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<https://doi.org/10.48785/100/360>

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# NBS Policy Project: Expert Panel Feedback

Received feedback from 13 members of the expert panel, representing a range of NBS, different regions and different organisations. There was broad approval of the findings of the report. For example:

*‘It’s a great summary, particularly the highlighting of the planning frameworks, the mention of catchment partnerships and the nod to effective and integration of community empowerment, and social, health and wellbeing benefits etc’.*

*“Yes, the findings in this report are well aligned with water industry experience. The report is comprehensive and reflects the practical challenges of implementing NBS, especially in the context of fragmented policy, funding complexity, and the need for stronger evidence and community engagement”*

We then asked the expert panel four main questions:

- 1) Do you agree with the findings? What is the most important finding to focus on?
- 2) Do you agree with the recommendations? What is the most important recommendation to focus on?
- 3) Who should we target for policy support/ improvement?
- 4) Is there anything you feel we have got wrong/ anything not accurate?

Respondents expanded on issues relating to four main themes: 1) funding and private finance, 2) improving evidence 3) planning permission and 4) partnerships and governance (supporting existing effective partnerships/ local nature partnerships).

Plus respondents also felt the report could be strengthened by focusing on the need to 1) involve and empower communities; 2) achieve social, health and wellbeing outcomes (e.g. Natural Capital, Natural Health Service, Socio-Nature Based Solutions; and 3) emphasising the role of NBS in supporting climate resilience/ against the climate emergency.

## Do you agree with the findings? What is the most important finding to focus on?

Broad agreement with the findings, however improved funding systems was identified as the key challenge by most respondents. E.g ‘They are all important, I’d want to focus on coordination and funding initially, but not ignore the other findings’.

1)	Funding and private finance
Integration	<p><b>Funding barriers</b>, especially around multi-benefit projects and <b>integration</b> across existing funding schemes (ELMS, BNG, FDGIA, etc.), are the most critical in my view. Without stable and appropriate funding, other improvements (evidence base, planning reform, partnerships) cannot be sustained or scaled. In particular long term maintenance support (Local Authority Flood Risk Manager)</p> <p><b>Integration of funding</b> (including stacking) is the main focus. The other area probably is planning and permitting. NBS needs streamlining to become</p>

	<p>business as usual, and the permitting and planning aspects inhibit this (Rivers Trust)</p> <p>The critical finding is the funding challenge. The biggest barrier for the UK water industry in implementing NBS is the lack of integrated, transparent, and supportive funding and policy frameworks, especially for projects that deliver multiple benefits like water quality improvement, flood mitigation, and biodiversity (Water Company)</p>
<b>Funding certainty/stable long-term funding</b>	<p><b>Funding</b> is undoubtedly the most challenging issue for practitioners. As detailed, the often onerous requirements; relatively small funds available; and short timeframes of government funding make it very difficult to secure. Additionally, the lack of ongoing funding for maintenance can dissuade many landowners from agreeing to this on their land when there are other, more lucrative options for them through SFI etc. Making government funding fit-for-purpose; revising the rules for FDGiA to enable it to be more easily accessible for NFM projects (this is often the only option to reduce flood risk in many locations); and ensuring that those in charge of reviewing applications and unlocking funding do so in a consistent, pragmatic and transparent manner, providing feedback and the opportunity to reapply once the points raised have been resolved (Forestry)</p> <p>Completely pausing funding schemes for undisclosed periods of time at short notice. This is not only extremely disruptive, but is a major cause of loss of trust from landowners (NFM COP member).</p> <p>The biggest issue with any of NBS for funding, policy, partnerships is the lack of resource or the constant churn of resource. NBS are usually less engineered, smaller and therefore cost less than your larger infrastructure projects but as a result they are either on private land or on public land which is also used for a whole host of other community benefits. This means that making these schemes successful in terms of private landowners contributing or public acceptance and ownership of schemes, need long term trust and partnership building. This doesn't happen overnight by parachuting in some project manager or "engagement specialist" which is how a traditional flood schemes are often delivered. The way all of the authorities involved in NBS seem to be funded at present is through short term contracts for a PM, or someone to work on a strategy (LNRS) or various Local Levy funded posts so there's no consistency as quite rightly that person will be looking for their next secondment (Local Authority Flood Risk Manager)</p>
<b>Private Finance</b>	<p><b>Private finance</b> is very difficult to secure for small-scale projects, with the markets geared towards large-scale, often international projects. With many companies looking for options when completing CSRD/ESG to: mitigate their residual impacts; ensure that the ES which the company is materially-dependent upon is protected (e.g. water quality for breweries); or improve their brand's image, there is an untapped market beyond the usual credit system. With the help of the government, this could be unlocked and reduce the over-reliance on ever-dwindling, hard to secure, government funding (Forestry)</p> <p><b>Private finance</b> at the moment is that there's a lot of cost in getting projects to the point of early stage feasibility work. Never mind right up to the point of being investment ready. And there's not a lot of funding available to be doing that work. (National Parks).</p>

	<p><b>Practical support for private sector finance:</b> ‘some kind of example of how private sector funding could work would be really useful, plus a template for how public/private blended finance could work (and policy support to allow easier stacking of funding to happen) (NFM COP)</p> <p><b>Public funding crowding out private funding.</b> If you look at woodland creation at the moment, for example, there's actually pretty good public funding available for planting Woodlands and so that that decreases the incentive to look at Private markets through woodland carbon code, for example ‘Oh well, we've got most of our capital costs in 15 years of payments covered through the public schemes or why would we bother registering with the Woodland Carbon code? Because it's another cost and it's a bit of faffin we might not bother with it’. (National Parks).</p>
<b>Costs</b>	<p>Existing framework contracts used by the EA may be fit for purpose for hard engineering solutions, but for NBS the contractors often have little to no experience of delivering these types of interventions and so are a) inappropriate to deliver and b) can massively over estimate costs due to lack of experience. This means that for NBS delivered directly through the EA, framework contractors have to be used due to public sector procurement rules rather than being able to tender to a panel of specialist contractors with much better experience of the type of work. The result is that it can be very hard for the EA to deliver NBS directly at affordable rates, possibly leading to less appetite for NBS because of the poor cost:benefit ratio and bureaucracy involved. All of this needs simplifying to ensure the taxpayer is getting good value for money and EA staff are empowered to use NBS solutions more not less. (NFM COP)</p>

	<b>Other key findings: Evidence, Planning Permission, Governance, Community Involvement</b>
<b>Improving the evidence base</b>	<p><b>Make Evidence</b> that is available better known and work harder to make its case - these things are still considered niche despite ample demonstration of effectiveness in some cases. Yes in terms of the findings you have made - regarding monitoring it could have been a bit more specific about what could be changed to improve the evidence base - ie go beyond more work and more funding being needed. I'd suggest some further information should be added regarding NBS for health outcomes - see Q 4 (Wildlife Trust)</p> <p>Worth also stressing that <b>a true large catchment scale study</b> has yet to be published, probably due to there being few, if any, catchments in England with NFM delivered extensively and at full catchment scale to date. All the more reason to make delivery/funding/landowner incentivisation easier (Environment Agency)</p>
<b>Planning</b>	<p>The planning requirements for NBS are outrageous considering they are in many cases delivering key targets for Local Authorities and National Government. The process needs to be made easier and more streamlined for these types of project which are positively impacting flooding/biodiversity etc, or ideally NBS within reasonable limits should be made permitted development [NFM COP]</p>

	<p>Many local authorities are unfamiliar with this type of work, and may respond in an inconsistent way. We should learn more from the current field trials, where WRE are currently applying for permissions from local councils. I'm hoping that some runoff attenuation features can be regarded as agricultural developments which don't require planning permission. (Environment Agency)</p> <p>The other area probably is planning and permitting. NBS needs streamlining to become business as usual, and the permitting and planning aspects inhibit this (Rivers Trust)</p>
<b>Governance</b>	See comments below around supporting Local Nature & Catchment Partnerships: are examples that are working (Wildlife Trust)
<b>Support Communities</b>	<p>Angry flooded communities need Community <b>Solutions</b> and Resilience that share best practice and build local capacity to help the overwhelmed RMAs as it's our risk not our RMAs. Communities have a duty of care, have unlimited capacity and professional skills, local knowledge, assess to community landowners through friends of friends. Nothing happens without trust and community landowner agreement. We've met with [anon] EA national community flood resilience advisor, but there is <b>no funding</b> for positive change to promote Community Solutions and Resilience (Community Volunteer)</p>

## 2) Do you agree with the recommendations? What is the most important recommendation to focus on?

Broad agreement with the recommendations. Most important recommendation to focus on again mainly around funding, although other recommendations were made including funding NBS advisory boards/ partnerships/ specialist staff at national and regional levels; and building in socio-health and wellbeing strands:

<b>Simplifying and aligning government funding</b>	<p>Simplifying and aligning government funding mechanisms. Unless funding aligns with the real-world complexity of NBS (multi-benefit, cross-sector, long-term), implementation will remain limited. This also has a knock-on effect on enabling better evidence collection, community engagement, and attracting private investment. (LAFRM)</p> <p>Most Important Recommendation for the Water sector is "Simplify and strengthen government funding mechanisms (including FDGIA, ELMS, SFI, and BNG) to enable long-term NBS projects". This is important, because,</p> <ul style="list-style-type: none"> <li>• Multi-benefit projects need flexible funding - Water companies often implement NBS that deliver multiple outcomes, flood mitigation, water quality, biodiversity, and carbon sequestration. Current funding streams are siloed and not designed to support such integrated projects.</li> <li>• Catchment-Scale interventions require long-term investment - NBS like wetland creation or riparian buffer strips need sustained funding for planning, implementation, and maintenance. However current</li> </ul>
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	<p>short-term funding or narrowly focused grants do not support long-term commitments.</p> <ul style="list-style-type: none"> <li>• Unlocking private sector co-investment - Simplified and stable public funding frameworks can de-risk projects and attract private investment, especially through green finance mechanisms like carbon credits.</li> <li>• Regulatory alignment - Water companies operate under strict regulatory frameworks (e.g. Ofwat, Environment Agency). Clear, supportive funding mechanisms aligned with these regulations would make it easier to justify and scale up NBS. (Water Company)</li> </ul>
<b>Private sector funding</b>	Using public funding to prime private sector investment e.g. build evidence base. Use of climate emergency also very important to bring in private investment (National Parks)
<b>Modelling/ Cost benefit analysis</b>	<p>Highlighting the cost-benefits of NBS to the Treasury and providing evidence of this could help to unlock further funding for NBS (Forestry)</p> <p>Modelling and then even more to start ground tracing and monitoring the impact over time and all of that is where is with woodland carbon. We've got to the point where you plug your project into an Excel spreadsheet and it gives you some numbers that you can then run a tis which say it's a really different. (NFM COP).</p>
<b>Evidence/ M&amp;E</b>	Good starting point would be agreed 'bronze/silver/gold' standard M&E approaches so everyone working in the sector is at least trying to follow a similar protocol and produce comparable datasets. I think it could be made pretty straightforward so it's understandable by anyone from researchers/scientists through to project managers/community groups working on NFM for the first time (NFM COP)
<b>Planning Permission</b>	<b>Planning permission</b> and frameworks are easily within the government's power to change in a relatively short time period. Everyone knows what is required, the government is already revising planning to be pro-development, so in the process, they could ease the way for changes to enable NBS to help mitigate some of the impacts of this development. A clear framework which is adhered to by all planning authorities is essential, stating when a project can be considered "permitted development", what requires planning permission, and a standardised, transparent process for applications with strict timeframes which the authority must adhere to (Forestry)
<b>Governance: Supporting existing successful partnerships</b>	<p>Provide long-term support to local NBS partnerships which involve a wide range of stakeholders including local communities. You have referred to <b>Local Nature Partnerships and Catchment Partnerships</b> - both operate successfully in my area of England and are already working on and promoting NBS. For example Dorset LNP has led on co-ordinating between nature and health sector and this has really been welcomed by the Public Health bodies (Wildlife Trust)</p> <p>Definitely - more <b>Communities of Practice</b> needed covering all the regions of England (and other UK countries?) with potential for sharing knowledge between regions too (NFM COP)</p>

	I've been working in partnership with Water Resources East (and their partners Nature Conservancy), Defra and MHCLG to deliver field trials of NBS for water resources benefits. It has been a learning curve, but I think the partnership has worked successfully so far (Environment Agency)
<b>Governance: establishment of NBS national and regional bodies</b>	<p>NBS needs a <b>single customer focused Authority</b> to champion change and build synergy between the overwhelmed and underfunded RMAs, River Trusts and Wildlife Charities (Community Volunteer)</p> <p><b>An independent, industry-led advisory panel</b> made up of NBS practitioners from a range of organisations encompassing environmental NGOs (including catchment and local nature partnerships), contractors, local authorities, landowners and community groups should be brought in who can advise Defra/the EA on policy direction, bring real-world context to the challenges faced by current policy, and hold them to account when necessary. This panel needs to be given real teeth and the ability to shape policy and push through changes to ensure it is “fit for purpose” now and into the future (Forestry)</p>
<b>Regional NBS/ NFM specialist staff to support projects</b>	‘Our RFCC fund one brilliant NFM specialist who looks after [2] catchments’ (Community Volunteer)
Making a case for <b>health and wellbeing</b> links	<p><b>Learning from Successes:</b> What can we learn from successful investments in this space to help clarify the value for money (VfM), social return on investment (SROI), and other metrics required by the market? I can see mention of “Developing a clear, practical, and rigorous approach to GBI cost-benefit analysis that is ready for HM Treasury appraiser approval “ on the iCASP website. Is there anything which can be said here along those lines to lay out the benefits of NFM against other options?</p> <p><b>Scoping and Prioritisation:</b> How can we most effectively scope, prioritise, and assess existing/potential projects given what works, in line with market development stages—from proof of concept to product development to scaling up—and the associated investment-level metrics?</p> <p><b>Aligning with Policy Drivers:</b> How can you create a clear line of sight between these metrics and key policy/investment drivers linked to health and nature—such as economic growth, skills development, and early years outcomes? Do we have the segmentation on how the NFM projects could or do address specific issues, such as health inequalities, or NHS targets around air, physical activity, obesity, and shift from treatment to prevention, hospital to community?</p> <p><b>Strategic Messaging and Influence:</b> Following this, which messages are most likely to resonate with key policy, commissioning, and funding audiences —“nature-based solutions for population health”, “environmental public health infrastructure”, “whole-place wellbeing economics”... or something else?</p> <p><b>Cross-Sector Learning:</b> How can we best foster multi-remit and cross-sector learning to support and strengthen this work?</p>

	<p><b>Widening Buy-In Through Natural Capital:</b> Is there an opportunity to generate broader buy-in by linking the benefits for nature (as outlined in <a href="#">NERR137 Edition 1 State of Natural Capital Report for England 2024 – risks to nature and why it matters - NERR137</a>) with the <a href="#">UN Sustainable Development Goals</a>, thereby mapping outputs to wider outcomes and more specific metrics?</p>
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### 3) Who should we target for policy support/ improvement?

<b>Need to link to existing policy positions/ statements</b>	My main thought is around how it links to existing policy positions/statements? To bring about the recommendations, which I do agree with, there are a multitude of existing policies that need changing and or linking Rivers Trusts)
<b>Ministers and politicians</b>	<p>Emma Hardy, Flood Minister (Community Volunteer)</p> <p>Government, particularly Steve Reed, MP and other influential staff within Defra, the heads of the EA, NE and FC. Having attended a Comment Central event earlier this year, Barry Gardiner MP Environment Audit Committee and Dr Roz Savage MP Climate and Nature Bill were very keen to support improved policies and processes in this area, and were not afraid to hold government to account. Gaining support from MPs around the country who can see the benefits of NBS is also important to ensure enough pressure is put on decision makers to support the changes necessary to enable NBS (Forestry)</p>
<b>Government Ministries and Departments</b>	<p>UK central government (DEFRA, DLUHC, Treasury) — especially regarding funding structures, planning policy, and national coordination (LAFRM)</p> <p>Defra may be able to offer some policy support, they are involved in oversight and funding of some of the field trials in the Cambridge area (Environment Agency)</p> <p>Government departments - and within that a major issue is that there are often different departments and arms length bodies within departments. With NBS it is often within the remit of several parts of the Environment Agency, Natural England, probably Defra itself and maybe MHCLG. Co-ordination and a common level of support for these mechanisms is important. It was really helpful that a recent EA publication supported NBS, as opposed to hard (concrete) engineering solutions, where appropriate. (Wildlife Trust)</p> <p>Highlighting the cost-benefits of NBS to the Treasury and providing evidence of this could help to unlock further funding for NBS in collaboration with support from those listed above (Forestry)</p>
<b>Government Agencies</b>	The Environment Agency's future funding team may also be worth contacting (Environment Agency)
<b>Other institutions including local government</b>	Outside of [central] government, the NFU, CLA, CABA, Local Authorities, LINK, British Retail Consortium (to target the major supermarkets and businesses working with landowners and with the ability to influence their uptake) are all important. Water companies are vital to this as more funding from fines is released for NBS, to ensure the barriers to

	<p>utilising this funding are removed. Those involved in green finance and keen to see NBS move forward in the UK are important (Forestry)</p> <p>Ofwat, Local Authorities &amp; Combined Authorities, Catchment-Based Partnerships (Water Company)</p>
<b>Other NBS projects</b>	The [Ofwat] Mainstreaming Nature-based Solutions programme should be helpful (Environment Agency)

#### 4) Is there anything missing/ wrong/ or too simple?

<b>Funding:</b>	<p>Some sectors e.g. the water industry lack confidence to invest because NBS can be slow to deliver benefits at scale compared to conventional ‘end-of-pipe’ solutions. Landowners also need to know that they will receive funding and confidence that the interventions will contribute towards wider catchment sustainability, even if they don’t receive direct benefit themselves (Environment Agency)</p>
<b>Private finance</b>	<p>Be cautious of overstating the short-term potential of private finance. Clarify that while it is promising, significant public investment and risk-sharing mechanisms are still needed in the near term (EN, BC)</p> <p>The report could be enhanced by providing more detail on how to unlock and structure private sector investment in NBS, such as through carbon markets or blended finance models (Water Company)</p>
<b>Evidence</b>	<p>The NFM Evidence Directory is a great source of evidence, however it remains very biased towards flood risk reduction interventions, with much less evidence in relation to other benefits e.g. water resources. I’ve recently commissioned a ‘nature based solutions for water resources’ handbook (being written by JBA consulting) which summarises some of the water resources evidence to date. WRE have also produced an NBS monitoring guide (written by UEA). (Environment Agency)</p>
<b>Monitoring &amp; evaluation</b>	<p>There needs to be more monitoring of the impact of measures installed by landowners using the various government grants. Identifying the benefits, for example, of riparian tree planting by a landowner on reducing downstream flood risk, improving water quality or biodiversity needs to be identified and factored into any future NBS to identify which measures will compliment this. (Forestry)</p> <p>Any measures a landowner wishes to install as part of SFI or other government grants in an area where an NBS project has taken place must be screened to ensure that they complement the project, and do not negatively impact its outcomes. Having an easily accessible, <b>comprehensive database or portal with all NBS projects</b> (either utilising the CABA portal which needs to be updated regularly makes sense) would ensure that these issues do not arise. (Forestry)</p>
<b>Governance</b>	<p>Recommendation 6 is already taking place and has been for some time in various guises. Some catchment partnerships are already the lead organisation on NBS in a catchment (e.g. NW Norfolk, N Norfolk, Hull and East Riding), but regardless of what stage CPs are at, they and the organisations comprising the partnerships, need more resources and funding to lead NBS than the small amount provided by the EA on an annual basis. This needs to</p>

	<p>be resolved. CPs need to collaborate in a more holistic manner to enable larger projects to develop and unlock funding. It would be useful if government funding supported regular CP meetings to develop skills, share best practice and help to foster a more collaborative approach to working across landscapes rather than simply catchments. (Forestry)</p> <p>The role of Ofwat is notably underrepresented, despite its critical influence on enabling water companies to invest in NBS through regulatory and funding frameworks. (Water Company).</p>
<b>Project governance</b>	<p>Land under NBS must also be put into a covenant to ensure that the NBS cannot be removed, either by any future landowner, developers or infrastructure projects. This is particularly important where NBS is funded through government grants to provide value for public money as well as ensuring the measures continue to provide environmental benefits into the future. (Forestry)</p>
<b>Climate emergency</b>	<p>Impact of climate change is horrendous and is being ignored to avoid panic but we must grow up and recognise risk and take action through mitigation and adaption while we can as we have a duty of care. DEFRA are now promoting adaption as well as the successfully failing net zero. The UK "Grenfell Towers" culture applies to NBS as no one is in charge except the communities who own the risk. (Community Volunteer)</p> <p>Those are major drivers for any private sector interest in MBS projects... climate change ... and starting to emerge as a biodiversity crisis and nature crisis, corporates would not be engaging with these projects. (National Parks)</p> <p>Finally, the framing of NBS should more clearly position them as vital tools for climate resilience, particularly in the face of increasing flood and drought risks (Water Company)</p>

## Additional Feedback: Multiple returns, voice & empowerment

There was additional feedback that the report could be strengthened by emphasising the potential for social, health and wellbeing outcomes, the need to empower communities and give nature a voice, and a stronger focus on urban NBS. There is evidence that these approaches work in some cases, and new projects should strive to achieve this. This included terminology including a focus on **natural capital**, **socio-Nature-based solutions** and the **Natural Health Service**.

<b>Natural Capital Multiple benefits</b>	<p>From a natural capital perspective is that there is often a multiple return on investment commitment. And that is a financial return – who pays, so this could be BNG or carbon or resilience to a water related stress – flood/drought/water quality, nature – biodiversity. Societal – how this impacts local people, for example access to green space or urban greening. And then an inspirational return in that the scaling factor overall of one intervention or one location helps to scale wider natural or nbs (NBS Charity)</p>
<b>Natural Health Service</b>	<p>Huge opportunity for community-based, upstream approaches to health to help deliver a healthier, wealthier, and happier population - should have included more evidence and potential for the <b>Natural Health</b></p>

	<p><b>Service.</b> This is something the Wildlife Trusts have undertaken quite a bit of work on - for example: <a href="#">Full economic assessment</a>; <a href="#">Summary report</a>; Plus Defra-led report <a href="#">Preventing and Tackling Mental Ill Health through Green Social Prescribing</a> (Wildlife Trust)</p> <p>There is potential of NFM for health both from direct (physical activity, social resilience) and indirect (flooding related ill health alleviation) benefits. E.g. links with innovative projects: such as <a href="#">NHS Green Therapy</a> and <a href="#">All Smiles for Nature and Health in the Humber Region – Natural England</a> (Natural England)</p>
<b>Socio nature-based solutions</b>	There are now emerging debates to extend nature base solutions to add social issues and people are calling this <b>socio nature based solutions (SNBS)</b> . (Urban NBS Academic)
<b>Giving nature a voice</b>	There is pioneering work around the legal personhood of nature multi species ethics et cetera especially in terms of river catchments and the rights of nature difficult to get into policy but this kind of stuff is happening and worth starting to introduce. People are also starting to give nature a seat at the table on boards: <a href="#">faith in nature report</a> (Urban NBS Academic)
<b>Community empowerment</b>	The language around community is a bit top down - i.e. "engagement " rather than the true potential of working with and empowering (Wildlife Trust)
<b>Urban NBS</b>	The report would benefit from greater emphasis on urban NBS applications like SuDS and green infrastructure (Water Company)