

# Central Lincolnshire Policy S17 Carbon Sinks Evidence Report

Formerly Policy S16

March 2022



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## 1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S17, which relates to carbon sinks. Specifically, S17 seeks to protect existing carbon sinks, such as peat soils, and sets a presumption in favour of preservation in situ. It sets criteria that must be met in situations where a proposal would result in loss of or harm to an existing carbon sink.
- 1.3. The policy requires applicants to submit a proportionate evaluation of the impact of the proposal on the peat soil's carbon content and an appropriate soil management plan, or any other form of identified carbon sink.
- 1.4. The policy also sets out some considerations in relation to carbon sequestration.

## 2. Policy Context

### National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018, with subsequent additional changes being published in February 2019 and again in July 2021.
- 2.2. In relation to peat extraction, the NPPF states the following:

*“Planning policies should...provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction...”* (para 210)

*“When determining planning applications.... Minerals planning authorities should... not grant planning permission for peat extraction from new or extended sites...”* (para 211)
- 2.3. Furthermore, paragraph 152 of the NPPF requires that:

*“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”*
- 2.4. The NPPF does not set any further policy on relation to wider carbon sinks, nor in relation to carbon sequestration.
- 2.5. The Planning Practice Guidance (PPG) was first introduced in 2014 and offers ‘live’ government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.
- 2.6. At present, the PPG offers no guidance in relation to peat planning or extraction, other than paragraph 224 (Reference ID: 27-224-20141017) which relates to time extensions for

peat extractions from existing sites, and thus is not relevant to the Local Plan. It also contains nothing in relation to other carbon sinks, nor in relation to carbon sequestration.

### Local Policy

- 2.7. The current (2017) Local Plan sets no policy relating to peat management or extraction, carbon sinks, or carbon sequestration.

## 3. Context and Evidence

- 3.1. Consultants were appointed in July 2020 to investigate the scale of Central Lincolnshire's contribution to greenhouse gas emissions and climate change, and the opportunities that exist to tackle these problems locally, including through the Local Plan.
- 3.2. This work set out the overarching context for Central Lincolnshire identifying what would need to be done in order to achieve a carbon neutral Central Lincolnshire by 2050 (and 2041 to align to the science-based approach) to accord with the Paris Agreement. This research painted a very challenging picture to achieve these goals.
- 3.3. This work was broken down into a number of distinct tasks which combine together to provide a holistic picture for the area. Of particular relevance for Policy S17 were Task C Carbon Reduction Targets and the accompanying Policy Recommendations document; Task I The Potential Role of Offsetting; and Task L Peat Soil Mapping.
- 3.4. Task C, in summary, recommended / concluded:
- *Supporting land-based carbon sequestration and biodiversity.* (recommendation E.1.0)
  - *Developments over XX hectares will be required to demonstrate that the chosen site is not a significant carbon sink.* (recommendation E.1.1)
  - *Development on degraded peatlands will not be supported where those peatlands can be restored. New development on peatland sites will be required to demonstrate that there is no potential for the site to become a carbon sink.* (recommendation E.1.3)
  - *Our analysis shows that the land [peatland] plays a significant role in climate objectives – acting as both a source of greenhouse gas emissions, and a carbon sink. It can therefore be both a problem and a solution to climate change.*
  - *We will rely on land based carbon sequestration in addition to technological means for removing carbon from the atmosphere.*
  - *Preference should be given to development that does not build on sites that are ecologically or carbon significant, or have the potential to act as a significant carbon sink.*
- 3.5. Task I assessed the potential role of the Local Plan for offsetting, mainly as a planning mechanism for compliance with a Net Zero Carbon new buildings policy but also in its definition covering carbon removal projects (e.g. afforestation). It recommended an offset price along with key offset fund management principles, based on lessons learned from other carbon offset schemes in the UK. In summary, Task I concluded:
- *Reforestation, afforestation and peat restoration have limited potential in Central Lincolnshire and should be only used for 'hard to treat' sectors, not new buildings. It should not be funded from a planning offset contribution.*

- *The role of these carbon removals (e.g. reforestation, afforestation, peat restoration, carbon capture and storage) will therefore be limited and can only be able to offset all but the hardest greenhouse gas emissions to reduce (e.g. aviation, agriculture). The Local Plan should include a strategy for these carbon removal projects which recognises their role and how it will be achieved gradually.*

3.6. Task L, Peat Soil Mapping, highlights that “*in recent years, the importance of peat and peat soil as long-term carbon stores has been increasingly recognised internationally. The International Union for Conservation of Nature (IUCN) identifies that peatlands are the largest natural terrestrial carbon store, sequestering 0.37 giga tonnes of carbon dioxide per year and that damaged peatlands are a major source of greenhouse gas emissions (IUCN, 2017). As a result, countries are being encouraged to include peatland restoration as part of their commitments to global international agreements such as the Paris Agreement on climate change*”.

3.7. The study identified that in the Central Lincolnshire authority area, the existing peatland is all classed as fen peat, and mapped areas of existing peatland based on current soil and superficial geology mapping.

3.8. The task identified four main peat areas within the Lincolnshire Combined Authority area: one near Lincoln; one near Gainsborough; one near North Kelsey; and one near Sleaford. The total peatland coverage is nearly 3,900 ha, equivalent to 1.84% of the Lincolnshire Combined Authority land area. The four main areas of peatland cover an area just over 3,700 ha or 1.77% of the Lincolnshire Combined Authority land area.

3.9. Task L concluded with the following recommendations:

*“The small footprint area of mapped peatland and their long history of drainage and cultivation indicate that it would be disproportionate to produce a separate policy for peatland within the Local Plan.*

*Topsoils and carbon-rich soils including peatland have a very important role within the authority area and could form a key area for consideration within natural flood management policy or as part of a wider plan for soil improvement as a means to increase productivity and environmental enhancement.*

*Where possible and cost-effective, rewetting of suitable land areas should be considered as part of the overall response to greenhouse gas emissions. If undertaken sensitively, there would be a parallel benefit in terms of environmental enhancement and accessibility for members of the public.”*

3.10. Despite the recommendation not to include a separate peat policy in the Local Plan, policy S17 has been included as a wider ‘carbon sink’ policy, covering peat land and other carbon sinks, and also the matter of sequestration: its inclusion is in recognition of the significant impact upon carbon emissions these matters can have.

## 4. Issues and Options Consultation

4.1. The Issues and Options Consultation in 2019 did not include any specific question around peat extraction or management, carbon sinks, or carbon sequestration.

## 5. Regulation 18 Consultation

- 5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.2. Numerous responses were received in relation to the Carbon Sink policy. In summary, the response was mixed: there was support for the policy, but specific concerns raised in relation to the 'Carbon Sequestration' part of the policy relating to tree cover. It was highlighted that tree planting projects should consider the 'right trees in the right places' approach and that greater emphasis should be placed on the concept of 'Nature-Based Solutions'.
- 5.3. Emphasis was placed on the need to ensure tree planting or afforestation would not result in net carbon emissions; is in accordance with local nature recovery strategy; and is not at the expense of other habitats where other habitats may have biodiversity conservation priority.
- 5.4. It was queried whether the Local Plan will identify and map peatland.

## 6. Proposed Approach in Proposed Submission Local Plan

- 6.1. In light of the responses received during the consultation on the Draft Local Plan, various changes have been made to the policy, namely:
- 6.2.
  - The introductory text to the policy has been expanded, to provide more information and context for the policy;
  - The detailed wording of the policy has been amended:
    - To provide clarity;
    - To list examples of carbon sinks and reference Natural England guidance;
    - Reference to net increase or decrease in tree cover has been removed and replaced with favour for proposals where the net situation is a significant gain in nature-based carbon sequestration, and weighting against proposals that will cause harm to an existing nature based carbon sequestration process;
    - The inclusion of peat mapping has been considered: mapping will not be included in the Local Plan itself, but reference to the evidence base maps will be added.
- 6.3. The preferred policy approach taken forward in the Proposed Submission Local Plan is to have a policy setting a requirement for a proportionate evaluation of the impact of a proposal on peat soils/ carbon sinks (where development is proposed on land containing peat soils or other identified carbon sink), and setting out criteria that must be met in order for planning permission to be granted. The policy establishes a presumption in favour of preservation of peat and other carbon sinks in-situ. The policy also sets out various considerations in relation to wider carbon sequestration.

## 7. Reasonable Alternative Options

- 7.1. Two policy approaches were considered in relation to this policy: option 1 as outlined above, and option 2, to have no local policy and instead rely on national policy and guidance.
- 7.2. While the detailed policy wording presented in the Proposed Submission Draft Local Plan has been amended from that of the Draft Local Plan, the revised wording aligns with the overarching description and principle of 'policy option 1' (as originally presented in the sustainability appraisal) and therefore the same policy options were appraised at this stage as the previous. The scoring of policy option 1 has however been reviewed in light of the changes to the detailed policy wording.
- 7.3. The scoring of policy option 1 emerged the same as the previous assessment and therefore policy option 1 remains the preferred policy approach.
- 7.4. Policy option 2 was not progressed as the sustainability appraisal process revealed that this approach is likely to have potential for significant negative effects in relation to the pollution and climate change sustainability appraisal objectives, while the preferred policy approach had potential for positive or significant positive effects in relation to many objectives, with potential for adverse impact in relation to the water objective, though this impact is uncertain.

## 8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.