - a Clean Air Act (a new report highlights that air pollution linked to 14 per cent of UK Covid-19 deaths³²)
 - Environmental governance and principles.
- i) creating a **Welsh Pesticide Action Reduction Plan** (with timetable, targets, milestone, actions) to phase out pesticide usage in Wales as required by the Sustainable Use of Pesticide Directive³³. This should include
 - **eliminating domestic pesticide use** - B&Q is phasing out the sales of the weed killer Roundup due to links to cancer in the US³⁴.
 - **eliminating municipal use of pesticides (with certain exceptions such as control of invasive non-native)** by working with public bodies to commit to phasing out pesticides through Pesticide Action Networks 3 Year Action Plan³⁵.
 - **creating at least a 50% reduction in agricultural use pesticide use (by amount and toxicity) by 2024**. This includes fully adopting Integrated Pest Management (IPM) highlighted above regarding dung beetles.

Annexe 1 - Package Theme Examples of Options

- **Winter Management Package** - Winter bird feeding, winter bird seed mixes, 100% field cover achieved through cover crops, stubble, undersowing, etc. Habitat management options. Wildlife boxes and habitat features (e.g., hibernacula).
- **Flood Risk/Natural Flood Management (NFM)** - PackageMin-till/direct drill, 100% field cover, winter bird feeding, winter bird seed mixes, trees & boundaries package options (see below), soil package (see below). Arable reversion options. It should include incentives for working with natural processes, including allowing space for water, e.g., buffers or streamside wetlands; river restoration, e.g., barrier removal/modification, gravel re-introduction, bank enhancement, INNS control; and Natural Flood Management activity such as attenuation features, in-channel large woody material features, and sustainable drainage features.
- **Water and Wetlands Package** - Habitat creation (such as ponds, in-ditch wetlands, scrapes), NFM package (see above), habitat management, manage existing features, riparian corridor management, 6-12m buffer strips, tree and shrub establishment, fencing off livestock (including troughs, hardcore bases, etc.), resource protection (RP)/CSF items. Arable reversion options.
- **Trees and Boundaries Package** - Fat hedges – 6-12m from hedge centre, single or double-sided (including buffer/hedge management strip), reduced cutting to establish more hedge volume, wildlife corridor creation, broad A shaped hedges, hedgerow gapping-up, enhanced hedge base flora. Trees – trees across slopes, in-hedge trees, in-field tree protection, fruiting tree planting Native species support – removing conifers and replant native, non-native species treatment. Stone Wall preservation. Ditch protection. Watercourses - the establishment of (25 metre) riparian corridors, including grasses, scrub, and trees. tree planting should include natural regeneration and follow the principle of planting the right tree in the right place³⁶
- **Soil Package** - Land restoration rotation 2/5 years as a cover crop or pollinator mix, include farmyard manure (FYM) spreading if increases Organic Matter and compaction alleviation, use subsoiling deep rooting and nitrogen-fixing mixes to enable active long-term build-up of organic matter in soil and prevent exploitive cropping. Integrated Pest Management options above entry criteria. Arable reversion options. Increasing the water table on peat soils.
- **Livestock Package** - Establish and protect in-field trees, low input, reduced stocking rates, FYM management, watercourse protection, animal health plans to include; antibiotic use, anthelmintic use, bonus for cooperating with neighbours to share grazing and forage, native herbal leys in rotation, holistic grazing.
- **Wildlife Package** - Habitat management options. Arable reversion options. Some whole-field options, e.g., long-term fertility building mixes (to enhance food security). Winter bird feeding and seed mixes, skylark and lapwing plots, amphibian and reptile options, habitat creation including bat, raptor, bird boxes management options CRRU stewardship. Insect – not just with a focus on pollinators; dung beetles, deadwood habitat, nest boxes, hedge base flora, fruit trees in hedges, bare earth Predators – raptors, beetle banks, maintaining old farm buildings. Basic INNS control. Wildlife boxes and habitat features (e.g., hibernacula). Beaver re-introductions and ongoing support for managing beavers in the landscape; deer management and grey squirrel management.
- **Habitat creation/restoration/management** (including woodland, wetlands, freshwater, peatland, heathland, species-rich grassland, coastal habitat, urban green space). Instream/river and on-land interventions to mitigate flooding and to manage sediment for water quality
- **Beneficial Insects and Wild Pollinators** - Habitat creation and management – ensure the big four are catered for – see Worcestershire Wildlife Trust's Wild Pollinators Farm

- Health Check i.e., forage/food/nectar; nesting habitats; wintering/hibernation; avoidance of stress (e.g., pesticides). Integrated Pest Management options
- **Combinable Crops Package** - Compaction alleviation, soil, and nutrient mapping, minimum tillage, low ground pressure tyres, landscape feature margins – 6m minimum on land, 12m minimum alongside watercourse, nitrogen-fixing break crops.
 - **Agroforestry package** - Silvopastoral - tree planting for livestock, Silvoarable - alley cropping/ tree planting
 - **Carbon habitats**
 - **Peatland Restoration** - Restoring them to prevent these emissions is one of the most cost-effective nature-based solutions to climate change. These vast stores of carbon need positive long-term management. Restored peatlands can capture more carbon, reduce flooding, clean our water, and allow wildlife to thrive.
 - **Saltmarsh** - A hectare of saltmarsh can capture two tonnes of carbon a year and lock it into sediments for centuries, but we are losing nearly 100 hectares of saltmarsh a year. Coastal realignment could restore much of it, as well as reducing flooding and erosion
 - **Wetlands** - Wetlands can accumulate carbon for centuries, but in some areas of the UK, we have lost over 90% of our wetland habitat. Restored wetlands provide rich habitat, clean water naturally, and reduce flood risk downstream. Healthy wetlands store carbon, support wildlife, and hold back floodwater. Reducing drainage and over-abstraction, the return of beavers and naturalising rivers will also lock up more carbon. Paludiculture programmes like the Great Fen Project will be vital in delivering the aims of the Peat Strategies.
 - **Cooperation** - Delivering environmental outcomes across multiple landholdings e.g., through aligning field margins with neighbours or creating insect highways across the landscape. Delivery of public goods through connecting beyond individual landholdings will need to be supported through a strong financial incentive. This could be a bonus to account for the time and effort required to engage with neighbours and agree on environmental practices to link-up the landscape. Bonuses could be proportional to the area of land included in the application that connects with neighbouring land managers and must be sufficient to encourage larger areas, such as whole fields, to be entered into applications as habitat stepping-stones. To enable land managers to identify areas where they can collaborate with others, an accurate habitat map showing their landholding and neighbouring land holdings with opportunities and suggestions for connectivity must be accessible. Suggestions could be as simple as highlighting where watercourse buffers, field margins, and linear features such as hedges could provide wildlife corridors or suggest locations where buffering local nature reserves and SSSI's or extending existing species-rich grassland habitats and woodland might be most beneficial.

In addition to the above – all should include the maintenance of protected sites and areas of semi-natural habitat, including Local Wildlife Sites. Environmental outcomes should be targeted at a local level through local habitat prioritisation via Area Statements.

Annexe 2 – References

- ¹ FUTURE WALES The National Plan 2040 (September 2020) <https://gov.wales/sites/default/files/publications/2020-09/working-draft-national-development-framework-document-september-2020.pdf>
- ² <https://www.sciencedirect.com/science/article/abs/pii/S0921800915003171>
- ³ <https://www.wwf.org.uk/updates/only-10-million-pounds-investment-needed-year-ensure-we-still-have-harvests-end-century#:~:text=The%20agriculture%20sector%2C%20which%20is,year%20in%20England%20and%20Wales.>
- ⁴ <https://www.buglife.org.uk/bugs/featured-insects/pollinators/>
- ⁵ https://www.mammal.org.uk/wp-content/uploads/2020/07/MS_RL20_Wales-1.pdf
- ⁶ https://www.wwf.org.uk/sites/default/files/2018-04/WWF_Saving_The_Earth_Report_HiRes_DPS_0.pdf
- ⁷ <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/ancient-woodland/>
- ⁸ <https://www.gov.uk/government/news/new-guide-for-farmers-to-help-reduce-air-pollution-from-ammonia#:~:text=Our%20Clean%20Air%20Strategy%20highlights,is%20harmful%20to%20human%20health.>
- ⁹ https://www.wcl.org.uk/docs/WCL_Farmer_Survey_Report_Jun19FINAL.pdf
- ¹⁰ <https://www.rspb.org.uk/our-work/rspb-news/news/stories/poll-shows-people-in-england-support-nature-in-covid-recovery/>
- ¹¹ https://www.wcl.org.uk/docs/WCL_Farmer_Survey_Report_Jun19FINAL.pdf
- ¹² <https://gov.wales/sites/default/files/consultations/2019-07/brexit-consultation-document.pdf>
- ¹³ Sands, B; Wall, R. (2016) Dung beetles reduce livestock gastrointestinal parasite availability on pasture' Journal of Applied Ecology doi:10.1111/1365-2664.12821
- ¹⁴ Beynon, S; Wainwright, W; Christie, M; (2015) The application of an ecosystem services framework to estimate the economic value of dung beetles to the U.K. cattle industry ecological entymology. Vol 40, (S1), Pp 124–135
- ¹⁵ <http://devonbatproject.org/wp-content/uploads/2017/12/Parasites.pdf>
- ¹⁶ Defra Science & Research, April 2020: The Enablers and Barriers to the Delivery of Natural Flood Management Projects. Available at: http://sciencesearch.defra.gov.uk/Document.aspx?Document=14748_APPENDIXF-CaseStudies.pdf
- ¹⁷ https://ec.europa.eu/environment/nature/biodiversity/strategy/index_en.htm
- ¹⁸ UN Zero Draft Report <https://www.cbd.int/doc/c/efb0/1f84/a892b98d2982a829962b6371/wg2020-02-03-en.pdf>
- ¹⁹ <https://www.climatechangenews.com/2020/05/20/eu-plans-protect-30-land-seas-2030-biodiversity/>
- ²⁰ https://ec.europa.eu/environment/nature/biodiversity/strategy/index_en.htm
- ²¹ https://www.eca.europa.eu/Lists/ECADocuments/AP19_09/AP_BIODIVERSITY_EN.pdf
- ²² <https://www.cbd.int/doc/c/b14d/6af5/a97c4f2c9d58203f5e2e059c/wg2020-02-04-en.pdf>
- ²³ <http://www.montwt.co.uk/what-we-do/living-landscapes/pumlumon-project>
- ²⁴ <http://www.gwentwildlife.org/what-we-do/projects/water-vole-project>
- ²⁵ <http://www.welshbeaverproject.org/home/>
- ²⁶ <https://www.gwentwildlife.org/nature-reserves/springdale-farm>
- ²⁷ <https://www.climatechangenews.com/2020/05/20/eu-plans-protect-30-land-seas-2030-biodiversity/>
- ²⁸ The European Commission set out a strategy to overhaul farming and strictly protect carbon-rich forests and wetlands, to benefit wildlife <https://www.climatechangenews.com/2020/05/20/eu-plans-protect-30-land-seas-2030-biodiversity/>
- ²⁹ <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>
- ³⁰ Response for Nature. Response for Nature. 2015. Available: https://www.rspb.org.uk/Images/responsefornature_england_tcm9-407740.pdf
- ³¹ Policy 8 – Flooding of the National Development Framework (Future Nature) states that - *Flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, **promoting nature-based solutions as a priority**. Opportunities for multiple social, economic and environmental benefits must be maximised when investing in flood risk management infrastructure. It must be ensured that projects do not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.*"
- ³² <https://academic.oup.com/circovasres/advance-article/doi/10.1093/cvr/cvaa288/5940460>
- ³³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32009L0128>
- ³⁴ <https://internewscast.com/bq-will-stop-selling-weedkiller-roundup-after-cancer-link-discovered-in-the-us/>
- ³⁵ <https://www.pan-uk.org/information-for-local-authorities/>
- ³⁶ See Cornwall Wildlife Trust's Tree Planting Guidance. Available at: <https://www.cornwallwildlifetrust.org.uk/sites/default/files/2020-04/CWT-Right-Tree-Right-Place-WEB.pdf>