

Introduction

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.
2. It seeks to provide representation to local authorities within an emerging policy framework that satisfies the key priorities of our members and delivers a broad range of services that add value to Welsh Local Government and the communities they serve.
3. We welcome the opportunity to provide evidence and comment on the restoration of biodiversity through the 'public goods programme' proposed in Welsh Government's Brexit our Land

General comments

4. The WLGA agrees that "*Welsh land matters; It provides livelihoods, supports communities and generates vital natural resources which we all rely on*". Brexit and Our Land
5. The Welsh Government is subject to the duties of the Well-being of Future Generations (Wales) Act 2015 and needs to demonstrate the application of the 5 Ways of Working in the development and delivery of the Public Goods Scheme and the Economic Resilience Schemes namely: Long Term, Collaborative, Integrated, Preventative and Involvement with stakeholders. The 5 Ways of Working should be used 'up-stream' to shape the scheme(s) from the outset and not be used 'downstream' to attempt to justify the decisions already made.
6. Brexit and our Land identified that Welsh land has the capacity to enable many things beyond economic products, for example carbon absorption, improved water quality, increased biodiversity, public health improvement through access to outdoor pursuits and activities, flood prevention, educational support and the management of our heritage. However, it should be noted that land management interventions can have an

impact upon economic yields AND the environment, habitats and biodiversity, it is not an 'either/or' scenario.

7. Changes in land management techniques can result in improvement in soil quality which can benefit yield and provide improved habitats. Consideration will need to be given as to how to recognise the public goods contribution and the consequential economic benefit and resilience. It is essential that the two schemes support each other.
8. Welsh Government will have to ensure that there is sufficient long-term funding for payment to land owners. It remains unclear at this point how much money will be available to pay for public goods.
9. Consideration needs to be given in respect of payment for 'Public Goods'; should there be a sliding scale of differing payments for place-based public goods which have a local, or regional or national benefit. (see range of spatial/place-based approaches in paragraph 13 below).

QUESTION 1: How could the Welsh Government's proposed Public Goods scheme, set out in Brexit and Our Land, be applied to restore biodiversity;

10. The Economic Resilience scheme and the Public Goods scheme cannot be seen as stand-alone schemes but rather mutually supportive.
11. There is a lack of detail on Public Goods within Brexit and Our Land on the 'how' to restore biodiversity.
12. The biodiversity needs across Wales will be different but collectively they contribute to the 'environmental well-being' of Wales. Although the delivery of public goods should be at a local level there is a need to ensure that it is considered from a local, regional or national perspective.
13. There are a range of spatial plans covering local (Area Statements), regional (River Basin Catchment Management Plans, National Parks) national (Nature Recovery Action Plan, National Flood & Coastal Erosion Risk Management Plans). The Public Goods

Scheme must ensure a joined up approach and a broad understanding as to what is required at the local, regional or national level.

QUESTION 2: How could the various existing Welsh Government policies and legislation for biodiversity restoration be applied in the design and implementation of the proposed Public Goods scheme;

14. The interdependencies between ecosystems and economic use of the land mean that biodiversity restoration may be a primary outcome, a secondary outcome or even tertiary outcome of interventions on land management.
15. There are various existing policies and legislation for biodiversity restoration which must be identified and integrated, not to remain in the 'silo' in which they were created but to be considered in an holistic approach (poor land management practices can result in soil run-off which pollutes fresh water rivers and streams; which in turn can have an adverse impact on freshwater habitats and also bathing water quality at the coast/marine environment.)
16. The Well-being of Future Generations Act *requires* public bodies to consider collaborative opportunities at the earliest stages of planning interventions. There is therefore a need for Welsh Government to specify the biodiversity outcomes they are aiming to achieve through the public goods scheme, with reference to relevant biodiversity policy and legislation. There should then be dialogue with relevant stakeholders on the best ways of achieving them. Equally, land managers should be encouraged to discuss initiatives they are planning to take forward with a range of public bodies to see where these could add value.

QUESTION 3: What lessons can be learned from the Glastir Monitoring and Evaluation Programme (GMEP) to ensure effective monitoring and evaluation of schemes to support the restoration of biodiversity. How should the new Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) be designed and implemented effectively for this purpose?

17. Insufficient detailed knowledge to comment on the effectiveness of Glastir Monitoring and Evaluation Programme to comment, however;
 18. Whatever process for modelling and monitoring is used will need to establish a baseline of current land-use from an agricultural perspective. A GIS-based approach could help achieve this, including for example the use of LIDAR.
 19. The identification of habitat and habitat improvement may require more 'on-the-ground' observation and measurement with the use of both direct and in-direct (proxy) indicators of soil and water quality being an indicator of the quality of habitat.
 20. There will need to be clarity in defining what is and what is not 'Public Goods'.
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