

# SKDC Climate Action Strategy

GLNP Comments 2023



Thank you for sharing South Kesteven District Council's draft Climate Action Strategy. Overall, it is a comprehensive strategy which positively identifies the Council's actions for addressing the challenges presented by climate change. I have included some comments relating to the role of the natural environment, for your consideration below. I am happy to discuss any of these further should you need.

## General comments

The GLNP understands that the primary focus of the Climate Action Strategy should be the reduction of carbon emissions over offsetting. However, the strategy could be more explicit on the value of nature recovery in terms carbon offsetting, climate change adaptation and the other multiple priorities it meets.

The document is a real opportunity to act as an exemplar by highlighting opportunities to meet the challenges presented by climate change by contributing to nature recovery. A number of the priorities identified throughout hold the potential for solutions to provide multiple benefits including for nature, whether this is through the implementation of green infrastructure or nature based solutions.

## Page 9

Due to their effectiveness the emphasis on trees and peat is important, however care should be taken not to suggest that enhancing other natural habitats isn't important in a climate change context. There is a risk that this could lead to the belief that planting woodland everywhere, even where it isn't ecologically appropriate, is justifiable for the sake of carbon offsetting.

The following wording could potentially address this, "altering the emphasis towards carbon storage and biomass production for fuel, accelerating **the creation, restoration and enhancement of natural habitats, especially through** tree planting and peatland restoration"

## Page 10

The value of the natural environment for climate change adaptation suggests that green infrastructure should be referenced in the third bullet point, especially as where green





infrastructure is used instead of traditional grey infrastructure the amounts of embedded carbon is reduced.

Potential wording could be “Adaptation to a changing climate is better embedded, infrastructure, **including green infrastructure**, is more prepared and resilient for extremes of weather”.

Also, the final bullet point on this page includes a spelling error and reads “**habits**” instead of “**habitats**”.

## Page 15

It would be nice to see some reference to the role of blended finance and the role of private investment when referring to funding. This could include encouraging businesses in the area to invest in nature based solutions as part of their corporate environmental responsibility.

## Page 18

Specific mention of green infrastructure and its role in meeting multiple objectives of sustainable development could be included here, for example sustainable urban drainage systems. There is also scope to highlight the benefits of green infrastructure over grey in terms of carbon offsetting and embodied carbon. The inclusion of green infrastructure also identifies nature as a co-benefit within the built environment.

Should there also be reference to biodiversity net gain and the role green infrastructure has to play in helping developments meet part of their targets onsite.

## Page 23

There is potential under the Power section to include reference to the natural environment. This could be both in terms of protecting it from the impacts of renewable energy installations, but also in respect of the opportunity these installations provide for the creation of more biodiverse landscapes. For example, the potential to create nature rich grassland around solar panels which can create a biodiversity uplift from farmland. A focus on this could give the section a co-benefit to nature.





## Page 24

Could the section “growing our green economy” include support for, or reference of, green investments such as water, biodiversity and carbon credit markets? This holds the potential for achieving nature recovery targets through private investment, while addressing climate change and the impacts of climate change, as well as ensuring nature is a co-beneficiary of this priority.

## Page 28

The GLNP supports the emphasis on nature recovery, however the “Natural Environment” section is also a great opportunity to highlight the value nature has for meeting objectives for climate change adaptation.

## Page 29

It should be clear that while tree planting can have benefits for both carbon storage and biodiversity, that creating woodland this is only this habitat type is appropriate. Not all species are adapted to a woodland environment and therefore in some cases planting could result in biodiversity loss. However, all habitats do capture carbon to different extents and it is a case of balancing the two priorities.

The chapter recognises the value of nature for offsetting emissions, but states that the Council won’t promote nature based carbon offsetting, beyond offsetting its own emissions. The GLNP understands that the council may want to put the emphasis on reducing emissions as this is a priority, however offsetting carbon through nature enhancement has the potential to drive the creation of habitats to adapt to the impacts of climate change and provide the other multiple benefits mentioned within the strategy. While the GLNP also understands that the Council may feel active promotion is not their role, the strategy could include a commitment to supporting such projects where appropriate.

## Page 30

It feels like the wording of the first paragraph frames peat soil habitats as the problem, in fact, due to their ability to sequester and store carbon indefinitely, when found in a natural state or managed to good condition, they are potentially a key part of the solution. While the emissions from peat soils should be recognised, the paragraph should be reworded to make it clear that this is due to historic and ongoing poor management. The paragraph should also be clear what “well managed” means, as the inclusion of their value for high





fertility and easy drainage might suggest that traditional farming techniques are how they should be managed, which is not the case. Instead such habitats require a high water level. The GLNP understands the importance of the agricultural sector and therefore how important it is that food production is not framed as the problem. Instead sustainable and regenerative farming methods should be promoted as part of the shift towards resilience for both the climate and the agricultural sector.

