

Climate and Nature Emergency Plan

SEA Statement

The Environmental Assessment
(Scotland) Act 2005

Stirling Council
July 2021

Plan	Climate and Nature Emergency Plan
Responsible Authority	Stirling Council
Contact Address	sustainability@stirling.gov.uk
Date	2 July 2021

1. Introduction

This Strategic Environmental Assessment (SEA) Statement has been prepared by Stirling Council in accordance with Section 18(2)(b) and (3) of the Environmental Assessment (Scotland) Act 2005.

The main purpose of the Statement is to provide written evidence of how the SEA findings have been incorporated into the Climate and Nature Emergency Plan and to illustrate how the responses received during the public consultation exercise have been addressed.

The Statement further details how the environmental impacts associated with implementation of the Plan will be monitored. Full details of the assessment process can be found in the Plan Environmental Report, available on the Council Climate Emergency [web-page](#).

2. Overview of the SEA Process

Stirling Council, as a responsible authority, determined that the Climate and Nature Emergency (CaNE) Plan would be subject to SEA as it was likely to have significant effects on the environment.

The main components of an SEA comprise:

- An outline of the Plan, Programme or Strategy (PPS) to which the assessment is applied;
- A review of the relationship the Plan has with other relevant PPS and their main objectives;
- Obtaining baseline environmental information;
- Identifying existing environmental issues and problems;
- Identifying and assessing potential environmental impacts arising from the Plan;
- Identifying and assessing reasonable alternatives;
- Proposing mitigation measures to prevent, reduce or offset any adverse environmental impacts;
- Carrying out a public consultation on the Plan and associated Environmental Report;
- Incorporating consultation responses on the scope and findings of the Environmental Report; and
- Establishing measures to monitor the environmental effects of implementing the Plan, including ensuring any unforeseen impacts are identified and mitigated as necessary.

The Environmental Report and this SEA Statement provide a written, transparent and open account of the process.

The SEA of the Plan has to date included:

- Due consideration of the comments of the Consultation Authorities (HES, SEPA and SNH) on the Scoping Report;
- Preparation of an Environmental Report, which provided written comment on the assessment process;
- Consultation on the draft Plan and Environmental Report;
- Taking account of the findings of the Environmental Report and consultation responses before adoption of the Plan; and
- Provision of a commitment to monitor the significant environmental impacts of implementing the Plan.

3. Environmental Considerations

The core purpose of an SEA is to take account, during the decision-making process, of the likely significant environmental impacts of delivering a PPS. The Environmental Report details the likely environmental impacts that the PPS would have on the environment and a full assessment of those impacts can be found in the appendices of that Report. The SEA Statement outlines how the results of the assessment, as presented in the Environmental Report, have been used to inform the final, adopted CaNE Plan.

4. Consultation

Public consultation is an important part of the SEA process. Section 18(3) (c) of the Environmental Assessment (Scotland) Act 2005 requires that the public are given an 'early and effective' opportunity to participate in the process. Section 16 identifies the Environmental Report and the qualifying Plan to which it relates as the relevant documents on which to consult the Consultation Authorities and the wider public.

Consultation was carried out on the draft CaNE Plan and its Environmental Report between 9 March and 4 May 2021 on the Council's public engagement platform (<https://engage.stirling.gov.uk/en-GB/>) and via 3 public on-line sessions held on 8, 14 and 20th April 2021.

Written consultation comments and questions on the draft CaNE Plan were received from a total of 45 respondents made up of 36 identifiable individuals and 9 organisations / groups, including 2 of the 3 statutory Consultation Authorities. Anonymous comments were also received at each of the 3 on-line Live Events, but it was not possible to determine whether these were from one or more individuals.

Activity was spread across each of the different sections of the Plan, with the Transport theme generating the most responses and Climate Adaptation generating the least: the latter potentially reflecting less awareness and understanding of this important element of the climate emergency response.

Few comments were received on the SEA Environmental Report, and these were from only two of the 3 Consultation Authorities: Historic Environment Scotland and Nature Scot (due to a cyber-attack, SEPA was unable to comment on SEA consultations at the time).

The following tables detail the written comments and representations received on the CaNE Plan, the SEA Environmental Report, and the Council's responses to those comments.

Appendix A. Comments received on the Climate and Nature Emergency Plan Consultation (held between 9 March and 4 May 2021)

No.	Respondent	Summary of comments made	Stirling Council response and amendment
A1. General Comments			
A1.1	Steven Hampson (by email) 10 March	<p>Short of being a qualified expert on matters, what's not to like about the plan? Wide in scope and an integrated response to the Climate Emergency. However, the plan looks so different from current state and so different in attitude to what I currently see in Stirling Council that it's almost too ambitious for the council to deliver.</p> <p>It's easy to view this as a resident with an axe to grind on a couple of specifics, not as comments on the plan. Well it's both. Response to the Climate Emergency always comes down to specific actions either happening or not happening. I have found that in my case, in things that the council do on environmental matters that affect me, their actions are regressive and decidedly not enabling. This does relate to the plan, in as much as it can only succeed if a change in culture that genuinely prioritises the climate takes place in the council. My personal experience (what else should I judge something on?) is that it's very much business as usual and despite official recognition of the Climate Emergency, it's something far off in time and place that might just sort itself out. How can the plan work if current aspirations, and I'd argue obligations, are not being met? Thanks very much for getting this far!</p>	<p>The Plan needs to be ambitious to have any hope of delivering the changes the science indicates are necessary.</p> <p>The key is to maintain ambition and aspiration while bringing everyone along – including those not yet understanding the scale of the challenge.</p> <p>The draft Climate & Nature Emergency Plan is the latest step on that journey, with level of ambition under constant review to keep pushing targets and action further.</p>
A1.2	David Mitchell (by email) 23 March	<p>The initiative by the Council is to be welcomed. On reading the draft plan I noted some key omissions relating to standard approaches to this subject which would make for a more holistic plan, and a number of opportunities for Stirling Council to show more leadership in this area. I generally thought the targets could benefit from being more specific, ambitious and innovative.</p> <ul style="list-style-type: none"> • It is positive for Stirling Council to highlight what it will do as an organisation - it is perhaps a missed opportunity to identify that residents have a role to play too. • The document should recognise the innovative research work and practice in this field undertaken by various bodies in Stirling; SEPA, SNH, University of Stirling, Historic Environment Scotland. • Challenges will vary across the Council area - this needs to be recognised. • Tourism is a key economic activity for Stirling - sustainable tourism needs to be identified as a key objective with planning to support this. <p>Reasons for taking action Identifying cost cutting seems an odd take - some actions will cost more in economic terms - is it not about taking a more holistic view of 'cost'?</p>	<p>The need for all stakeholders, including residents, to take action is made throughout the document.</p> <p>These organisations are members of the Sustainable Stirling Partnership referred to on page 30 of the draft Plan and are partners the Council is working closely with to deliver draft Plan Objectives.</p> <p>Noted</p> <p>Visitors are referenced frequently in the text. Tourism as an economic activity will be picked up in the Regional Economic Strategy.</p> <p>This section highlights that the changes needed do not have to be seen as only negative but also offer positive opportunities. Not all action</p>

		<p>Nature - reasons for actions are more fundamental than 'stunning beauty'???</p> <p>Solid Actions / equitable transition Lead, enable and inspire are fine - should there not be something here about supporting grass roots activity - community driven mitigation and adaptation?</p> <p>Delivered by strong leadership and a decision making framework This section does not actually say anything tangible - what is the governance and accountability - is the protocol something to be adopted - how and by whom?</p>	<p>brings a cost – there are undoubted savings to be made in more than purely financial terms, such as improved health outcomes.</p> <p>The Council aims to 'Enable' and 'Inspire' community action through the policies, decisions and action it takes.</p> <p>This is an introductory section; Governance is developed further in the section on Key Enabling Actions, (pages 30 to 35). The Protocol was developed by the University of Stirling and will be applied to all activity.</p>
A1.3	Anonymous (Live Event) 8 April	<p>Thanks for the presentation. There are many good proposals but the plan lacks on detail regarding when the 'key actions' are expected to be implemented. Other local authorities have provided more detailed plans including for example mentions to working partnerships for some of the actions, as well as more clear timelines and also if potential funding is available. Would it be possible to add these sorts of details to the Stirling plan, please?</p>	<p><i>Answer provided during the Live Event:</i> The draft Plan is a strategic document with high level Objectives, priorities and key targets to guide Council and partner action: there will be more detail in the thematic Plans and strategies under development. In the meantime, the consultation asks local people if these are the correct priorities, targets and actions. How might these be improved? What do you think is missing? Please submit your suggestions on the Engage Stirling platform or to the sustainability@stirling.gov.uk email address</p>
A1.4	Anonymous (Live Event) 8 April	<p>Thanks for the presentation. Considering that this is an 'Emergency' plan, would it be possible to highlight some of the proposals that are expected to be completed this year? Thanks. The Action Planning table towards the end of the document shows only more plans to be developed with no specific actions been taken. It is disappointing to see this as many other local councils have published Climate Emergency Plans with clear actions points....</p>	<p><i>Answer provided during the Live Event:</i> The target boxes for each objective highlight some of the proposals that will be completed over the next year, as does the Action Planning table towards the end of the document. <i>Post consultation period:</i> New pages 36 and 37 introduced to highlight actions currently taking place as supporting documents are developed.</p>
A1.5	Anonymous (Live Event) 8 April	<p>Have the United Nations Sustainable Development Goals been considered when developing the plan?</p>	<p><i>Answer provided during the Live Event:</i> A huge amount of information has been considered in development of the draft Plan but we've tried to keep the document itself brief for readers. You'll see a link provided to the SDGs and other key background information on the Engage Stirling platform.</p>
A1.6	Anonymous (Live Event) 8 April	<p>Would the Council consider to do more to decouple growth (GDP) with being the main measure of success, for example measurement of success associated with health and well-being, biodiversity, air quality etc. should have more weight. Take leadership over other councils and even the government. For example should the green field site be granted permission for retail just because it brings jobs/retail space business rates because we measure GDP, if we measured by health, biodiversity etc we would more likely consider alternative development such as accessible green space, outdoor gyms, outdoor enclosed dog parks, etc learning from pandemic and truer green recovery</p>	<p>Stirling Council uses a number of indicators to measure performance and reports on these to the appropriate committee. These indicators cover all areas of the Council's remit.</p> <p>GDP is used as a measure at the national level, though the Council may quote it where thought useful. A number of organisations are now considering alternative, more informative measures and the Council will participate in discussions and their use, where appropriate.</p>
A1.7	Anonymous (Live Event) 8 April	<p>Council could run a new action to take each month for residents that support your proposals to help them feel like they change. Waste minimisation month, waste recycling month, leave car at home month, plant up month, no mowing month etc- opportunity for residence to log what they have done and celebrate</p>	<p>The Council already promotes or takes part in a number of awareness initiatives and campaigns, including Car Free Day, Bike Week, Clean Air Day, Zero Waste Scotland's 'Pass it on Week', and WWF's Earth Hour. There is a balance to be struck between investing limited officer time participating in campaigns and delivering practical projects.</p>

A1.8	Emma (Live Event) 8 April	Will these questions be fed into the consultation by you or do we have submit a response too?	As stated during the presentation, and on the Engage Stirling platform, all comments received during the consultation will be pulled together and responded to in this report.
A1.9	Rachel Nunn (by email) 12 April	<p>My overall view with regard to Stirling's Climate and Nature Emergency draft plan is that it provides insufficient detail or description of actions for each area of emission for me to be able to even start to comment on whether the council is doing the right things, or doing enough. The plan – whilst maintaining the Scot Gov targets – does not drill down into the activities, many of them no and low regrets activities, that I would have expected to see outlined (by now) in order to achieve these targets. Nothing has been described using SMART targets, which to me would seem an essential component for a successful strategy. The lack of specifics – some of which I outline below – leads me to feel very concerned that Stirling council has yet to wrap its head around the scale & complexity of what needs to be done. All told this largely feels to me to be a strategy that says it will achieve its targets by hoping that other corporate strategies take it into account. In short, I feel it has fallen well short of the remit that it's name would suggest, and disappointingly behind providing specific actions & detail that is certainly in the public domain, as 'stuff' councils need to be getting on with. If Stirling Council believes there is a climate emergency and if it is committed to fully playing its part to help Scotland meet its mandatory CO2 reduction targets, then serious questions need to be asked about the capacity and skills within this team delivering this objective on all our behalf.</p>	<p>The draft Plan is a strategic document with high level objectives, priorities and key targets to guide Council and partner action: there will be more detail in the thematic Plans and strategies under development.</p> <p>While these thematic Plans are being developed, the Council and partners are pushing ahead with practical projects which support CaNE Plan objectives and targets, with the main ones listed in new pages 36 and 37.</p> <p>In the meantime, the consultation asked local people if the Plan incorporates the correct vision, objectives, priorities, targets and actions in order to steer the Council, partners and residents to make better choices to tackle the Emergency.</p>
A1.10	Name provided (by email) 13 April	<p>It would be very helpful to quantify the expected impacts of actions to show how they will meet overall aims.</p> <p>While the individual actions highlighted will all have positive impacts, there is a marked lack of quantification of impacts. It's great to see the Council committing to its share of the 75% Scottish Government cut in emissions by 2030, and the associated recognition that in practice this means a reduction of around 50% of emissions from Stirling residents and businesses over the next decade.</p> <p>Recognising the climate emergency was an essential first step which showed leadership. It is much less clear how this challenge will be met in practice though, as set out in the plan.</p> <p>Given a ten year horizon and accepting there will inevitably be resource constraints, it's critical that the Council focuses on the areas where greatest benefit can be achieved most cost effectively. It would therefore be helpful for the plan to set out how the individual actions proposed will contribute to delivery of the necessary emissions savings for each of the main areas of emissions identified in the plan. Understanding quantified impacts by sector – even roughly - seems to me essential to deliver this.</p> <p>The route map diagram on p36 could usefully be brought closer to the front of the document and have indicative carbon savings attached to it to illustrate this.</p>	<p>Noted. Using data provided by Department of Business, Energy and Industrial Strategy – a summary of which is included in the Council's statutory annual Public Bodies' Duties reporting - this will be picked up by activity under the 'Data and clear information' heading on page 32.</p>

	<p>Secondly, it would also be helpful to place the Council's proposals in the wider context, as progress on reducing emissions in all sectors in Stirling will depend to a greater or lesser extent on actions being taken at Scottish or UK levels.</p> <p>Broadly, data show that there has been very substantial progress in decarbonisation of electricity generation at the level of the GB grid, but that there has been more limited net reduction of emissions from other important areas, particularly heating and transport. This is entirely consistent with the chart provided on p9.</p> <p>Key questions for Stirling following from this might be:</p> <p>What actions are being taken at higher level?</p> <ul style="list-style-type: none">- Do Stirling Council and partners need to do anything to reinforce and add value to these actions?- If so, what might be the most effective responses? <p>As an example:</p> <p>There is now a ban on the sale of new pure fossil fuel cars from 2030, and there is already evidence of increasing sales of electric vehicles.</p> <p>Stirling Council has already taken welcome steps to providing charging points. However, many more charging points will be needed to ensure potential EV owners are confident they will be able to charge when they need to do so, and particularly to ensure that charging facilities are available for residents without access to home chargers.</p> <p>It would not be appropriate for this plan to detail the location or type of chargers required – but I would expect that the plan would model likely take up of EVs, the associated need for charging points and that there would be a commitment to increasing the density of the charging network in line with demand.</p> <p>I'd also suggest that the Council should stop providing free electricity at its charging points, as some others have done. Rather, available funds should be targeted towards expansion of the network. Free charging will not in any case be a sustainable practice in financial terms as EV ownership grows, but in addition:</p> <ul style="list-style-type: none">- Electricity generation generally exceeds demand overnight, and prices and carbon are lower as a result. In the absence of free charging, more users would charge at home, making better use of existing capacity; and- Related, if payment was required, chargers would be used by those who needed them on longer journeys, rather than by those using them for financial reasons.	<p>Agreed</p> <p>Noted</p> <p>The Council has undertaken work to model low, medium, high uptake of EV scenarios, taking into account residential areas where access to off street charging is limited. This has been used in discussions with the network operators (Scottish Power & SSE) regarding the need to expand the capacity of the grid in certain areas.</p> <p>An EV Charging Infrastructure Policy has been drafted and recommends the introduction of a tariff for use of charge points. The proposed tariffs are set at rates estimated to incentivise drivers to charge at home - rather than the public network - yet still remain attractive to those with no means of home charging. The Policy will be presented to full Council for approval in 2021.</p>
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	<p>A similar approach could usefully be taken in relation to the promotion of energy efficiency in housing:</p> <p>The Scottish and UK Governments provide a range of support mechanisms available to individual homeowners, which cover both insulation and subsidies for low carbon heating, and there is increasing discussion about the need for regulation to drive up energy efficiency standards.</p> <p>However, the blend of technologies best suited to an individual home is not always clear, especially for those in rural Stirlingshire without access to mains gas and / or which require non-standard approaches to insulation.</p> <p>The Council has clearly made significant progress in upgrading its own housing stock. As noted briefly in the plan, an appropriate response now could be to provide advice to homeowners in Stirling on how they could take action, and help them identify any appropriate support.</p> <p>Thirdly, it would be helpful for the plan to describe partnership and governance arrangements in more detail.</p> <p>The plan is absolutely correct to highlight both the importance of the Council leading by example, but also the very small proportion of total Stirling emissions which can be affected by changes to the Council's practices in this way.</p> <p>I completely agree that a balance is needed: the Council needs to be seen to lead by example, but also not to concentrate actions internally where those are increasingly expensive per tonne of carbon saved. To demonstrate this, it would be helpful for the plan to detail what actions all departments of the Council are taking, and also any existing approaches and systems are being changed. The people side is critical in this; like any culture change, a network of champions at all levels from senior management down, together with dedicated experts on whom they can call for technical assistance, will be needed. Experience suggests that targets need to be broken down to each part of the Council, to ensure there is wide and fairly distributed commitment; if delivery of each individual theme is allocated to an individual officer, there is a high risk that others will see change as being the job of that officer alone.</p> <p>Political agreement and consistency is also critical. While there is agreement across the political spectrum that climate change is one of the defining challenges of our time, there is obviously room for debate on the most effective solutions. I would very much welcome a cross-party approach on the final plan, to at least reduce the risk its delivery will not be derailed by any future changes of administration.</p> <p>In parallel, to make progress of the magnitude required, it follows that the Council should concentrate most effort on using its influence to encourage and enable change in the actions taken by others. It is,</p>	<p>The Regional Energy Masterplan will be implemented on a 'fabric first' basis. This will be broken down into area-based schemes to ensure solutions are tailored to local needs. We will follow the energy hierarchy whereby the first step is to reduce energy demand; then improve energy efficiency; sustainable renewable energy production; low carbon generation; and sources of last resort, which are offset through carbon capture/sequestration. We work with public partners, including Home Energy Scotland (www.homeenergyscotland.org) who offer free, impartial advice on energy saving and renewable energy solutions (as well as other areas such as greener travel) in order to help people in Scotland create warmer homes, reduce energy bills and help tackle climate change.</p> <p>Noted</p> <p>This will be developed in the net-zero plan outlined as a Key Action in the Energy Use and Generation objective at the top of page 17.</p> <p>A cross-party Member-Officer Working Group was involved in steering development of the consultation Plan. That group agreed unanimously that continued engagement with an Elected Member group was essential to oversee implementation of the Plan, projects and supporting documents.</p> <p>The Council is already engaging with partners, including Forest & Land Scotland, Green Action Trust and landowner representative organisations, to discuss the changes that we need to make to our land</p>
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A1.11	Name provided (by email) 13 April	<p>Stirling Council Progress</p> <p>The chart on p10 on the Council's own emissions would benefit from further interpretation. Scope 2 emissions are driven by electricity use, and it seems likely that the (welcome) sharp fall in that part of the chart is simply due to wider changes in the decarbonisation of the electricity grid. It would be helpful to clarify if this is indeed the case.</p>	<p>More detail and interpretation is provided in the Council's annual Sustainable Stirling Report, submitted to Scottish Government as a requirement of the Climate Change (Scotland) Act 2009: https://www.stirling.gov.uk/planning-building-the-environment/sustainable-development/what-we-are-doing/</p>
A1.12	Anonymous (Live Event) 14 April	<p>As well as this presentation, are there going to be other events or workshops where wider sections of the population are engaged and more open conversations are possible?</p>	<p><i>Answer provided during the Live Event:</i></p> <p>The Council was developing a public engagement programme in 2020 when the coronavirus pandemic hit and established the Engage Stirling platform as an alternative means of engagement. The section on Key Enabling Actions (from page 30) outlines further engagement activity as we develop supporting documents for the Plan's 5 main themes.</p>
A1.13	GWH (Live Event) 14 April	<p>Will these slides be available?</p>	<p><i>Answer provided during the Live Event:</i></p> <p>The slides replicate the contents of the draft Plan so you can see the same content on the Engage Stirling platform.</p> <p><i>Post-event:</i> Slides are available on the platform and Council web-site.</p>
A1.14	Ana (Live Event) 14 April	<p>Will next week appointment be a similar presentation?</p> <p>So the same presentation?</p>	<p><i>Answers provided during the Live Event:</i></p> <p>Yes, the session on 20 April will follow the same format.</p> <p>Correct – the presentation is on the contents of the Council's draft Climate and Nature Emergency Plan. The consultation asks local people if the Plan contains the right priorities, targets and actions. How might these be improved? What do you think is missing? Please submit your suggestions on the Engage Stirling platform or via the sustainability@stirling.gov.uk email address.</p>
A1.15	Naomi Ross (by email, following 2 nd Live Event) 14 April	<p>Overall, very supportive of everything the council is aiming to do in this area, it's clear it's an issue being taken seriously. There was a lot of talk about how Stirling's ambitions/work to date compares with other councils. Whilst I understand this is important to the council, as a resident, my only interest is in how these things compare with the recommendations set out in the IPCC report - i.e. are the targets in line with what's needed to stay well below 2 degrees warming; do the priority actions match with what's recommended in the report?</p> <p>A reminder also that the IPCC report is considered by many to be something of a "best case scenario" and that we really need to be doing everything we can to push beyond what's recommended in there, particularly as every fractional degree of warming/biodiversity loss ultimately represents lives lost to climate change. So any of the</p>	<p>Noted. Using data provided by Department of Business, Energy and Industrial Strategy – a summary of which is included in the Council's statutory annual Public Bodies' Duties reporting - this will be picked up by activity under the 'Data and clear information' heading on page 32.</p> <p>The graph on page 9 (area-wide emissions) includes a projection using analysis by the Tyndall Centre for Climate Change Research, which takes the emissions reductions required by the UK Government to meet Paris Agreement targets and extrapolates these to the Stirling Council area (dotted red line).</p> <p>The IPCC report includes a number of scenarios: the one most-frequently referred to is the one which projects the middle route between best-case (i.e. maximum emissions reduction) and worst-case</p>

		<p>targets/actions that don't at least match their recommendations I think need to be revised.</p> <p>We need to be thinking about not what's achievable but what must be achieved and working backwards from there (Man on the Moon levels of ambition please!)</p> <p>I'm really pleased to see such an emphasis placed not just on reducing our environmental impact, but also on regenerative actions being taken, such as the focus on tree planting and restoring our pollinator populations. The more that can be done in these areas the better, thank you.</p> <p>I would have liked to have heard more about sustainable food production and how the council plans to help drive this forward.</p> <p>I would also like to have heard more about how the council will use its planning department to help prioritise support for sustainable businesses over business-as-usual ones, particularly given the clear need for a rethink of what our town centres are going to look like ppost-COVID. More on this would be welcomed please, with consideration given as to how to differentiate between businesses who genuinely have sustainability and social benefit at their core and those who include it as an add on to their core business, simply to satisfy CSR targets or convince customers they're trying.</p> <p>Overall - really great start, my ultimate ask would be more, faster please!</p>	<p>(i.e. little emissions reduction). The early evidence on measured global emissions indicates they are higher than this middle route scenario.</p> <p>Agreed</p> <p>Noted</p> <p>New Priority R05 introduced for the Resource Efficiency objective on page 21: <i>Support development of a sustainable local food economy and minimise the impacts of food choices.</i></p> <p>One of the Plan's Key Actions (page 23) is <i>to develop a Sustainable Food Plan to increase access to local, affordable healthy food, promote a vibrant sustainable food economy, and reduce the ecological footprint of our food system from Stirling farmers to residents' plates.</i></p> <p>The Planning (Scotland) Act 2019 sets out a statutory definition for the purpose of planning, i.e. manage the development and use of land in the long-term public interest. This includes anything that contributes to sustainable development. Decisions on planning applications and the preparation of the forthcoming replacement Local Development Plan therefore primarily focus on the planning and environmental impacts, both positive and negative, of new development, whatever its scale, nature and location, however cannot take into account the sustainability and corporate social responsibility credentials of any particular developer. A wide range of business support services have been introduced which promote the benefits of sustainability.</p>
A1.16	Catriona Conroy (Live Event) 20 April	<p>You state that you want to "Inspire" businesses to help locally with the climate emergency. How do you plan to inspire the company that has now got permission to quarry at Gillies Hill in Cambusbarron? That is not as you state, "protecting and restoring nature" allowing that to go ahead is going to do the complete opposite, not just in the said area but surrounding areas. Have you had conversations with the company/business to deter them from going ahead?</p>	<p>This relates to a recent planning application to create a new access track into Murrayshall Quarry on Gillies Hill which was refused by the planning authority at the planning committee. The appellant obtained planning permission via an appeal to the Scottish Government Planning & Environmental Appeals Decision: https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=121261</p> <p>Planning permission has been in place to quarry at Murrayshall for decades and recently the operator of the eastern section of the quarry obtained planning permission, via the appeal, to access that section of the quarry. It is likely that this permission will be implemented by Patersons Quarries Ltd.</p> <p>Having already taken a decision to refuse the planning application for an access track, the planning authority is not in a position to resist / deter Patersons Quarries Ltd implementing their permission.</p>
A1.17	'Out in the sticks' (Live Event) 20 April	<p>Will you be permitting more small businesses to get suitable buildings through planning so that local people can work locally?</p>	<p>Emerging national planning policy and guidance, e.g. Scotland's Fourth National Planning Framework Position Statement (November 2020), is exploring significant changes to policies on rural and island development, to support prosperous and sustainable communities and businesses whilst protecting unique natural assets.</p>

			The finalised policies will then form part of the development plan of Stirling. The preparation of the forthcoming replacement LDP will also take full account of these changes. Its' spatial strategy, being a detailed statement of local policies and proposals as to the development and use of the land, will take account of the need to identify employment land or provide for the change of use of existing buildings to further support the development of local rural businesses.
A1.18	<p>Resilience and Sustainability Partnership Stirling (RASPS) (by email) 30 April</p> <p>Group includes: Creative Stirling, Extinction Rebellion Stirling, Fallin Community Enterprises t/a Recyke-a-bike, Forth Environment Link, Global Justice Stirling, On the Verge, Stirlingshire Voluntary Enterprise, The Kitchen at 44, CIC, The Surefoot Effect, CIC, Transition Stirling.</p>	<p>2. Key Recommendations</p> <p>2.1. Stirling Council commits to go 'further and faster' by setting an ambitious target for achieving Net Zero as soon as possible.</p> <p>2.2. Stirling Council recognises the critical role of third sector organisations and communities in achieving climate sustainability.</p> <p>2.3. Stirling Council recognises the diverse leadership and governance needed to tackle the climate emergency.</p> <p>2.4. Stirling Council allocates specific resources against the Climate and Nature Emergency Plan.</p> <p>4. Stirling Council recognises the critical role of third sector organisations and communities in achieving climate sustainability.</p> <p>4.1. The Plan clearly, and correctly references the critical role of businesses in tackling action on climate change, however we note with disappointment the limited mention of the critical role of the third sector as key agents for change in climate action.</p> <p>4.2. The third sector- which includes charities, social enterprises, and voluntary groups is civil society in action. The third sector already plan a critical role in organising community- led action to tackle climate change. RASPS asks that the third sector be given the respect they deserve and are embedded throughout the plan where there is mention of business and the public sector.</p> <p>4.3. The Climate and Nature Emergency Plan states that all objectives will include actions designed to Lead, Enable and Inspire. While actions aligned with these values are positive, RASPS would like the plan to acknowledge that the Council has a role to also listen, support and collaborate. Third Sector organisations and communities are often at the cutting edge of innovative projects designed to tackle climate change. By embedding these values, alongside Lead, Enable and Inspire, Stirling Council would be recognising the role that communities have in identifying the solutions to the problems rather than solutions being fostered upon them by public authorities.</p>	<p>End point targets can be a useful indicator of ambition but it is the total amount of CO₂ released on the way to the target that is most important for achieving climate change goals - deeper cuts made sooner by all of us will have the greatest impact.</p> <p>Noted</p> <p>Plan updated to refer to the third sector more frequently, where appropriate.</p> <p>Plan updated to refer to the third sector more frequently, where appropriate.</p> <p>Noted</p>
A1.19	<p>Forth Environment Link (FEL) by email 3 May</p>	<p>General observation: FEL broadly welcomes the Council's Plan.</p> <p>FEL also supports and has contributed to the consultation response submitted by SVE on behalf of the Resilience and Sustainability</p>	<p>Noted</p> <p>Noted</p>

	<p>Partnership, which reflects the wider comments from the third sector on the plan.</p> <p>FEL considers the targets could be more ambitious and the Council could go further, faster in terms of climate action. By setting ambitious targets, there is a greater likelihood of achieving net zero by 2045.</p> <p>FEL would like to see a section on green growth – skills; innovation; business/third sector support.</p> <p>FEL would like priority actions to be clearly identifiable throughout the plan.</p> <p>One glaring omission in the Plan is the impact Covid is and will have on our recovery, our economy, our society and our environment. The next normal is going to be different. It will not mean going back to the conditions that prevailed in 2019. For one thing, the massive acceleration in the use of technology, digitisation, and new forms of working is likely going to be sustained. To develop a plan to tackle the climate emergency without reframing that in the Covid world we live in now is, we feel, flawed. The absence of this dates the Plan before it has even been published.</p> <p>It would appear there is no clear investment strategy underpinning the plan. If the 5 year master plan is the indicative framework for investment, we would want to see a chapter on funding and investment – being transparent about where the money will come from and where the gaps might be.</p> <p>The role of the third sector and the impact the sector has, is and will make on climate action is under represented. If the Council's footprint only represents 2% of the area's total emissions, civic society represents a huge opportunity for climate action and reduction, through engaging and supporting communities and the third sector.</p> <p>Neighbourhood/community planning and local action for change is missing from the document e.g. there would be an opportunity to raise the ambition around the number of Stirling communities becoming 20 minute neighbourhoods/rethinking local communities.</p> <p>The food system is missing from the document. Climate change is affecting our food system. Covid has highlighted the systemic failures in our global supply chains and the need to have resilient local food</p>	<p>End point targets can be a useful indicator of ambition but it is the total amount of CO₂ released on the way to the target that is most important for achieving climate change goals. This is because end point targets can be met with different amounts of total CO₂ emissions, depending on the reduction pathway followed. So yes, deeper cuts made sooner by all of us will have the greatest impact.</p> <p>Skills, jobs, innovation and the green economy are referenced throughout the document, but with particular focus in the Key Enabling Actions section.</p> <p>Priorities and Key Actions are highlighted for each of the 5 main objectives.</p> <p>The impact of Covid and the opportunity to build back better is outlined in the Foreword by the Council Leader, Scott Farmer, and the introductory section on 'Why we need to take action' on page 4.</p> <p>Agreed.</p> <p>The Plan takes the position we're currently in and proceeds from there.</p> <p>The Finance and Funding page in the Key Enabling Actions section outlines the main issues and approach, while Plans developed under each of the themed objectives will contain further detail. Government announcements for new initiatives (legislation, regulation and finance), the costs of new technology, and development of new innovations are changing frequently. In addition to very welcome external finance, many of the required changes will need to be made within existing resources by changing the way all organisations and individuals operate, using a flexible, dynamic approach.</p> <p>Plan text has been modified to include more references to the 3rd sector.</p> <p>While direct emissions from Council activity are only about 2% of area-wide emissions, Council policies and plans have a much wider impact in guiding infrastructure developments through Planning and transport, for example. Having supportive Scottish and UK Government legislation, regulation and funding in place will have an even greater impact, making it easier for civic society, communities and individuals to make low-carbon, environmentally-friendly choices as they go about their lives.</p> <p>One of the Key Actions to deliver Objective 3, states: <i>We will develop a Sustainable Food Plan to increase access to local, affordable healthy food, promote a vibrant sustainable food economy, and reduce the</i></p>
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A1.20	<p>Historic Environment Scotland (via SEA Gateway) 4 May</p>	<p>The global climate emergency has created a pressing requirement for the maintenance, re-use and adaptation of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent.</p>	<p>Noted</p>
A1.21	<p>University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May</p>	<ul style="list-style-type: none"> • Broadly covers the urgent changes needed and moves away from a “business as usual model” but lacks detail regarding the actual mechanisms of achieving the vision and aims. For example, emphasis is put on local people and business to “make changes” yet there is no mention of resources being made available to enable these changes (only “working with Scottish Government” is stated, which is vague). Funding needs to made available in order to make changes inclusive. More detail on what changes are expected of individuals and businesses would be good, as it is very vague at the moment • It would be great if it was explicitly stated that the vision, aims and actions are going to be evidence-informed. 	<p>The draft Plan is a strategic document with high level objectives, priorities and key targets to guide Council and partner action: there will be more detail in the thematic Plans and strategies under development. The consultation asked local people if the Plan incorporates the correct vision, objectives, priorities, targets and actions in order to steer the Council, partners and residents to make better choices to tackle the Emergency.</p> <p>Key Enabling Action 3 on p 32 highlights work on data and metrics.</p>

		<ul style="list-style-type: none"> • Clarity is needed on what exactly will be communicated to the public and local businesses, and the approach taken to communicate should be based on evidence because modes of communication will affect public perception of actions and will impact buy-in of the local community and businesses. • Some indication of whether the key actions are short-, medium- or long-term actions is needed so ambition, priorities and expectations are clearer. • There are clear linkages between some of the objectives i.e. energy generation/electrification of transport system/access to green space - some overview of how these objectives will be achieved, taking a joined up, whole systems approach would strengthen the plan. 	<p>Noted</p> <p>Detailed Action Plans will be developed for the Plans and Strategies to be developed under each of the themed objectives.</p> <p>Noted</p>
<p>A1.22</p>	<p>Transition Stirling membership (by email and Engage Stirling platform) 4 May</p>	<p>Detail In general there are a lot of “we will”s, but not enough information on how these will be achieved. We appreciate that the Council might not know how at this stage but in some areas projections are for things to be carried out by 2022 or 2025 so it would need to be outlined how these things at least will be achieved by then. If it is preferred that the plan itself is concise, more detail could be added as appendices as done by other local authorities in their plans. Details about partnerships and collaborations with other organisations would also be important to highlight.</p> <p>There could be more information on the costings of actions and more about how that money will be raised. A long-term strategy to finance net zero should be developed, in collaboration with the third sector and other agencies. Savings realised through the implementation of the plan should be ring- fenced and reinvested into supporting further progress towards net zero. Transparency in the total budget required to finance the plan, and current budget allocations, will support multi-agency working and identify how shortfall can be financed.</p> <p>While we appreciate that the plan should be concise, a lot of other plans were mentioned with no links to further information. For some of these plans it was unclear if it had already been written or not. Footnotes and links in the document to the other plans would be better.</p> <p>Engagement We do not feel that there has been enough effective engagement. We understand the difficulties involved in engaging people throughout a pandemic other than doing it purely online. However, we feel that a citizens’ jury would have been an effective way to engage a good cross-section of people, rather than only those with the inclination to complete an online survey on climate change. If this were set up now the jury could feed into the other plans and give feedback on progress as the plan moves forward.</p>	<p>Detailed Action Plans will be developed for the Plans and Strategies to be developed under each of the themed objectives.</p> <p>The Finance and Funding page in the Key Enabling Actions section outlines the main issues and approach, while Plans developed under each of the themed objectives will contain further detail. Government announcements for new initiatives (legislation, regulation and finance), the costs of new technology, and development of new innovations are changing frequently. In addition to very welcome external finance, many of the required changes will need to be made within existing resources by changing the way all organisations and individuals operate, using a flexible, dynamic approach.</p> <p>The Plan is a high-level, strategic document intended to indicate direction of travel and, as such, needs to influence a number of other documents. Some of these documents are under development while others need updating to incorporate Emergency considerations</p> <p>The draft Plan refers to a number of engagement opportunities, which will evolve as the Council’s response develops and matures. A Citizen’s Jury, Panel, or Climate Assembly are all good examples of community engagement and we can all learn from their experiences.</p>

		<p>As a third sector organisation, specifically working on climate change for 11 years in Stirling, we are disappointed that this is the first time we have been able to feed into the plan, after it was written, by sending this email. We feel there should have been considerably more effort to involve local third sector organisations. We are really keen to be involved more moving forward.</p> <p>“Inspire” didn’t feel like enough to us. It seems like something being done to the community rather than a process of working together.</p> <p>“Engage and inspire” would be better to us with information about how the community would continue to be engaged in the decisions in the plan throughout, not just through a survey at the beginning. It feels like the community are only being spoken to and not listened to with presentations leaving virtually no time for questions, feedback or any actual dialogue at all.</p> <p>There should have been more information about how each action would benefit the community. This would help people see the benefits of actions in the plan for themselves and their communities and help them to get on board and support the plan.</p> <p>Awareness</p> <p>In many other crises, people have acted because government has told them to and made clear the urgency of the situation. For example, right now we have nationwide adverts reminding us of the sacrifices or precautions we need to be taking to tackle Coronavirus. During the War, the same thing contributed to citizens taking up urban farming, accepting rations, turning their lights off etc. Whilst the council can’t run national campaigns, it would be good to see locally delivered ones of this nature for climate change, for example on local radio, local magazines, advertising space in streets. For a citizen who doesn’t consider climate change to be a big deal, they are more likely to respond when the council tells them it’s important than they are when a "green" organisation with "agendas" does.</p> <p>Business</p> <p>We would also like to have heard more about how the council will use its planning department to help prioritise support for sustainable businesses over business-as-usual ones, particularly given the clear need for a rethink of what our town centres are going to look like post-Covid. More on this would be welcomed, with consideration given as to how to differentiate between businesses who genuinely have sustainability and social benefit at their core and those who include it as an add-on to their core business, simply to satisfy CSR targets or convince customers they’re trying.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Research frequently indicates that the public have greater trust in environmental organisations than in government, depending on the circumstances. The challenges of the Climate & Nature Emergency are so great, however, that this information needs to be integrated into messaging from all sources: from all levels of government and the wider public sector, to industry, commerce, the 3rd sector and other organisations, and through all film and media outlets.</p> <p>The Planning (Scotland) Act 2019 sets out a statutory definition for the purpose of planning, i.e. manage the development and use of land in the long term public interest. This includes anything that contributes to sustainable development. Decisions on planning application and the preparation of the forthcoming replacement LDP therefore primarily focus on the planning and environmental impacts, both positive and negative, of new development, whatever its scale, nature and location, however cannot take into account the sustainability and corporate social responsibility credentials of any particular developer.</p> <p>A wide range of business support services have been introduced which promote the benefits of sustainability.</p>
A2. Plan Vision			
A2.1	Pat Morrissey (Engage Stirling platform)	This is a wonderfully aspirational vision. It remains to be seen how it will be put into practice.	These comments relate to a recent planning application to create a new access track into Murrayshall Quarry on Gillies Hill which was refused by the planning authority at the Planning Committee. The appellant

	18 March	However, given that planning permission has been given for work to begin at the quarry in Cambusbarron, anything the council says about nature and biodiversity is suspect.	obtained planning permission via an appeal to the Scottish Government Planning & Environmental Appeals Decision: https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=121261
A2.2	Crawford Logan (In response to Pat Morrissey above) (Engage Stirling platform) 13 April	This is just to add another name to agree strongly with this and other comments regarding Murrayshall Quarry. It is of course finally the Scottish Reporter who has given (pretty much) the green light for this disgraceful development, but I would still like to see the Council continue to defy this by any means possible. I cannot see how it can come close to meeting local and national commitments to reducing carbon. And all this in the year Scotland hosts COP26 when we could set an example to the rest of the globe by saying no, this is now unacceptable. Also we urgently need to change a planning system which is grossly skewed in favour of predatory developers.	Planning permission has been in place to quarry at Murrayshall for decades and recently the operator of the eastern section of the quarry obtained planning permission, via the appeal, to access that section of the quarry. It is likely that this permission will be implemented by Patersons Quarries Ltd. Having already taken a decision to refuse the planning application for an access track, the planning authority is not in a position to resist/deter Patersons Quarries Ltd implementing their permission.
A2.3	Dennis Oetinger (Engage Stirling platform) 20 March	A great vision indeed but highly questionable with the plan to open up the Cambusbarron quarry. By doing so a large area with unique Flora & Fauna and an even more important biodiversity established over decades will be lost. The area is in high use by local residents for all sorts of activities and has been vital, especially during the pandemic when there is not much else to, for peoples' mental health. Many volunteers look after the area so everyone can enjoy it. If the council stands true to its ambitions it should stop any quarry activities and instead make this a protected nature reservoir.	
A2.4	David Mitchell (by email) 23 March	Low carbon economy may be more accurate as a descriptor? Low carbon transition and a more sustainable future provides more than economic and natural benefits - socio economic, health and wellbeing, ethical and sustainable procurement and living, environmental, etc. What does a 'climate ready area' look like??	The benefits suggested are referred to elsewhere in the draft Plan. 'Climate readiness' will be dealt with in Climate Adaptation work.
A2.5	Tom Palmer (Engage Stirling platform) 29 March	An excellent read but why is it taking so long? The title is a climate emergency and the response to covid has shown that actions can be taken quickly when there is the will to do so. Targets for actions in 2030, 2035, 2045 demonstrates that you have not yet grasped the seriousness of the climate emergency, the impact of which could be far, far worse than the pandemic. Take at least 10 years off each of the targets.	The Council has aligned with the Scottish Government's targets in the first instance, but aims to better them wherever possible. While setting targets is a useful exercise, the key is to reduce carbon emissions from all the actions we all take as quickly as we can. The adopted Plan has new pages 36 & 37 inserted to highlight some of the projects being delivered while supporting documents are developed.
A2.6	Susan Dyer (Engage Stirling platform) 8 April	While it is good that you are aiming to be net zero carbon in your own operations by 2035, quite frankly that is too late. It is disappointing not to see anything on housing in this section.	This target uses an end date which the Council aims to improve upon as legislation and regulation catches up. While setting targets is a useful exercise, the key is to reduce carbon emissions from all the actions we all take as quickly as we can. Homes, housing, and buildings are referenced throughout the document, but especially under Objective 1: <i>Energy Use and Generation</i>
A2.7	GWH (Live event) 14 April	Can I ask on what basis the Council decided on Net Zero by 2045 target instead of 2030 as other Councils have?	<i>Answer provided during the Live Event:</i> Stirling Council has aligned with the Scottish Government's target in the first instance, but aims to better that wherever possible. While setting targets is a useful exercise, the key will be reducing carbon emissions in all the actions we can as early as we can.
A2.8	Green Action Trust	Green Action Trust (GAT) broadly supports the aims and objectives set out within the draft plan. As the organisation responsible for driving forward the delivery of the Central Scotland Green Network (CSGN)	Noted

	<p>(by email) 23 April</p>	<p>initiative, we are pleased to see a Plan produced that clearly sets out the vision and objectives that Stirling Council is seeking to adopt to help address the Climate & Nature Emergency. We similarly welcome the inclusion of the cross cutting principles of Lead/Enable/Inspire which clearly sets out Stirling Councils role going forward.</p> <p>The Plan forms a foundation for Stirling to deliver on a range of current policy/agenda areas, and by it's nature is a high level document that references a number of complimentary strategies and action plans that will provide more detail on how the vision & objectives will be achieved. However, we feel inclusion of specific references to how the plan aligns with the CSGN initiative would be beneficial.</p> <p>We strongly agree with the Plans focus on 'just transition' and the importance of not exacerbating existing inequalities, but directly addressing them.</p> <p>GAT is well placed to support Stirling Council in the delivery of several the objectives/priorities outlined in the Plan as follows. <i>[Feedback comments inserted under relevant Theme heading below]</i></p> <p>Thank you for the opportunity to comment on the draft Plan, and we look forward to continuing to work with Stirling Council in the future to deliver our shared priorities</p>	<p>As stated, the Plan is high level so does not have the space to highlight all the partners the Council needs to work with to implement it. There is more capacity for inclusion of suggested references and closer alignment with the work of partners in relevant theme documents, such as the Alive with Nature Plan.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>
<p>A2.9</p>	<p>Name provided (by email) 29 April</p>	<p>This document has vision but is it as visionary as it claims to be? The dates all seem too far into the future and cuts too little. There needs to be intermediate targets set so that the cuts can be monitored on a more regular basis.</p> <p>In light of the Prime Minister's announcement to speed up reductions in greenhouse gas emission the targets and target dates of this document need to be revisited.</p> <p>Quicker harsher cuts early on reduce total greenhouse gas emissions faster than leaving actions to the last minute.</p> <p>Page 9: Whilst there has been cuts in greenhouse gas emissions in the Industrial and Commercial and the Domestic sectors little progress, if any, has been made in the Transport and Carbon Capture sectors. These two areas need addressing as the 'low hanging fruit' of the Industrial -Commercial - Domestic sectors have been harvested and further cuts in these areas are now more difficult to achieve.</p> <p>Page 10: Indirect carbon emissions in scope 3 should also include emissions from investments in fossil fuel companies. These investments</p>	<p>The Key Enabling Actions section (pages 30-35) outlines action to monitor progress in delivering the Plan. In addition, annual updates are included in the Council's statutory Public Bodies' Climate Duties Report, submitted to Scottish Government as a requirement of the Climate Change (Scotland) Act 2009: https://www.stirling.gov.uk/planning-building-the-environment/sustainable-development/what-we-are-doing/</p> <p>The Council has aligned with the Scottish Government's targets in the first instance, but aims to better them wherever possible.</p> <p>Agreed</p> <p>Noted</p> <p>Divestment from fossil fuel investments is an action in the Sustainable Growth Agreement, signed with SEPA in August 2018, but Stirling</p>

		are made largely through the council's pension fund. Including these emissions in the totals would give a more correct image of the council's contribution to the global greenhouse gas emission. Divestment from these funds and reinvestment in renewable energy, improving home insulation and construction, and fossil fuel free transport would speed up the council's reduction in greenhouse gas emissions and climate change.	Council is only one of a number of Councils investing in the pension scheme. Climate change is now recognised as a financial risk and Trustees continually review how this risk can be mitigated. Agreed that divested funds can be invested in cleaner business and industry and this has already begun, albeit on a small scale to date.
A2.10	RASPS (by email) 30 April	<p>3.2 We believe that Stirling should be taking bold action on the Climate and Nature Emergency acting further and faster than the nationally mandated targets of net zero carbon by 2045. Stirling has the natural, economic and social capital to accelerate change and achieve environmental and social justice. Stirling has a responsibility to fulfil the potential of Net Zero as soon as possible.</p> <p>3.3 We note that Edinburgh has set a target of 2030 to achieve Net Zero, and Glasgow has committed to become the first Net Zero City.</p> <p>3.4 RASPS is a partnership of individual organisations who have a range of viewpoints on when the target for Stirling should be achieved. Noting the ambitious targets set by other local authorities we therefore recommend that modelling is carried out on the cost/ benefits of an accelerated achievement of Net Zero by 2030, 2035 and 2040. We recommend that the outcomes of the modelling be shared with the community through effective engagement, and through consensual decision-making, a stretch target is achieved for net zero as soon as possible.</p> <p>3.5. We note that public support is behind an accelerated target. An Ipsos Mori survey in 2020 shows 45% of people believe that Scotland should bring all emissions to net zero earlier than 2045, compared to 25% who believe 2045 is the right target, and 16% who answered that there should be a later or no target.</p> <p>3.6. We recommend that the plan is updated to insert a commitment that the Council will work with the third sector to collect the data on CO2 savings from third sector activity. Supporting third sector organisations to track carbon reduction will have wider benefits such as improving health and wellbeing, increasing community pride and supporting skills, training and jobs.</p> <p>3.7. The Climate and Nature Emergency Action Plan is a local document, however it is essential that there is public awareness of the global environmental and social justice responsibilities we have in Scotland, particularly to the Global South. We recommend that the Action Plan is strengthened to denote the catastrophic impacts of climate change domestically and internationally, and the responsibility of developed countries to play their part in global economic and social justice.</p>	<p>3.2 The Council has aligned with the Scottish Government's targets in the first instance, but aims to better them wherever possible. While setting targets is a useful exercise, the key is to reduce carbon emissions from all the actions we all take as quickly as we can.</p> <p>3.3 Noted. Different Councils (and other organisations) have made a variety of commitments and all are grappling with the most effective ways to meet them. Nobody has all the answers.</p> <p>3.4 End point targets can be a useful indicator of ambition but it is the total amount of CO₂ released on the way to the target that is most important for achieving climate change goals. This is because end point targets can be met with different amounts of total CO₂ emissions, depending on the reduction pathway followed. So yes, deeper cuts made sooner following appropriate action by all of us will have the greatest impact.</p> <p>3.5 Noted</p> <p>3.6 The Council reports estimated emissions from its own operational activity in mandatory annual Public Sector Climate Change Duties reports to Scottish Government. Emissions from third sector activity are included in area-wide emissions reporting in these documents. Should 3rd sector organisations wish to report more detailed emissions from their own activity then the Council encourages them to work together to do so.</p> <p>3.7 Additional text has been inserted into the section on <i>Climate Change in Stirling</i> on page 6 to emphasise these issues.</p>
A2.11	Riverside Community Council (by email) 3 May	Riverside Community welcomes the CaNE Plan proposal and recognises the importance of a community approach from the top levels of the Scottish Government to the choices individuals can make.	Noted

A2.12	<p>Transition Stirling membership (by email and Engage Stirling platform) 4 May</p>	<p>Targets</p> <p>Firstly, we'd like to address the target of net zero by 2045. How does this plan compare with the recommendations set out in the IPCC report - i.e. are the targets in line with what's needed to stay well below 2 degrees warming; do the priority actions match with what's recommended in the report?</p> <p>A reminder also that the IPCC report is considered by many to be something of a "best case scenario" and that we really need to be doing everything we can to push beyond what's recommended in there, particularly as every fractional degree of warming or biodiversity loss ultimately represents lives lost to climate change.</p> <p>Members think that any of the targets or actions that don't at least match their recommendations need to be revised. We need to be thinking not about what's achievable but what must be achieved and working backwards from there. This is especially true, as at a presentation on the plan, it was explained that Stirling Council has unique opportunities with its land area and location that make it easier for us as a council area to reduce emissions. We should therefore have significantly higher targets than other council areas.</p> <p>Public support is behind an accelerated target. An Ipsos Mori survey in 2020 shows 45% of people believe that Scotland should bring all emissions to net zero earlier than 2045, compared to 25% who believe 2045 is the right target, and 16% who answered that there should be a later or no target.</p> <p>There was concern from some members that "net zero" wasn't clear enough- for example, is there a danger of this being achieved by buying carbon bonds?</p>	<p>The graph on page 9 (area-wide emissions) includes a projection using analysis by the Tyndall Centre for Climate Change Research, which extrapolates the emissions reductions required by the UK Government to meet Paris Agreement targets and applies this to the Stirling Council area (dotted red line).</p> <p>The IPCC report includes a number of scenarios: the one most-frequently referred to is the one which projects the middle route between best-case (i.e. maximum emissions reduction) and worst-case (i.e. little emissions reduction). The early evidence on measured global emissions indicates that emissions are higher than this middle route scenario.</p> <p>End point targets can be a useful indicator of ambition but it is the total amount of CO₂ released on the way to the target that is most important for achieving climate change goals. This is because end point targets can be met with different amounts of total CO₂ emissions, depending on the reduction pathway followed.</p> <p>Noted</p> <p>The Council has no intention of purchasing carbon off-sets but intends to use natural carbon sinks to take up and store residual emissions (and potentially carbon capture and storage methods, should they become feasible at scale).</p>
A2.13	<p>NatureScot (by email) 5 May</p>	<p>We fully support the vision and objectives of the plan, and the level of ambition demonstrated by Stirling Council in seeking a just, equitable and ethical transition to a fossil-fuel free and climate-ready area by 2045.</p> <p>We welcome Stirling Council's leadership in aiming to reduce the environmental impact of your own operations. Nature Scot will help deliver a reduction in the Stirling area-wide environmental impact by reducing our own organisational carbon footprint.</p> <p>We also welcome 5 year Action Plan and will continue to work with you to deliver the actions in the Alive with Nature Action Plan. We appreciate that the plan is a strategic document but suggest that you develop a more comprehensive Action Plan or route map to drive the delivery of the targets set out in the Draft Climate and Nature Emergency Plan.</p> <p>We would also encourage you to align the delivery of the objectives with similar plans and projects in neighbouring authorities to deliver the Just Transition across the wider area. Working closely with neighbours, including Edinburgh and Glasgow, will help to deliver synergies and consistent actions across central Scotland.</p>	<p>Noted</p> <p>Noted</p> <p>More comprehensive Action Plans will be developed for plans supporting each of the themed Objectives</p> <p>Noted</p>

		We look forward to continuing to work with Stirling Council and the Sustainable Stirling Partnership to develop and deliver the Draft Climate and Nature Emergency Plan for the Stirling Area.	Noted
A3. Plan Objectives			
A3.1	David Mitchell (by email) 23 March	<p>The objectives are not wrong but seem high level in some and too specific in others.</p> <p>Key themes that should be covered in this plan ;</p> <ul style="list-style-type: none"> • Understanding impacts and adaptation measures • Energy and carbon • Circular economy • Sustainable commerce • Sustainable and ethical procurement • Biodiversity • Sustainable travel 	<p>The themes mentioned are covered in the following pages:</p> <ul style="list-style-type: none"> • Understanding impacts and adaptation measures – pages 27 to 29 • Energy and carbon – pp 9, 10, 15 to 17 • Circular economy – pp 21 to 23 • Sustainable commerce – not clear what's meant here. Economic development on p 31, Regional Economic Strategy referred to throughout, and Circular Economy pp 21 to 23. • Sustainable and ethical procurement – pp 21 to 23 & 34 • Biodiversity – pp 24 to 26 • Sustainable travel – pp 18 to 20
A3.2	Rachel Nunn (by email) 12 April	<p>Specifically to this part of the plan: where does energy efficiency sit? In (1) or (3)? In terms of delivery, one would imagine (1); energy efficiency needs to be explicitly stated in the plan given it is a precursor (ie reduce energy demand) to implementing low or zero carbon heating systems & we are now looking at the harder to treat homes - a massive task and should be a headline objective.</p> <p>Under transport - also with 'reduce' in mind - we need to consider how we will support a reduction in journeys; not just how we will make them greener;</p> <p>Under 'Resource Efficiency' - I know Circular Economy is pulled to the fore later in the strategy, but it could do with being here & I think we should be giving a nod to harmful consumption - because there is a hierarchy - as opposed to all consumption.</p> <p>Overall I feel the objectives would be better articulated as</p> <ol style="list-style-type: none"> 1) reducing carbon in buildings 2) reducing carbon in transport 3) reducing carbon in local industries and businesses 4) reducing carbon in local land use (farming, forestry, fishing etc) 5) reducing carbon in consumption 6) protecting and enhancing biodiversity 7) climate adaptation 	<p>We will follow the energy hierarchy whereby the steps are to reduce energy demand; improve energy efficiency; then sustainable renewable energy production; low carbon generation; and sources of last resort, which are offset through carbon capture/sequestration. Removing poor energy efficiency as a driver for fuel poverty is also key to meet the fuel poverty target. The Regional Energy Masterplan (REM) will be implemented on a 'fabric first' basis. This will be broken down into area-based schemes to ensure solutions are tailored to local needs. The REM will model the least cost, carbon neutral configuration across the built environment on an area based and zonal basis, incorporating area-based delivery programmes (e.g. local building measures, energy efficiency programmes, insulation, individual heat pumps) as well as larger scale measures (e.g. district heating; large-scale solar).</p> <p>Through our emerging Local Transport Strategy and Local Development Plan we will bring forward interventions which holistically seek to reduce unnecessary journeys throughout the Stirling Council area. This work will build upon current projects such as Walk Cycle Live Stirling and City Centre South.</p> <p>Noted</p> <p>The consultation draft incorporates the objectives suggested as follows:</p> <p>1-5: in Objectives 1-4, Energy, Travel, Resource Efficiency, and Nature & Biodiversity 6: in Objective 4, Nature & Biodiversity 7: in Objective 5, Climate Adaptation</p>

		<p>In addition:</p> <p>a) I think the carbon literacy is HUGE - and we could have an objective here too: x% of council employees / senior management obtain a climate literacy qualification: like the one run by RSGS. An example of this might be unintended consequences from reducing brown bin collection in a hope that people will home compost. Mike Berners-Lee has run the calculations on this; and if people don't turn their compost, then their unturned compost creates methane. Worse, people might burn their damp garden rubbish with all the particulates that produces. If Stirling Council knew this, and have run the calculations, I'll stand corrected, but if not...then it highlights just how important detailed carbon literacy is, as a requisite amongst decision makers.</p> <p>b) There needs to be an objective & specific target around active and tangible public engagement : the council will no doubt be delivering the energy efficiency scheme to eg owner-occupiers - so how is it going to do this?</p> <p>On a wider note, public engagement around the whole topic, and for each area of reduction, needs to be incredibly creative, going way outside the council's comfort zone I suspect; it needs to be knowledgeable, specific, inspiring and ubiquitous. There needs to be scrutiny that there other departments do not send out conflicting messages.</p>	<p>a) Agreed: The section on Key Enabling Actions (pp 30-35) highlights carbon literacy, skills development, and community engagement.</p> <p>b) The report to 24 June Council includes an action to prepare a Climate Emergency Community Engagement Plan in line with the Council's corporate Community Engagement Plan framework.</p> <p>Noted</p>
A3.3	RASPS (by email) 30 April	<p>Signatories of this consultation response are supportive of the five main objectives of the Climate and Nature Emergency Plan which demonstrate the breadth of actions needed to achieve our collective aims.</p>	Noted
A3.4	Transition Stirling membership (by email and Engage Stirling platform) 4 May	<p>Objectives We like the 5 objectives and agree they are the correct ones, but would like to see one about food. This could include, for example, food growing or initiatives like meat free days at schools or canteens.</p> <p>Lead We like that it begins with the Council leading on each objective as it shows that the Council is ready to make the changes, rather than telling other people to do something the Council itself isn't willing to do. Members also liked that in the presentation it discussed how everyone has responsibility, rather than just the Council as we need to encourage individual participation.</p>	<p>A Key action in the Resource Efficiency section on page 23 is to <i>develop a Sustainable Food Plan to increase access to local, affordable, healthy food, promote a vibrant sustainable food economy, and reduce the ecological footprint of our food system from Stirling farmers to residents' plates.</i> A new Priority R05 has also been introduced to: <i>Support development of a sustainable local food economy and minimise the impacts of food choices.</i></p> <p>Noted</p>
A3.5	NatureScot (by email) 5 May	<p>We would be pleased to continue to work with you to deliver the five objectives in the Plan through our membership of the Sustainable Stirling Partnership.</p>	Noted
Energy Use and Generation			
A4. Energy: Priorities			
A5. Energy: Targets			

A5.1	Tom Palmer (Engage Stirling platform) 29 March	The improvement in homes at EPC C or better is less than 3% per year. Is that really the best we can do? A 2030 target is only 6% per year. Given the impact this will have on energy demand and fuel poverty we need to be bold and exceed national targets	These targets are a minimum that we would hope to achieve. Although we are aligning with national targets, Stirling Council, with the support from residents and businesses, would hope to exceed these national targets across all Plan areas
A5.2	Susan Dyer 8 April	Sadly, these are very vague and lacking in ambition.	Noted
A5.3	Name provided (by email) 13 April	<p>As in the comments above, this is a section where it would be useful to provide some context on Scotland and UK wide trends, and be clear about the way in which Stirling Council's actions will integrate with those. The table on page 16 could be adapted to show this by adding a column to make it clear where Stirling Council is proposing to go beyond those commitments.</p> <ul style="list-style-type: none"> - Moves to decarbonise the electricity grid are overwhelmingly driven by changes in large scale generation. Contributions from individual households are helpful, especially where those systems raise awareness and improve energy affordability, but are not going to be a cost effective way of generating low carbon electricity overall. - It is not clear why the aim of matching local demand and local supply is included? What matters for the climate is that these are balanced at the level of the national grid. - In contrast, large scale improvements to the energy efficiency of both domestic and non-domestic buildings are essential if emissions associated with heat are to be reduced in line with overall targets. <p>This is an area where there is much more potential for Stirling Council to act, building on the welcome successes described in relation to Council housing, by providing advice services which can help (private) householders understand what measures are most suitable for their homes and what support is available to help the install those measures.</p> <ul style="list-style-type: none"> - As for the Council's own emissions, it would be helpful to clarify the extent to which emissions reductions described have been delivered by grid decarbonisation, as distinct from local generation and energy efficiency. 	<p>Local, decentralised energy systems are ones which find ways to link the supply and demand of energy services within an area across electricity, heat and transport, delivers real value to everyone in local areas, and support the growth of vibrant, net zero local economies. This brings sustainable, affordable sources of power and leads to security of supply and resilient communities. The 3 key principles are:</p> <p>A stable, managed energy transition: to decarbonise the whole energy system in line with the Climate Change (Emissions Reduction) (Scotland) Act 2019 while ensuring residents and businesses have secure and affordable energy supplies</p> <p>An integrated 'whole system' view: with equal consideration of energy supply and consumption resulting in investment in infrastructure which brings direct benefits to communities, including energy cost savings; resilience and security of supply; positive impacts on (fuel poverty (including removal of energy efficiency as a driver for fuel poverty)); and assisting in the regeneration of areas</p> <p>A truly local vision of energy provision: promoting local energy solutions, planned with community involvement. This will ensure that heat, energy and renewables opportunities are optimised in a safe, sustainable, end-user focused manner with community energy at its core, ensuring that energy master-planning responds to local needs</p> <p>We work with public partners, including Home Energy Scotland (www.homeenergyscotland.org) who offer free, impartial advice on energy saving and renewable energy solutions (as well as other areas such as greener travel) in order to help people in Scotland create warmer homes, reduce energy bills and help tackle climate change.</p> <p>A detailed breakdown of corporate carbon emissions is provided in the Council's annual Sustainable Stirling Report, submitted to Scottish Government as a requirement of the Climate Change (Scotland) Act 2009: https://www.stirling.gov.uk/planning-building-the-environment/sustainable-development/what-we-are-doing/</p>
A5.4	Name provided (by email) 29 April	1. Bring forward the date for all new home consents to have renewable or low carbon heating by one year to 2023. Solar panels to be fitted to all new builds from 2022. All new builds should also include electrical charging points for vehicles. It is cheaper, easier and more efficient to put all these things in place in new builds than trying to retro-fit them. This will cut the	The targets outlined in the Plan are a minimum that we would hope to achieve. Although we are aligning with national targets, Stirling Council, with the support from residents and businesses, would hope to exceed these national targets in all areas. The renewable and low carbon heating target is a national regulatory Building Standards target. There are also increasing targets with regards to Energy Performance

		<p>capital cost for the person who buys. With social housing this could benefit the council medium to long term.</p> <ol style="list-style-type: none"> 2. Bring forward the 2045 date for retro-fitting all council houses to meet the minimum Energy Certificate Performance Certificate B standard by five years to 2040 with approximately 60% reaching the standard by 2035. 3. Whilst welcoming the target to reduce carbon emissions in council housing stock to an average of 2 tonnes per household by 2030 this type of household historically have a much lower carbon emission total than owner occupier housing. Can a target be set for owner/occupiers and private landlords as well? 4. Could the council look at microgeneration of electricity from water courses in the county. The Bannockburn used to power some mills could it not also power a small generator or two along its length. 	<p>Certificates for new builds and existing buildings, which follow the energy hierarchy. The key is to reduce energy demand, improve energy efficiency, and then use renewable and low carbon energy to meet what demand remains.</p> <p>Scottish Government are investigating legislation to prescribe a minimum level of energy efficiency for homes in the Scottish Private Rented Sector. Failure to comply could see landlords removed from the Scottish Landlords Register. With owner-occupiers, it is recognised that funding may need to be put in place to ensure owner-occupiers can afford to meet any mandatory targets put in place.</p> <p>Micro hydro has been investigated in various locations across the Council area, by community groups and also by the Forestry Commission on land they own. Feasibility has been carried out previously in Bannockburn by the Development Trust looking at viable schemes on this stretch. Callander Development Trust have a successful micro hydro scheme and we would hope that the Regional Energy Masterplan would identify other viable schemes similar to this for delivery by various delivery models – community/public/private and joint venture.</p>
<p>A5.5</p>	<p>Louise Waters (Engage Stirling platform) 3 May</p>	<p>The first of the two 'Council Targets' (Implement measures in Council housing stock to reduce carbon emissions) needs to be clarified - is this carbon emissions from household energy use only or total carbon emissions attributable to households? The 2019/20 average reported suggests that this may be total carbon emissions, in which case this target actually goes beyond energy use and generation (potentially including transport, food, non-food consumption etc.). The second 'Council Target' and various other text refers to 'low carbon energy'. To be meaningful, this term needs to be defined - ideally with a kgCO₂e/kWh metric (kWh of useful energy). This will guide the implementers of the Plan when they are faced with choices between energy sources that are cleaner than fossil fuels, but not (yet) zero carbon - such as grid electricity. The various 'types' of hydrogen (different provenances) have very different associated greenhouse gas emissions. Unless a very weak/generous definition of 'low carbon' is used, the Forthside Heat Network will need to decarbonise and stop burning natural gas.</p> <p>I would welcome more interim targets. We need action in 2021 (and every year after), and targets with 2030 or 2032 dates are likely to be deprioritised relative to shorter term objectives. Publishing some working targets for 2025 targets would be helpful, while communicating that these are subject to revision following the production of the Regional Energy Masterplan. (Indeed I am worried that action may be suppressed while the development of the REM is in progress - could the Council commit to some 'no regrets' action straight away?) I applaud the commitment to only install low carbon and/or renewable heating and</p>	<p>The 'reduce carbon emissions in Council housing stock' is total carbon emissions attributable to households.</p> <p>The Regional Energy Masterplan will use a local, area-based approach over a 25-year period, sufficiently broken down into 5-year phasing and aligned with targets so there will be various interim targets within the Regional Energy Masterplan. This will highlight the long-term direction of travel as well as near term opportunities. The Regional Energy Masterplan will be broken down into area based schemes to ensure solutions are tailored to local needs. We will follow the energy hierarchy whereby the first step is to reduce energy demand; then improve energy efficiency; sustainable renewable energy production; low carbon generation; and sources of last resort which are offset through carbon capture/sequestration. The Regional Energy Masterplan will model the least cost, carbon neutral configuration across the built environment on an area based and zonal basis, incorporating area-based delivery programmes (e.g. local building measures, energy efficiency programmes, insulation, heat pumps) as well as larger scale measures (e.g. district heating; large-scale solar).</p> <p>The Forthside Heat Network reduces carbon emissions as a result of heat being provided from a central, largely decarbonised solution as opposed to carbon intense individual systems but we are working towards being fully decarbonised with the gas CHP, which provides</p>

		power systems in Council buildings and housing stock from 2022. However, I think the Council could also hold ambitions with respect to enabling residents to adopt renewable heating systems. Under the Heat Networks Act, the Council will have a role to play in the future in facilitating the deployment of heat networks to serve properties that have few options for standalone renewable heating systems (heritage buildings, higher-density housing). I think the Plan should include facilitation of heat network deployment as a Key Action to deliver Objective 1.	electricity to the Scottish Water site as well as a portion of heat to the network, being swapped for a fully decarbonised solution in time.
A5.6	Transition Stirling membership (Engage Stirling platform) 4 May	There doesn't seem to be any sense of integration between this plan and the recently published Scottish Government Heat and Building Strategy. For example, within the table there is an interim target of 100% EPC C or better by 2040 for all homes in the Stirling Council area. In the Scottish Government strategy, there is an interim target of 100% by 2035. This would suggest this strategy hasn't been consulted at all.	The Heat and Building Strategy was published after the Council document was drafted. The Regional Energy Masterplan, being developed over 2021/22, will comprehensively consider the Heat and Building Strategy.
A6. Energy: Actions			
A6.1	David Mitchell (by email) 23 March	<ul style="list-style-type: none"> • First step to ensure energy efficiency in buildings has to be external envelope operation - i.e. assets require to be in a good state of repair and wind and watertight. • Interventions to existing buildings need to be technically competent, understand how pre-1919 buildings function work particularly and not be overly reliant on high carbon unsustainable processes - e.g. UPVC windows and doors - short design life / high toxicity. • Council has led innovative heat transfer activity in Forthside - surely this could be replicated? • Energy efficiency measures can cause negative and unintended consequences unless adequately understood - lack of ventilation and 'air tightness' can lead to health issues particular - respiratory issues for occupants. • Council should have a policy of re-use of existing built assets over new build to minimise embodied carbon loss and investment in new build, unless that new build is truly sustainable. • Design life of new build should be set to 100 years as a default. • The educational requirements to deliver here are high - the Council might consider how it uses the school network and other routes to communication to increase awareness and participation. 	<p>Agree – the Regional Energy Masterplan will be implemented on a 'fabric first' basis. This will be broken down into area based schemes to ensure solutions are tailored to local needs. We will follow the energy hierarchy whereby the first step is to reduce energy demand; then improve energy efficiency; sustainable renewable energy production; low carbon generation; and sources of last resort which are offset through carbon capture/sequestration.</p> <p>The Forthside District Heating Network was successful in its funding application directly as a result of being scalable and replicable across the Council area and across Scotland. Similar projects are now being implemented in other Local Authority areas and we will continue to investigate areas where we could replicate this project, particularly in areas where we could provide heat to domestic customers and help to alleviate fuel poverty.</p> <p>Regarding the school network: as well as being useful to increasing interest in careers in the renewable and low carbon sector, are also a useful way to spread messages regarding reducing energy demand, improving energy efficiency and information on renewable and low carbon systems from school attendees to parents and carers. Similar methods have been used previously by Waste Services and saw increase in uptake in recycling in areas, so this will also be a useful tool around energy messaging.</p>
A6.2	Rachel Nunn (by email) 12 April	Under 'Lead in our own operations' there is no SMART goal for the emissions reductions within the council estate & these emissions are not included in earlier targets. I'm amazed there is not already a robust calculation of the corporate carbon footprint. What I'd expect to see here is:	The Regional Energy Masterplan will be broken down into area based schemes to ensure solutions are tailored to local needs. We will follow the energy hierarchy whereby the first step is to reduce energy demand; then improve energy efficiency; sustainable renewable energy production; low carbon generation; and sources of last resort which are offset through carbon capture/sequestration.

	<p>a) Stirling council working with energy networks and communities so we can understand who might switch to 100% hydrogen; who is going to be on district heating; who will have to switch to heat pumps. This would be a communication as well as a planning and infrastructure undertaking.</p> <p>b) Clearly Zero Waste Scotland are producing the detail of Scottish councils' role in reducing heating in domestic buildings, but we know from reviews of previous schemes that the role will be huge; householder engagement, homes assessments; intermediary role to support access to suppliers & possibly also to finance: but I'd expect to see some detail in this strategy of what this role is going to look like. There needs to be activity now to support local suppliers and builders to attain the Quality Mark; there needs to be some description of how rural homes will be supported as potentially harder to treat and more costly to treat; there needs to be some intimation of how planning will support the process and how the house assessment process may work – eg in-house surveyors or partnership with local surveyors, architect technicians and architects.</p> <p>In short I'm expecting Stirling Council to show a lot more leadership than simply activity in its own estate; the Scottish Government is expecting a full leadership and support & delivery role in energy efficiency and generation by local authorities for all homes in their areas. The last 18 years have been about encouraging, and now we have to 'do'. Producing a costed regional energy masterplan: clearly this plan should then also mention work undertaken to get the finances & partners – and of these what proportion will be national and community - to deliver the plan with a number of interim targets through time until we reach the overall goal of 95% by 2045.</p> <p>We need to be careful about saying that switching to zero carbon / low emissions heating systems will = cheaper bills...as electricity is not VAT subsidised (unlike oil and gas), bills are rarely cheaper and can often be more expensive. This is recognised at Scot Gov level.</p> <p>I don't really get any idea how updating the LDP and LHS is going to help us reach our targets: it would be helpful to have had this section of the strategy be specific in the consequences (ie presumably delivery actions?) and related to the targets. The same goes for integrating job opportunities etc into the Regional Economic Strategy: what is this specifically going to achieve in terms of consequences & how does this relate to the targets?</p> <p>In short – the 'enable' and 'inspire' are not the right approach; this is what we've been doing for almost two decades and is why there is now such a lot still to achieve in such a short space of time. This section of</p>	<p>The Regional Energy Masterplan will model the least cost, carbon neutral configuration across the built environment on an area based and zonal basis, incorporating area-based delivery programmes (e.g. local building measures, energy efficiency programmes, insulation, heat pumps) as well as larger scale measures (e.g. district heating; large-scale solar).</p> <p>Utility companies are key stakeholders in the Regional Energy Masterplan and the proposed identified solutions, taking into account future plans for the networks. All viable solutions will be investigated on an area by area basis to meet the local needs and a decarbonised heat zoning layer will identify the best solution, whether that be hydrogen, district heating, heat pumps or other heat solutions. Utility companies will be engaged at all points of the Regional Energy Masterplan, as will the local communities, to ensure everyone has multiple opportunities to provide input, comments and feedback and ensure that any changes happen with our communities and not to them.</p> <p>The Regional Energy Masterplan covers the full area, including all households, businesses and premises, not just the Council estate. It also includes Council land assets.</p> <p>By implementing the Regional Energy Masterplan on a fabric first basis and following the energy hierarchy, the aim is to ensure affordable heat – i.e. that residents will be able to afford warm homes from reduced energy demand as a result of improved energy efficiency and the associated health and wellbeing and improved social outcomes that warm homes bring as well as ensuring supply via renewable and low carbon energy sources.</p> <p>Noted</p>
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<p>A6.3</p>	<p>Name provided (by email) 13 April</p>	<p>In relation to the approaches for this objective:</p> <p>Many of the actions under 'Lead' are administrative, and could be kept internal; writing an action plan does not, in itself, change anything. It would though be helpful for the Council to commit to publish a quantified annual progress report showing how emissions are being reduced, and the commitment to phasing in low carbon heating is a clear and welcome concrete measure.</p> <p>The actions under 'Enable' are all welcome, but could be clearer.</p> <ul style="list-style-type: none"> - As above, it is not clear why an energy masterplan is needed, given decisions on electricity generation and options for decarbonisation of the mains gas grid are made at national level. - The commitment to require low carbon heating in buildings consented from 2024 does not seem ambitious, given that is a proposed SNP commitment at national level, and also given the Council is taking a much stronger approach in its own buildings, as above. Given the delay between consent and construction, this implies buildings will still be constructed in Stirling at least until 2025 / 26 which are increasing emissions – this does not seem consistent with the challenging targets required for emission reductions by 2030. - A commitment to phase out high any carbon activity from the Regional Economic Strategy will also be necessary. To avoid economic dislocation, this will require planning in line with Just Transition approaches. - Finally, the targets for improvement of Council houses should sit within the 'Lead' section. It would however be very welcome for the Council to put in place support to 'enable' private householders to better understand what they can do to improve the energy efficiency of their own homes and to highlight the availability of support for these actions (for example, how to access grants or loans for insulation or renewable heat). 	<p>Local, decentralised energy systems are ones which find ways to link the supply and demand of energy services within an area across electricity, heat and transport, delivers real value to everyone in local areas, and support the growth of vibrant, net zero local economies. This brings sustainable, affordable sources of power and leads to security of supply and resilient communities. The 3 key principles are:</p> <p>A stable, managed energy transition: to decarbonise the whole energy system in line with the Climate Change (Emissions Reduction) (Scotland) Act 2019 while ensuring residents and businesses have secure and affordable energy supplies</p> <p>An integrated 'whole system' view: with equal consideration of energy supply and consumption resulting in investment in infrastructure which brings direct benefits to communities, including energy cost savings; resilience and security of supply; positive impacts on (fuel poverty (including removal of energy efficiency as a driver for fuel poverty)); and assisting in the regeneration of areas</p> <p>A truly local vision of energy provision: promoting local energy solutions, planned with community involvement. This will ensure that heat, energy and renewables opportunities are optimised in a safe, sustainable, end-user focused manner with community energy at its core, ensuring that energy masterplanning responds to local needs</p> <p>The Regional Energy Masterplan will be broken down into area based schemes to ensure solutions are tailored to local needs. We will follow the energy hierarchy whereby the first step is to reduce energy demand; then improve energy efficiency; sustainable renewable energy production; low carbon generation; and sources of last resort which are offset through carbon capture/sequestration.</p> <p>The Regional Energy Masterplan will model the least cost, carbon neutral configuration across the built environment on an area based and zonal basis, incorporating area-based delivery programmes (e.g. local building measures, energy efficiency programmes, insulation, heat pumps) as well as larger scale measures (e.g. district heating; large-scale solar).</p> <p>We work with public partners, including Home Energy Scotland (www.homeenergyscotland.org) who offer free, impartial advice on energy saving and renewable energy solutions (as well as other areas such as greener travel) in order to help people in Scotland create warmer homes, reduce energy bills and help tackle climate change.</p>

A6.4	Louise (Live Event) 14 April	What will Stirling Council do to reduce emissions from energy use in the second half of 2021, before the Regional Energy Masterplan is complete?	<p><i>Answer provided during the Live Event:</i></p> <p>Stirling Council are continuing to install solar PV and battery storage on housing stock, and retrofitting renewable and low carbon energy systems in our existing schools and public buildings in order to reduce carbon emissions. The Castlevue Low Carbon Hub is close to completion, whereby solar canopies with battery storage and integrated electric vehicle chargers have been built on the Park & Ride car park, producing renewable energy to meet the increasing electrical demand from electric vehicles. The renewable energy produced also powers the building on site and the street lighting. This will lead to a reduction in carbon emissions and battery storage will maximise the renewable energy used and minimise losses. We are looking to replicate this solar canopy project across the car park estate, ahead of the completion of the Regional Energy Masterplan. We are also investigating opportunities to expand Stirling's district heating network to provide low cost, low carbon heat to additional buildings in the Forthside area, again, ahead of the completion of the Regional Energy Masterplan.</p>
A6.5	University of Stirling Biological & Environmental Science students (by email and Engage Stirling platform) 4 May	<p>The vision is aspirational but this section lumps a lot of complex aspects of the energy system into one objective. Energy use here seems to mostly refer to electricity and heating with transport being a separate objective. It also includes commercial, domestic and industry sectors. I suspect the Masterplan will provide the details but the action is only to produce the Masterplan, not action it.</p> <ul style="list-style-type: none"> • Communication, training and maintenance are all key aspects of ensuring the successful implementation of low carbon technology (supporting behaviour change) – and must be a priority in the strategy. • This section does not mention water use and the carbon emissions associated with water treatment. What about including water efficiency alongside other changes to council buildings? • More emphasis on community energy initiatives and community support. 	<p>The Regional Energy Masterplan will ensure that solutions are identified which integrate sustainable energy generation and sustainable transport at a local level, including potential for renewable energy to meet increasing electrical demand as a result of modal shift to electric vehicles / hydrogen production. Energy is being looked at within the Masterplan as intrinsically linked to transport. This will ensure:</p> <ul style="list-style-type: none"> • a stable, managed energy transition: ensuring secure and affordable energy supplies • an integrated “whole systems” view: consideration of energy supply and consumption equally • a truly local vision of energy provision: promoting local energy solutions, planned with community involvement and will involve engagement with residential, commercial and industrial stakeholders, as well as the utility companies. <p>Behaviour change is also identified as key in meeting targets and stakeholder engagement across all sectors and demographics is a key element of the Masterplan.</p> <p>A detailed breakdown of Council emissions is provided in the Council's annual Sustainable Stirling Report, submitted to Scottish Government as a requirement of the Climate Change (Scotland) Act 2009: https://www.stirling.gov.uk/planning-building-the-environment/sustainable-development/what-we-are-doing/</p> <p>Community energy is a key part of the Regional Energy Masterplan. The Masterplan will model the least cost, carbon neutral configuration across the built environment on an area based and zonal basis, incorporating area-based delivery programmes (e.g. local building measures, energy efficiency programmes, insulation, individual heat pumps) as well as larger scale measures (e.g. district heating; large-</p>

		<ul style="list-style-type: none"> • Funding needs to be made available in order to make changes inclusive. More detail on what changes are going to be expected of individuals and businesses would be good, as it is very vague at the moment • There is a high level of hidden ‘fuel poverty’ in the area. The definition of fuel poverty does not capture this. Could we change this priority to eradicating cold homes and high fuel bills – this would be achievable through improved energy efficiency and low cost, low carbon energy. Eliminating fuel poverty needs more than just those. • Can the date for all new housing to use renewables/low carbon heating be brought forward? 	<p>scale solar). This will then enable communities to see opportunities within their local area which they may choose to take forward as a community group.</p> <p>It is recognised that funding may need to be put in place to ensure all residents, whether they be owner occupiers or in rental properties, are enabled to make changes.</p> <p>We have used the Scottish Government definition of fuel poverty, with the aim of providing affordable heat and warm homes to everyone across the area. The Regional Energy Masterplan works on the energy hierarchy basis – reducing energy demand and improving energy efficiency and then meeting the remaining demand with low cost, low carbon energy. As such, we will be aiming to remove poor energy efficiency as a driver for fuel poverty.</p> <p>The renewable and low carbon heating target is a national regulatory Building Standards target.</p>
A6.6	<p>Transition Stirling membership (Engage Stirling platform) 4 May</p>	<ul style="list-style-type: none"> * It only talks briefly about fuel poverty, but this is a huge area and we feel there should be more detail. * It talks about promoting opportunities for jobs and economic prosperity. This is key as right now Scottish Government wants to go toward a post-covid green recovery and a lot of people will be affected by redundancies. Scottish Government has put a lot of funding into green jobs and upskilling. This report should discuss how exactly that will be promoted and used in the Stirling Council area and how it will bridge the skills gaps to what is needed for the future supply chain, such as increasing accredited insulation installers. For example, will Stirling Council work in partnership with Energy Skills Partnership and Forth Valley College to do this? * It is great that it says that businesses will be inspired to take action. It's good that it mentions Zero Waste Scotland's resource efficient Scotland but this has since been renamed. * The report says all new homes will be required to use renewable or low carbon heating. This will be going into legislation so all new builds will need low carbon or zero carbon main sources of heating anyway. * For developments to be agreed, they should include planners, developers and architects etc. who will go above and beyond the legal minimum and reach objectives in terms of sustainability. * There is not much mention of how University of Stirling will be involved with the Environment Centre. <p>Members suggested these examples of interesting things being achieved elsewhere as inspiration:</p> <ul style="list-style-type: none"> • https://www.edinburghsolar.coop/ • Powering Parks report 	<p>Noted</p> <p>Noted – the Regional Energy Masterplan will provide more detail.</p> <p>Noted and Plan updated accordingly.</p> <p>Noted</p> <p>Noted</p> <p>This will be picked up through development and delivery of City Region Deal projects</p> <p>Noted</p>

A7. Energy: General			
A7.1	Rebecca Robertson (Engage Stirling platform) 11 March	There needs to be incentives for homeowners to upgrade their homes to be more energy efficient e.g. installation of solar panels, upgrading of windows/insulation etc. The Stirling area can't be considered to be working towards zero carbon unless its residents are on board to do the same.	Although the Council is leading on the Climate and Nature Emergency Plan, we need all residents and businesses to help us to deliver. We work with public partners, including Home Energy Scotland (www.homeenergyscotland.org) who offer free, impartial advice on energy saving and renewable energy solutions (as well as other areas such as greener travel) in order to help people in Scotland create warmer homes, reduce energy bills and help tackle climate change. It is recognised that funding may need to be put in place to ensure all residents, whether they be owner occupiers or in rental properties, are enabled to make changes.
A7.2	Anonymous (Live Event) 8 April	Stirling Council should be congratulated on the energy efficiency measures and roll out of renewable infrastructure they have supported. However their planning department still is a significant barrier to allowing Stirling residence to make a difference. In some cases not requiring enough from developers to install renewables at a significant scale and in other situations not supporting renewable/energy efficiency infrastructure roll out on individual properties by residents. What is being done to improve planning depts roll in your net zero ambitions?	<i>Answer provided during the Live Event:</i> Stirling Council area is covered by 2 x Planning Authorities (Stirling Council Planning Authority and Loch Lomond and Trossachs National Park Planning Authority). Currently Stirling Council Planning Officers are working on updates to Supplementary Guidance within the Local Development Plan to ensure the onus is on developers to ensure developments are as low carbon as possible, with regards to energy efficiency of new builds, as well as low carbon generation for properties. The National Park Planning Authority have also amended their Local Development Plan to ensure renewable installations are looked at favourably on a case by case basis. This applies to both new build and retrofitting of renewables. Both Planning Authorities will update Plans in line with National Planning Framework 4, which has a real focus on addressing Scotland's ambitious climate change and emissions reduction targets to ensure development is sustainable and progress towards zero carbon living. A key part of the net zero ambitions in relation to new developments also sits with Building Standards, e.g. from 2024, all new build developments must use low carbon or renewable heating as opposed to gas boilers, which Stirling Council Building Standards Officers enforce.
A7.3	Louise Waters (Engage Stirling platform) 3 May	I wonder whether there are additional powers that the Council might wish to have in order to deliver this Plan, and if so whether the Plan should include calling for these powers as a Key Action?	A key action in the Transport section includes a commitment on page 20 to 'Seek powers to require all new homes to be ready for electric vehicles as part of our Local Development Plan'. The Council will keep the possibility of additional powers under review and will work with others to call for these where thought essential to meet CaNE Plan aims.
A7.4	FEL (by email) 3 May	<ul style="list-style-type: none"> Stirling Council has a strong track record in innovation around sustainable and renewable energy, we believe the target for delivering energy from renewables by 2030 should be far more ambitious, with the ultimate aim being 100% by 2045. Use and reuse of land should take increased prominence throughout the plan but particularly for energy production. 	<p>Although we are aligning with national targets, Stirling Council, with the support from residents and businesses, would hope to exceed these national targets in all areas.</p> <p>The Regional Energy Masterplan covers the full Council area, including all households, businesses and premises, not just the Council building estate. It also includes Council land assets in order to identify all opportunities for renewable energy production.</p>

		<ul style="list-style-type: none"> • We would like to see that all new developments minimise energy demand and carbon emissions by adopting the energy hierarchy. • We would like to see how energy plans will improve residents health and wellbeing. 	<p>The Regional Energy Masterplan aims to ensure affordable heat and warm homes to everyone across the area. The Regional Energy Masterplan works on the energy hierarchy basis – reducing energy demand and improving energy efficiency and then meeting the remaining demand with low cost, low carbon energy. As such, we will be aiming to remove poor energy efficiency as a driver for fuel poverty. This should ensure that residents will be able to afford warm homes from reduced energy demand as a result of improved energy efficiency and the associated health and wellbeing and improved social outcomes that warm homes bring, as well as ensuring supply via renewable and low carbon energy sources with associated air quality improvements.</p>
<p>A7.5</p>	<p>Riverside Community Council (by email) 3 May</p>	<p>We feel it is important to recognise that making sustainable choices, such as solar panels, can be prohibitively expensive. This can result in a disparity between the aim of being a carbon neutral community and the average household being unable to make changes and achieve this goal.</p> <p>Community Owned energy was suggested as a consideration for some areas, particularly with regards to fuel poverty. Further information on this would help show communities that there are alternatives to the big power companies.</p>	<p>It is recognised that funding may need to be put in place to ensure all residents, whether they be owner occupiers or in rental properties, are enabled to make changes. This applies not just to solar panels, but on the ‘fabric first’ approach so that all households can reduce energy demand and improve energy efficiency and then supply the remaining (reduced) energy demand with low carbon and renewable energy. This will remove poor energy efficiency as a driver for fuel poverty and ensure all our residents can afford warm homes while also reducing carbon emissions.</p> <p>Community energy is a key part of the Masterplan. The Regional Energy Masterplan will model the least cost, carbon neutral configuration across the built environment on an area based and zonal basis, incorporating area-based delivery programmes (e.g. local building measures, energy efficiency programmes, insulation, individual heat pumps) as well as larger scale measures (e.g. district heating; large-scale solar). This will then enable communities to see opportunities within their local area which they may choose to take forward as a community group.</p> <p>The Regional Energy Masterplan is based on local demand meeting local supply through low carbon and renewable provision. Local, decentralised energy systems are ones which find ways to link the supply and demand of energy services within an area across electricity, heat and transport, delivers real value to everyone in local areas, and support the growth of vibrant, net zero local economies. This brings sustainable, affordable sources of power and leads to security of supply and resilient communities. This will ensure:</p> <p>a stable, managed energy transition: ensuring secure and affordable energy supplies;</p> <p>an integrated “whole systems” view: consideration of energy supply and consumption equally; and</p> <p>a truly local vision of energy provision: promoting local energy solutions, planned with community involvement.</p>

Transport

A8. Transport: Priorities

A8.1	Green Action Trust (by email) 23 April	<p>Priority T02 – Make Walking & Cycling easy, safe, and attractive travel options</p> <ul style="list-style-type: none"> • GAT is in the process of finalising a Blueprint for the Forth area (Stirling, Clacks, Falkirk), based on a methodology developed by Glasgow & Clyde Valley Green Network. This is a framework for the creation of strategic Green Network for the benefit of people and wildlife, and it would make a significant contribution to this priority. It will incorporate the following <ul style="list-style-type: none"> ○ a Strategic Access Network – facilitating the off-road movement of people around and between communities through Green Active Travel routes and greenspace ○ a Strategic Habitat Network – facilitating the movement of wildlife through the landscape • GAT can support direct delivery of both the Active Travel Plan and Access/Core Path Strategy through the offer of additional project development/design/fundraising/contract management capacity 	<p>We welcome the contributions of other organisations to the transport objectives set out in the CaNE Plan. This collaborative approach will greatly benefit our outcomes.</p> <p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.</p>
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A9. Transport: Targets

A9.1	Tom Palmer (Engage Stirling platform) 11 March	<p>During the presentation last week it was stated that reducing emissions in transport would be difficult to achieve I believe the opposite is true Commercial EVs are so much cheaper to run and maintain that, as soon as they become readily available, every carrier will convert Car drivers are likely to follow when they see the benefits and have access to the much cheaper vehicles which will inevitably come from China The council could accelerate the transition with the introduction of clean air zones</p>	<p>The Council is working with Transport Scotland and charger providers in order to provide a public charging network in Stirling that meets the needs of residents, businesses and visitors. As accessible charging becomes more widespread and the cost of EV ownership decreases more drivers, including fleet operators, are likely to make the switch.</p>
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A10. Transport: Actions

A10.1	David Mitchell (by email) 23 March	<ul style="list-style-type: none"> • Active Travel Hub is clearly successful and should be extended. • Charging provision needs to significantly increase and the energy used for this should be sustainable in origin. • Integrated transport systems are key and given the scale of the tourist economy Stirling should be bold in discouraging open access to vehicles at all times. Vehicles seem to still be given priority over people on arterial routes. The expectations of vehicle access to retail as default are now outdated and need to be set against other benefits. • Pedestrianise Stirling Town Centre - be bold. 	<p>The Council is keen to explore new innovate car charging technologies that make the most of the existing electrical capacity, such as lamp post chargers, as well as renewable energy in order to meet the demand for more charging provision.</p>
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		<ul style="list-style-type: none"> Stirling could look to trial 'no traffic days' and learn from the Edinburgh experience. 	
A10.2	Tom Palmer (Engage Stirling platform) 29 March	<p>To truly encourage active travel cycle paths must be a genuine network with priority given to missing links eg manor powis roundabout on the A907, Eastern villages etc</p> <p>An increase in ultra-low emission vehicles will only be achieved if there is an incentive to make the switch eg having a two mile LEV only zone around all schools would greatly encourage the move away from diesel SUVs used on the school run with a knock on benefit to children's health</p>	<p>The Council is presently working with Sustrans to progress the Manor Powis route option. Once we are in a position to share further information on this we will begin widely consulting with the community.</p> <p>Council Officers are presently progressing environmental improvements to the Eastern Villages and will be consulting with the community on this in near future.</p> <p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.</p> <p>Further to this we will be reviewing our School Travel Plans to ensure that they are fit for purpose. Since they were created we have had a global pandemic and declared a climate emergency, so clearly these need to be reviewed.</p>
A10.3	Rachel Nunn (by email) 12 April	<p>Transport is all about cost and convenience – and who pays the cost – the council or the consumer? The number one focus should be in overall demand reduction.</p> <p>Clearly there is a real tension about what can be expected / hoped for – in terms of behaviour change by able bodied, city dwellers and what can be expected of rural citizens, or the less able bodied.</p> <p>This part of the strategy has a lot of enabling actions – which are good, but I think it is optimistic to think that these alone will deliver 45% of all vehicle ownership by 2032 being low emissions vehicles or that 25% of journeys made will be by public transport without a real overhaul in how public transport is provided. I agree with a lot of Jim Riach's points as well as other points about safe cycle networks linking outlying communities.</p> <p>We need to focus on single passenger journey reduction & all that requires from good broadband coverage; we might need to think about local workhubs; can we bring back car-sharing, and what about trying to have this in real-time? How might we make real-time car-sharing actually work for rural communities – because this is a solution that can deliver both on convenience and cost. Do we need to have conversations about how I might be able to get my bike on a bus to facilitate a later stage of my journey? Driverless cars are not mentioned here, nor the role of making better use of delivery services that might be able to collect my local orders – and my neighbours, and bring them out to our rural location together, using technology to do this in a truly</p>	<p>Earlier models of transport planning were predicated upon a 'predict and provide' approach to transport. This approach is now, in a sense, outdated. Our forthcoming refresh of the Local Transport Strategy will enable the Council, with its partners, to pursue options which reduce vehicles numbers and carbon whilst promoting sustainable transport options.</p> <p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.</p> <p>Comment on car sharing noted: the Council is a member of Liftshare and is working with them to explore responsible promotion of car sharing post pandemic.</p> <p>Bikes on buses: While we are looking to install bike storage at specific bus shelters/hubs in the rural areas, we will liaise with operators who operate services to assess the feasibility of allowing bikes on buses.</p>

		sustainable way. Overall this strategy is sound - but it needs a lot more creativity & willingness to explore subtlety.	
A10.4	Name provided (by email) 13 April	<p>It is difficult from this section to get an impression of the current baseline and trends, and how far those will (or will not) deliver the targets set out in the table on page 19. For example:</p> <ul style="list-style-type: none"> • Does the council have a means of monitoring transport use across the area, more widely than within the city cordon? • How many vehicles are owned by businesses or households within the area, and is there any information on the emissions emitted by them? • What influence does the Council have on bus services at the moment, and how might this change in future? <p>Notwithstanding the lack of this detail, the aim of encouraging modal shift is welcome. However, this is a very long standing aim dating back – at least - to the former Central Regional Council's 'All Change!' strategy, it would be helpful to be clear about what has been done in the past and the extent to which interventions have worked, or not.</p> <p>There also seems a significant gap in this part of the strategy in terms of reducing the need to travel in the first place, and there are two aspects to this.</p> <p>Firstly, there is much discussion at present about the 20 minute neighbourhood. There will be opportunities for the Council to help achieve this through a combination of locating its own service points in locally accessible places, and through use of the planning system to encourage developments in appropriate locations.</p> <p>Secondly, the experience of 2020 has demonstrated the potential for many office-based employees to work remotely. While this is clearly not suitable for everyone, public surveys suggest that many would welcome the opportunity to continue to work remotely for a proportion of their time, and thereby reduce travel impacts and lost commuting time.</p> <p>The Council should examine the potential to offer this option in its own operations, not least because commuting travel by staff is likely to be a much larger part of its carbon footprint than any other single source - this was certainly the case for Zero Waste Scotland, one of the Council's partner organisations, when I worked there.</p> <p>In addition, the Council should continue its work to improve broadband infrastructure across the area, especially in rural areas where BT Openreach is not planning to invest. I am a board member of Strathard Community Trust; our area is currently benefiting from this support, for which we are very grateful.</p> <p>More specifically, the strategy should reference the ban on sale of new petrol or diesel cars from 2030. As an EV owner, I welcome the Council's work to date on extending the EV charging network; however,</p>	<p>The Council has a network of traffic counters across the region and can also make use of published data from Transport Scotland's trunk roads and other national data and projections. Additional data can be collected at relevant locations for specific projects.</p> <p>Information on the number of vehicles per households in the area comes from the national level Household Survey, the Census and other sources. Car availability and mode of travel to work are given in the Demographic Profiles under the Community Council information on the Council website.</p> <p>The Council has limited influence on commercial bus services, but there are options that could be explored further, such as with contracted services where various conditions could be imposed on the operators of the services.</p> <p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas and of the active travel network. This also presents the opportunity to collect further baselines to build upon those identified in the CaNE Plan. As the pandemic has demonstrated, technology can play a critical role in reducing the need to travel unsustainably.</p> <p>The pandemic clearly impacted upon how we move from A to B. Within this context technology has demonstrated the role it can play in reducing journeys. This theme will be explored in greater detail in the Local Transport Strategy review.</p> <p>In line with Government guidance, the Council is in no rush to require all staff return to an office-based working model and is considering the most effective means of delivering a hybrid working model into the future. Depending on mode of transport and distance travelled by staff, any reduction in emissions from commuting will be counter-acted by increased emissions from the additional heating and electricity requirements from staff working from numerous homes.</p> <p>Noted</p> <p>The Council has drafted an EV Charging Infrastructure Policy and this recommends the introduction of a tariff for use at charge points. The proposed tariffs are set at rates estimated to incentivise drivers to</p>

		<p>even as an owner, I regard the provision of free electricity for charging at these points as an unjustifiable subsidy in both financial and social terms, and in sharp contrast to other stated aims in relation to fuel poverty.</p> <p>It would be far preferable to make an appropriate financial charge for use of the EV charging points, and to use the money saved to expand the number of charging points. Lack of physical access to isolated fast charging points when they are out of order or in use is a much greater concern to users on long journeys than the comparatively small cost involved.</p> <p>A further benefit of introducing a financial charge is that it would encourage EV owners to charge at home, and so free up chargers for those who need them most during their journeys. The commitment to requiring charging points installed in new housing is welcome in this respect, but if EVs are to be used at the levels proposed, much wider availability of charging points will be needed, especially in dense areas of housing. The Council should investigate this as a priority.</p>	<p>charge at home rather than the public network, yet still remain attractive to those with no means of home charging. The Policy will be presented to full Council for approval in 2021.</p> <p>Noted</p> <p>Noted</p>
A10.5	Bridget Clark (Engage Stirling platform) 25 April	<p>Need to Prioritise a Safe Integrated Cycle Network - cycling offers enormous potential in and around Stirling and helps all wheeled users and inclusion. Plan, build and sign safe cycling routes. Still waiting to draw key routes on the 2016 ATP Map Plan! People will cycle when they feel safe - we have seen that recently. Communities have been asking for many years for safe routes into Stirling; Dunblane to Bridge of Allan, Kildean (pipe bridge) and Craigforth, Gargunnoch, Cowie, Durieshill, Manor Powis.</p> <p>Needs to be much better integrated planning and delivery between SC departments and developers, and much greater awareness of councillors and officers of the issues and potential routes. So many lost opportunities to build in AT cheaply into new developments recently. Just building in car dependence. More practical action please.</p>	<p>The Council recognises these important issues and will be refreshing the Local Transport Strategy and Active Travel Action Plans to align even more closely with the objectives of the recent National Transport Strategy, as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas and of the active travel network. In addition to this we will undertake work to prepare a new Local Development Plan and will address the points raised through these processes.</p>
A10.6	Walter Attwood (by email) 29 April	<ol style="list-style-type: none"> 1. There could be an immediate saving by enforcing the bye-law at Stirling Bus Station requiring buses to have their engines turned off when stationary. It is ironic that some of the buses with running engines have large posters at their rear end exhorting drivers to turn off their vehicle's engines when stationary. 2. Encourage taxi drivers to turn off engines when waiting to pick up passengers. Examples outside the Baptist Church and train station. 3. There needs to be some thought given to having clearer signage and markings made to minimise conflict between pedestrians and cyclists. It should be clear that pedestrian have precedence where the space is being shared with cyclists. 4. See objective one for electric charging power points. 5. When creating a new Access and Core path strategy some extra thought ought to be given to those who are beginning to 	<p>Bus operators using the bus station must follow the conditions of use, which specify that vehicle engines must be switched off if at a stance for a period of time. These conditions of use are monitored by the bus station supervisors, who report any breaches.</p> <p>3 & 5. The safe interaction of pedestrians and cyclists and support for less able travellers will be considered as part of the refresh of the Local Transport Strategy and Active Travel Action Plans.</p>

		experience walking difficulties. Steps with handrails in good order would enable these people, who may have been walking all their lives continue to enjoy this activity. Two very simple examples, repairs to the handrails on the steps from the Bannockburn to Randolph Crescent and the provision of handrails on steps from Ladywell Park to Pike Road would make a huge difference. A third example would be the provision of handrails where the footpath alongside the Bannockburn crosses New Line Road.	
A11. Transport: General			
A11.1	Jim Riach (Engage Stirling platform) 11 March	There is no mention of the rural communities in this document, nor the negative impacts that visitor travel choices have on these communities, there needs to be greater emphasis on areas like the Trossachs as trip generators. Mobility hubs should be considered to provide much greater choices for integrated sustainable transport that includes car share, bike share and DRT that is safe and attractive. Much more is required in providing safe and attractive walking and cycling infrastructure that connects communities. There should be more effort in reducing the need to travel with improved local services.	The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.
A11.2	Steven Hampson (by email) 10 March	After enquiring about dropping the kerb in front of my house to create access for an electric vehicle, it transpires that the answer is no. Despite a large number of my neighbours doing so, I can't because the front of my house is designated a 'lay-by' - indeed it is a widening in the road where we park currently (and no one else does). However, I'm still at a loss to see the difference in me creating off street parking and hence effectively 'booking' a part of the public highway for my own use, with the lady around the corner doing the same thing but not adjacent to a 'lay-by', which IS allowed. Is denying me the ability to home-charge an electric vehicle under a traffic rule that appears to make little sense the sort of 'enabling' of council residents that the plan promises? Does it demonstrate a mind-set that prioritises the climate emergency, challenges current thinking, unleashes potential? No, it means I keep my petrol car until the charging network expands significantly (chargers in Bannockburn = 0).	The inspector rejected the application as "dropping the kerb in that location would have a knock-on effect on the ability of other residents to park in the layby area" Email update received 13 April: <i>...there are now four 7.5kW EV chargers at Bannockburn High School. When I wrote my comments there were none. They're weak, and so will only be of use to teaching staff but they are there, so my comments are a little out of date now. Great to see progress I suppose!</i>
A11.3	Steven Hampson (Engage Stirling platform) 15 March	Need to finally link together cycling infrastructure between the city and the eastern villages. The distances involved would encourage cycling (2 to 4 miles) if it were not for the need to encounter busy roads with poor pavements (A9 Falkirk Road for example). Can we take the opportunity to promote cycling to/from these villages to Stirling by connecting them all with safe routes, especially in the cases of Cowie and Plean, where the A9 has effectively annexed cyclists and pedestrians because no safe crossings are available from the M9 junction all the way to Springkerse, where Fallin's cycle route passes underneath.	The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.
A11.4	Pat Morrissey (Engage Stirling platform)	It is wonderful to see the council aiming to reduce greenhouse gas emissions. However, insisting on building the Viewforth Link Road brings this commitment into question.	The Council has paused any further work on the link road and will be re-examining the case for it as part of the refresh of the Local Transport Strategy.

	18 March		
A11.5	Matt Francis (Engage Stirling platform) 30 March	The improvements to the cycle network set out in the recent walk, cycle live consultation are welcome. However, beyond the routes in question and the increased segregation there also needs to be a commitment to gritting and maintaining off-road routes throughout the winter months. Only then will residents have the confidence to make a permanent modal shift to cycling from private cars and vehicles.	The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.
A11.6	Susan Dyer (Engage Stirling platform) 8 April	I commend the Council in its achievements so far but there needs to be more radical action. We need a city centre that is wholly pedestrian, walking and cycle friendly and well served by eco-friendly public transport.	The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas and a review of the of the active travel network.
A11.7	Dorothy (Live Event) 8 April	How will you tackle rural transport?	<i>Answer provided during the Live Event:</i> Thank you for your question. We presently have a Demand Responsive Rural transport system which is well used, but we know we can do more and be better. We are presently looking at options through the Bus Partnership Fund to improve rural transport links. Further to this we will focus in on this in the next Local Transport Strategy to consider how this can be improved through public transport, active travel and Mobility as a Service options. We will engage with our communities to shape this round their needs.
A11.8	Dorothy (Live Event) 8 April	Are DRT vehicles electric?	This will be actioned through the target on page 19 to convert taxis to EVs.
A11.9	Anonymous (Live Event) 14 April	In the transport strategy there seems to be a focus on the switch towards electric vehicles, but will the housing and services infrastructure develop in a way to reduce the need for private vehicle transport? Are the interesting initiatives such as 20 minute neighbourhoods, etc been considered?	We will be refreshing the Local Transport Strategy over the next year looking at how we can learn from schemes like 20 minute neighbourhoods and the growing emphasis on place-making.
A11.10	Naomi Ross (by email following 2 nd Live Event) 14 April	It was touched on towards the end of the presentation that improved public transport would be given higher priority than I had initially thought. I'm glad to hear this because so far most of what I've heard has related to improving active travel (great in the Summer, much less so the rest of the year) and encouraging EV use. Although EV use is a clear benefit, most experts cite use of efficient public transport as being a much more effective way of reducing our planetary impact, so again I'd strongly welcome any move to improve public transport use.	Noted
A11.12	'Out in the sticks' (Live Event) 20 April	As you force ICE vehicles from Stirling itself - at what point will you extend the operating hours of the Park and Ride Facilities?	As part of the refresh of the Local Transport Strategy we will also be looking at the Public Transport Strategy which will cover opening times of park & ride. We are also in a parallel project looking at other possible sites for park & ride/park & choose
A11.13	Anonymous (Live Event) 20 April	There seems to be little focus on transformative planning to create sustainable communities with planning for housing areas with poor public and active travel links and do not reflect the changing demographic. Will Stirling be aligning with SG plans for 20 minute communities?	<i>Answer provided during the Live Event:</i> Yes, we are looking at all the options we can utilise to reduce the need to use cars and to encourage walking, wheeling and cycling for everyday journeys. This will include a refresh of the Local Transport Strategy and looking at the interdependencies of planning and

			transport. In October 2021 the Council will set out programmes to take forward a new Local Transport Strategy and Local Development Plan which will explore the detail of issues such as this.
A11.14	Anonymous (Live Event) 20 April	The Walk, Live, Cycle project does not seem to be addressing some of the key barrier areas like the Craigs roundabout. Cars are still preferred with things like split crossings and underpasses for pedestrians and cyclists which put people off active travel.	<i>Answer provided during the Live Event:</i> Walk, Cycle, Live Stirling is working on two particular routes: to the university and to the college. The City Centre South programme, which we are hoping to launch in the summer, will look at how to encourage and enable walking, wheeling and cycling in a wider area south of the city centre, including at Craig's roundabout. Some people prefer subways as being out of the way of traffic but as you identify many people don't like them. We need to look at all the options to make active travel the preferred option.
A11.15	Clare Andrews (Live Event) 20 April	Interesting that you mentioned distance being important for travel behavioural choices. Number one priority on transport should surely be to 'avoid' journeys where possible (as well as 'shift' to greener travel options or 'improve' emissions of transport), for example by local provision of services close to housing --How would this be incorporated into e.g. overarching planning policy?	<i>Answer provided during the Live Event:</i> We want to help everyone avoid unnecessary carbon-heavy travel, especially for everyday journeys. Things like 20 minute neighbourhoods where services are closer to hand and greater emphasis on place-making as well as enabling safer and fun active travel will help. But people will still need and want to travel beyond their own neighbourhoods and we need to work with them on the best low carbon options for this - be it public transport, EVs, car sharing or cycling on a strategic network. We need to make sure there are lots of low carbon options for all the different journeys we make.
A11.16	'Out in the sticks' (Live Event) 20 April	You took delivery of a huge number of White Vauxhall ICE cars recently. Why did you not show leadership by adding EVs to your fleet now?	This year our electric fleet will be expanded with the addition of a further 65 electric vehicles. A larger choice of electric vehicles with greater driving ranges entering the market will facilitate our fleet replacement programme in the coming years.
A11.17	'Out in the sticks' (Live Event) 20 April	Will you begin to permit in-pavement EV chargers outside residential houses?	Electric car drivers wishing to install their own private charger are required to do so on their own land. Public chargers installed by the Council on Council-owned land or adopted roads are not allocated to specific properties. The Council is introducing more public chargers across the area and we are exploring a number of locations and technologies for future on-street installs to assist those with no access to charging at home.
A11.18	Clare Andrews (Live Event) 20 April	Any plans for encouraging shared EV ownership rather than individual ownership model, for example affordable car-share schemes?	A new car club for Stirling was introduced in 2020 and includes access to electric vehicles. Unfortunately this was launched just as lockdown began. Going forward we will continue to work with car club providers to promote greater use and encourage expansion to other localities.
A11.19	'Out in the sticks' (Live Event) 20 April	What balance are you striking between reduced journeys and 'simple upkeep of roads'? The roads are in a state and killing ALL vehicles - the thought of ruining an expensive EV on Stirling's Rural Road network is a complete turn-off. They may last longer if on a smooth motorway but it's just not financially sustainable for many vehicle owners.	As part of the refresh of the Local transport Strategy we will be looking again at the Roads and Maintenance Plan. Climate change and the increase in severe weather events will have an effect on roads making any existing problems worse so we need to look at how we tackle that with the resources we have available. Flood protection and flood alleviation are important and the Council is working on those too.
A11.20	'Out in the sticks' (Live Event) 20 April	Minimising the need to move about means more houses near Stirling and fewer in the far-flung villages. We in the villages are happy to see that happening. A house near Stirling will always be 'greener' than a house in the sticks PLUS the 2 or 3 EVs that will be needed by those that live there. Discuss... ;-)	The Council will be undertaking a review of both its Local Transport Strategy and Local Development Plan which enable the Council in partnership with the community to set the development framework to progress this.

A11.21	Anonymous (Live Event) 20 April	Can the Council encourage private providers such as supermarkets to add new EV charging stations to the national Chargeplace Scotland network, rather than fragmenting provision as has happened in England?	When encouraging the introduction of EV charge points by private providers, such as supermarkets and housing associations, the Council recommends the national CPS network, but can only make recommendations. The decision on which charging network is installed rests with the individual provider. In some cases this is a decision taken at a corporate level by a head office based elsewhere.
A11.22	Raj Burgul (by email) 21 April	<p>I read with interest your climate and nature emergency plan. I am a consultant hospital doctor at Forth Valley Royal Hospital working in the area for 20 years. Like thousands of colleagues I travel from the Stirling area to Larbert and back again every day. I see many of the cars have single occupants. I have tried my best to cycle to work but there is no safe route that follows the A9.</p> <p>In 2018 while cycling to work I was hit by a car from behind and knocked off my bike on the B9124 between Stirling and Cowie and fractured my right arm. I actually made it into work on time but in an ambulance! Speaking to colleagues there is a strong feeling that many would cycle to work but are fearful. My arguments to convince colleagues that it was relatively safe were negated by my accident. Cycling North-South in the Stirling area is simply too risky.</p> <p>The simple act of creating a cycle lane alongside the A9 between Larbert and Bannockburn would largely solve this problem. I urge you to improve cycling in the Stirling area and target this particular route. This would not only promote cycling locally, it would attract cyclists from other areas to visit.</p> <p>I remember taking part in a consultation for a 3m cycle path alongside the A9 to Bannockburn a number of years ago and I'm unaware of the outcome.</p>	<p>A feasibility study was carried out by the regional transport body in 2019 to investigate potential walking and cycling routes to connect Stirling with Plean and Larbert. A prioritised phased approach was suggested.</p> <p>As a first step, the Council is working on a number of schemes which would link to a Stirling to Larbert route, including active travel improvements from north of Borestone to Stirling City Centre in the City Centre South programme, a feasibility study for a green corridor on Glasgow Road and routes in Bannockburn, and changes to the Greencornhills and Greenyards roundabouts to include walking and cycling access. We have also worked with Falkirk Council on a feasibility study of a route from Stirling to Denny.</p> <p>The Council is about to begin a refresh of the Local Transport Strategy to incorporate Climate Emergency commitments and changes in travel priorities and patterns. The increasing popularity of electric bikes means we will need to consider how we can also best support those longer distance journeys.</p>
A11.23	Alan Paton (Engage Stirling platform) 29 April	I live in an area that has no connecting footpath, cycle lane or even public transport from the village nearby. Our ONLY option is to use a private vehicle. Pedestrianisation of Stirling city centre would be beneficial, but a series of safe footpaths linking villages to villages and restoring previously existing public transport would be life changing.	The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas.
A11.24	Name provided (by email) 2 May	<p>I've had a brief read through the above plan, particularly with regard to transport. I found it quite disappointing.</p> <p>Firstly with regard to active travel. Cycling in particular - there needs to be a massive expansion of safe (separated) cycle paths if we are to make the dramatic difference required. Stirling is extremely poor in this regard. As an example it is not possible to cycle to the city from the West without using the dangerous A811 - this situation will be repeated across the whole of Stirlingshire I'm sure. There is an old railway that could be adopted to link with other paths in the West Stirlingshire villages, or perhaps we need to look at building cycleways on all of our main roads. Costly of course but it is an emergency. The condition of our local roads</p>	The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the plan for Towns, Villages and Rural Areas and of the active travel network.

		<p>is also a deterrent to cycling - many are so poorly maintained that they are dangerous to cyclists.</p> <p>Public transport - again a step change is needed and I will use a local example again - the Balfron to Stirling bus service is really bad - the buses are worn out, leaky and cold, they run infrequently and the prices for this service are unrealistic for many. Rather than improving these services as implied by the plan the recent past has seen a rationalisation! There will be no public uptake unless things change very dramatically - say a comfortable, affordable bus running every 15 minutes to come close to the attraction of the car. Again this might be considered unrealistic but the level of ambition needs to reflect the problem. I'd support the idea of a council owned public transport company but it needs major funding to be transformative.</p> <p>Freight on the roads - not much about this in the plan but it significantly affects our roads and local environment, and discourages active travel. The council could encourage movement of freight to rail with local facilities to exchange from rail to local electric delivery carriers. There is far too much long distance HGV use to be compatible with net-zero. The Scottish Government have a part to play here but the council can think about this with much more ambition and lobby the government too.</p> <p>Electric car charging - a small number of chargers have been installed but many are not rapid chargers - they should be 50Kw minimum but generally 100Kw or more. There also needs to be many, many more and also not seen as a revenue raising source for councils or placed in chargeable car parks - there is an emerging trend of councils putting costs on these chargers that don't represent good value for money - for those without their own chargers this could become a deterrent to electric car take-up.</p> <p>Thank you for consideration of my comments.</p>	<p>The majority of bus services in the Stirling area are operated on a commercial basis: the Council has reported the concerns regarding vehicle quality back to them.</p> <p>The Council is drafting a Public Transport Strategy where these points will be considered further.</p> <p>Noted</p> <p>We continue to work with Transport Scotland and Electric Vehicle Association Scotland to install the optimum mix of slow, fast and rapid chargers across our communities. In many instances where users are leaving their vehicles for long periods, rapid chargers are not appropriate. However on key routes they are critical for those charging mid journey. Any charging tariffs introduced will be set at a level that allows the Council to recover operating and maintenance costs whilst still remaining financially attractive to those with no means of home charging.</p>
A11.25	<p>Claire Ritchie (Engage Stirling platform) 3 May</p>	<p>I live in St Ninian's/Torbrea and I always try to think about the more environmentally friendly options ie active travel/public transport before using a private vehicle but it's not easy at the moment and it needs to be easier so people can make the change.</p> <p>Although there has been work done to develop safe cycle routes we need car free cycle routes. If there was a car free cycle route to town I would have used it from the time my children were young. I have found cycling on the current route with children way too stressful and have always had to choose to walk instead which takes up more time. A car free cycle route out along the A811 to Gargunnoch and beyond would make cycling a lot easier and safer and I think it could help develop tourism in the council area. Imagine if there was a car free route all the way out west to the national park.</p>	<p>The City Centre South programme, launching in June 2021, will improve active travel from these areas to the city centre.</p> <p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the Active Travel Network.</p>

		<p>I think local motorists need to be educated about vehicle idling as I often see drivers running their engines outside the school or at Lidl. It is so frustrating when I am trying to limit using a private vehicle to see other motorists creating emissions going nowhere.</p> <p>I feel the Peak is too far to walk or cycle from St Ninians / Torbrex, especially with children, and I have looked into using the bus but it takes two buses to do the journey. We need bus routes where people can make the journey they want to make on one bus. Buses are also expensive. In my experience it is cheaper and easier to get a taxi to get home from the train station than to use a bus if I have my children with me. Buses need to be the cheaper option in comparison to private cars and taxis if people are going to use them.</p> <p>I think we will have to be really ambitious if we really want people to switch from private vehicles to public transport and active travel. I think it would be worth it not just in terms of the climate crisis but also in terms of public health benefits from increased exercise.</p>	<p>Noted</p> <p>The Council is drafting a Public Transport Strategy where these points will be considered further to make buses an attractive alternative to the private car.</p> <p>Noted</p>
A11.26	<p>Michael Tortolano (Engage Stirling platform) 3 May</p>	<p>Your goals here, whilst laudable, seem to be diametrically opposed to the council's actions with the reopening of Murrayshall Quarry. This will put between 110 to 220 extra HGV journeys carrying rock on the roads heading across many children's school routes crossing Polmaise Road from Cambusbarron, Kenningknowes, Batterflats, and Dalmorglen Park and then going past Kings Park. Many parents will be forced to get back into the car as a result of safety concerns and children being intimidated by these vehicles passing.</p>	<p>This relates to a recent planning application to create a new access track into Murrayshall Quarry on Gillies Hill which was refused by the planning authority at the planning committee. The appellant obtained planning permission via an appeal to the Scottish Government Planning & Environmental Appeals Decision: https://www.dpea.scotland.gov.uk/CaseDetails.aspx?ID=121261</p> <p>Planning permission has been in place to quarry at Murrayshall for decades and recently the operator of the eastern section of the quarry obtained planning permission, via the appeal, to access that section of the quarry. It is likely that this permission will be implemented by Patersons Quarries Ltd.</p> <p>Having already taken a decision to refuse the planning application for an access track, the planning authority is not in a position to resist/deter Patersons Quarries Ltd implementing their permission.</p>
A11.27	<p>FEL (by email) 3 May</p>	<ul style="list-style-type: none"> • For us, the key question this plan should be addressing (and is underpinned by issues identified above) is a rebalancing in the need to travel; how we move around; and how we work post Covid. • The plan still prioritises vehicles over people and doesn't reference the sustainable transport hierarchy e.g. priority of increasing EV taxi licences, perhaps actions could be prioritised in line with the transport hierarchy? • The plan puts too much prominence on e-vehicles, for fleet/staff (before active and sustainable travel or not travelling at all) and for residents – does this represent a just transition, how accessible are these to the majority of Council residents? • We would like to see the Council leading by reviewing staff need to travel and prioritising walking and cycling for all, not simply the electrification of the fleet. 	<p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the Active Travel Network.</p>

		<ul style="list-style-type: none"> We would like to see more cycle parking in favour of car parking- alongside more Ebike charging points. Forth Environment Link not Stirling Active Travel Hub introduced a regional public ebikeshare pilot programme, there were over 9000 journeys regionally. We would like to see more prominence to making streets more accessible to users with disabilities Rural communities – there is clear relationships between rural communities and Stirling for services and employment, however day to day needs should be met locally to reduce the need to travel. We would like to see a commitment to meaningful green routes/freeways, particularly connecting rural communities. We would encourage all new housing developments to be located and/or connected to good active and sustainable transport infrastructure, public transport links and incorporate bike share. We would like to see how transport plans will improve resident’s health and wellbeing. 	<p>Noted and text edited accordingly.</p> <p>Officers are looking at all the options we can utilise to reduce the need to use cars and to encourage walking, wheeling and cycling for everyday journeys.</p>
A11.28	Riverside Community Council (by email) 3 May	<p>Riverside Community Council is a supporter of active travel, sustainable transport and infrastructure improvements to make it easier to journey safely without a car. We feel community consultation and engagement is essential to achieve these goals.</p> <p>It has been our experience that when businesses and commercial properties make sustainable choices there can be an adverse consequence to the local communities. In Riverside we have become the parking area for commuters and for buildings with no on- site parking.</p> <p>Residents have raised the issue that electric vehicles have lesser known negative environmental impact and that being fully educated on this would allow people to make informed choices.</p> <p>Charging points for electric cars are currently insufficient for an increase in electric car use. People may have to make the choice to convert gardens into driveways to get access to power, and this is less than ideal environmentally.</p>	<p>Noted</p> <p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include consultation with communities.</p> <p>Noted</p> <p>The Council is keen to explore new innovate car charging technologies that make the most of the existing electrical capacity, such as lamp post chargers, as well as renewable energy in order to meet the demand for more charging provision.</p>
A11.29	University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May	<ul style="list-style-type: none"> Better cycle lanes But not just in Stirling itself, need better cycle lane links to surrounding towns/villages too What is the “Behaviour Change Strategy”? This strategy needs to be based on evidence Some focus on major walking routes to schools is needed to improve the experience of walking to school, alongside health benefits of e.g. lower pollution 	<p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the Active Travel Network.</p>
A11.30	Benjamin Fisher	<p>Safe cycle lanes in more rural areas are of benefit to the communities and also encouraging tourism. The A811 from buchlyvie to stirling needs a</p>	<p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change</p>

	(Engage Stirling platform) 4 May	cycle lane, the topography would encourage more cycle users especially the rise of electric bike use.	concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the Active Travel Network.
A11.31	Transition Stirling membership (by email and Engage Stirling platform) 4 May	<p>* We feel that there should have been more about active travel which almost seems like an afterthought in the plan, and found it frustrating that it concentrates so much on electric vehicles. Public transport should also have been more of priority than the 6th bullet point. Although EV use is a clear benefit, most experts cite use of efficient public transport as being a much more effective way of reducing our planetary impact. Everyone having an electric vehicle won't solve the problem, especially due to the environmental impact of their production.</p> <p>* Members suggested park and rides for outlying villages and better use of existing park and rides.</p> <p>* There were suggestions of cycle networks to some places. The target of 30% for active travel seems too small and it was felt that it should have been more clear and bold about what Stirling Council wanted to achieve with active travel. There should be more sites and sites should be more secure for parking bikes for free. For example, the train station requires a lot more.</p> <p>* Increasing the cost of car parking permits for second cars year on year for residents was a suggestion.</p> <p>* The cost of public transport is currently too high and availability needs improved. There was a suggestion of flat fees for transport to make it more affordable and convenient.</p> <p>* In order to reduce the amount of journeys taken there should be more support for local communities to have the services required without needing to go to other areas. One suggestion was working hubs for people to work in so that they do not need to commute but can work away from home and meet others in their community.</p> <p>* As there has been a lot of investment recently for active travel and spaces for people, it is also important to invest in rural communities and link the different towns with active travel routes and public transport to reduce the use of cars.</p>	<p>The refresh of the Local Transport Strategy and Active Travel Action Plans will align even more closely with the objectives of the recent National Transport Strategy as well as addressing climate change concerns and the longer term effects on travel of the COVID pandemic. This will include a review of the Active Travel Network.</p> <p>We are looking at all the options we can utilise to reduce the need to use cars and to encourage walking, wheeling and cycling for everyday journeys.</p> <p>The Council is drafting a Public Transport Strategy where these points will be considered further to make buses an attractive alternative to the private car.</p> <p>The refresh of the Local Transport Strategy will include a review of the transport plan for Towns, Villages and Rural Areas.</p>
Resource Efficiency			
A12. Resource Efficiency: Priorities			
A13. Resource Efficiency: Targets			
A14. Resource Efficiency: Actions			
A14.1	David Mitchell (by email) 23 March	Resource efficiency has significant potential for sustainable economic activity through the circular economy. As a large purchaser of goods and services the Council has significant leverage to deliver local benefits - e.g.	The Circular Economy action plan will recognise the significant role the Council has to play in the local circular economy, including procurement policies and practices, re-use of assets, and the handling of wastes.

		<ul style="list-style-type: none"> • Small scale dimensioned building stone sources are significant across Stirling area - required to repair existing built assets and also potential to use for new. Streetscape works should not be using high carbon, unethical stone from China or India - often produced with poor environmental and labour controls - https://www.stonefed.org.uk/index.php?page=blog • With the right planning and procurement approach locally sourced materials provide local employment and low carbon materials of known provenance which can be accessed in the future - the granite in town centre is Chinese, laid by Portuguese workers and is likely now non traceable for repair. • Procurement should not be seen as an obstacle to sustainable purchasing but it requires effort. • Added value resourcing such as the Raploch Training Initiative gives better outcomes per pound than 'normal' contracting. • Design and specification of Council housing and other built assets need reviewed from ground up. • Recycling and re-purposing could be enabled by the Council at its waste facilities directly with residents and avoid landfill. • Energy from waste project is highly innovative and should be reproduced elsewhere. • Better support the third sector to deliver resource efficiency than Council attempting to. • Council should enact policies to focus on adaptation of existing built assets over new build. This could promote re-population of town centre as the retail transition continues to shift. Demolition should be last resort for all projects - public or private. 	
A14.2	Rachel Nunn (by email) 12 April	<p>Clearly the new UK Right to Repair legislation that requires all electrical goods to be able to be repaired and so prolong their lifespan by 10years is helpful to this objective. Again, some creativity could be brought in by the council to speed things up: rate relief for repair shops and clear signposting to, and intuitive siting for such activities so that it is completely obvious they are there. The council can help by promoting this legislation; it could work with local education providers to put on 'DIY repair' classes for students, whilst the rest of us pore over You Tube videos of how to fix our stuff now that we can get the parts. The council can use communications – at schools, in places of waiting (hairdressers, GP surgeries etc) to change our collective mindset that 'newer / bigger / faster' is better...to 'repair' or 'own for longer' or 'rent' is better.</p> <p>Vis the last; the 'rent' instead of 'own ' era is on its way in...what could the council do to attract this business model into Stirling more quickly and meaningfully?</p> <p>Largely therefore, in addition to ensuring the recycling infrastructure, our strategy needs business development within the council to be at the cutting edge of market innovations which reduce resource consumption,</p>	Support for the local Share & Repair economy will be included in the Circular Economy Plan and the Circular Economy Business Support Partnership will work with the local business community to promote these new business models.

		<p>supporting them to thrive here and communicating to the public using every possible avenue, to adopt them. There may need to be a stick that dis-incentivises ‘throw away’ culture, & I recognise this is tricky with fly-tipping. This emphasises that the cost efficiencies of a new resource efficiency model need to stack up...what role can local government take here and how can we collectively encourage the UK Gov needs to implement a carbon tax?</p> <p>I agree entirely with the points made by Steven Hampson regarding the bins...and this emphasises my earlier points about carbon literacy and systems thinking.</p>	
<p>A14.3</p>	<p>Name provided (by email) 13 April</p>	<p>This section would benefit from more background information – carbon impacts from resources we use are largely unrecorded if those impacts take place in other countries. Although the Scottish Government records these impacts (https://nationalperformance.gov.scot/carbon-footprint), they are not yet generally used in discussion about emissions.</p> <p>Given the partnership with Zero Waste Scotland, there should be an opportunity here for Stirling Council to explore this in more detail, and to propose actions accordingly, in line with moves to a wider circular economy.</p> <p>More immediately on the information presented, Stirling recycling rates are higher than the Scottish Average, which is great and worth highlighting. However, there is minimal information on levels of commercial and industrial waste produced and treated in Stirling, which seems a very large gap.</p> <p>The forthcoming introduction of the Deposit Return Scheme should help increase rates further. Living in a rural area where littering, particularly from used drinks containers, is a constant problem, I am hoping and expecting that DRS will also result in a significant reduction littering in the area – or at the very least, will ensure that communities clearing litter will have access to some financial compensation from returned unclaimed deposits. It would be helpful to mention the Council’s approach to this scheme and predicted impacts.</p> <p>It would be helpful to provide more information on what actually happens to waste collected for recycling, particularly plastics? Media coverage over the last year suggests that much of this ends up either polluting oceans, or is burnt in uncontrolled conditions in developing countries. While I am not a fan of energy from waste plants, I’d see incineration in or near Stirling as a less bad option if those are the real world alternatives and there is no immediate prospect of change.</p>	<p>Noted</p> <p>Zero Waste Scotland is a key stakeholder and we will continue to work with them to identify the most appropriate actions to reduce the greatest carbon impacts.</p> <p>Comment on Commercial and Industrial waste noted and the inclusion of SEPA-derived data on Stirling’s business waste will be considered for inclusion in the Circular Economy Plan, however there is a lag of 2-3years. Most recent published data was 2018. We will work with ZWS & SEPA to establish the most appropriate means of reporting and monitoring C&I waste.</p> <p>Scotland’s national Deposit Return Scheme *(DRS) has been modelled off similar schemes operating across the world and is an example of an Extended Producer Responsibility Scheme, where producers and consumers, rather than Councils, pay for the cost of putting products on the market and recovering them for recycling after use. The Council has undertaken disposal modelling with Zero Waste Scotland ahead of the planned for introduction of Scotland’s DRS in 2022/23. The national DRS has been modelled with the expectation of capturing between 70-90% of all drinks containers, once fully bedded in. Other recyclable materials will still be required to be collected at the kerbside and not included in the DRS including, plastic pots/tubs/trays, plastic milk bottles, food cans and food/beverage cartons. Based on disposals modelling the Council is aware of the likely impact to kerbside materials volumes and how this will impact collection routes. As part of the Council’s Waste Transformation Programme, blue bins will shift from a fortnightly collection to a 4-weekly collection. Additional routing efficiencies will be implemented following the bedding in of the DRS. The Council currently pays per tonne for mixed recycling material to be sorted at a Materials Recovery Facility. With the more valuable materials (e.g., PET drinks bottles, aluminium cans) being largely</p>

		<p>More widely, it would be helpful for the Council to commit to strengthening its procurement approach to clearly and strongly reflect all sustainability criteria, to help build the market for low carbon, recycled and remanufactured goods.</p> <p>In relation to food, it is consistent with both carbon and health aims that we reduce the proportion of meat in our diets. As above, the Council should use its procurement approach to help drive this – Zero Waste Scotland events which include catering have been exclusively vegetarian for some years, for example.</p> <p>Finally, it would be helpful to avoid any further changes to waste collection for a while after the current set have been implemented!</p>	<p>removed from the blue bin material mix, this will likely result in less value being extracted from the mix, which may increase the treatment cost per tonne which the Council will pay in future, however, the volume of material will also be reduced.</p> <p>As part of the Waste Transformation Programme, the Waste Service is in the process of recruiting additional officers to undertake communications and public engagement activities. The Waste Service is working towards producing and publishing engaging media content, which will demonstrate the recycling journey clearly and in a transparent way across kerbside waste streams. The Council is committed to transparency of service delivery and respects the need to secure the trust and buy-in of our residents to ensure their full engagement in local recycling services, particularly in light of increased concerns being raised off the back of the Blue Planet effect and similar awareness raising programs.</p> <p>Council procurement practices, including catering, will form a key component of the Circular Economy plan.</p>
A14.4	Naomi Ross (by email following 2 nd Live Event) 14 April	<p>The Resource Efficiency side of things touched on behaviour change towards sustainable purchasing, but didn't mention anything about improving participation in the sharing economy. Stirling has a leader in this area with the council, charities and informal groups working on things like car sharing, tool libraries, plant swap groups etc. But more can and should be done to encourage both creation of businesses in this area and participation by local residents. The economic potential of the sharing economy is significant and it would be a great way to encourage sustainable behaviours whilst also creating jobs and other social benefits (Amsterdam case study here: https://www.ellenmacarthurfoundation.org/case-studies/shaping-a-sharing-economy-that-works).</p>	<p>The sharing economy will be included in the Circular Economy Plan.</p>
A14.5	Anonymous (Live Event) 20 April	<p>Any plans for a Remakery or similar initiative for workshops for citizens to repair items instead of buying new?</p>	<p><i>Answer provided during the Live Event:</i> We are working with our 3rd Sector partners to expand their Share & Repair projects, including Reuse Hubs to divert items from landfill.</p>
A14.6	Name provided (by email) 28 April	<ol style="list-style-type: none"> 1. Single use plastics: A large number of single use plastic rubbish sacks still being used by the council. Supermarkets and other retail outlets still have single use plastic bin-liners on sale. Can alternatives be urgently found? 2. It is not necessary for household waste to be put into plastic sacks or bin-liners before being put into grey bins. Could a large label be stuck on each grey bin urging home owners to stop using them.? 3. Too much food is wrapped/packaged in single use plastic. Cutting back on this source of pollution should be urgently addressed. 	<p>Eliminating the use of avoidable single-use plastics is an action for the Council within the CaNE plan.</p> <p>Although the use of bin liners is optional, this would be considered a personal choice for residents based on their own household set-up. For many residents, the ability to line a kitchen bin to keep the bin clean, the waste contained and to empty the bin less frequently if less able-bodied, would be preferable. During high wind events, we would encourage residents to ensure their waste is fully contained, to ensure waste material does not escape to surrounding areas. In addition, during frequent windy and severe weather, waste containment is important to avoid flyaway material during bin emptying operations.</p>

		<ol style="list-style-type: none"> 4. How do Stirling Council dispose of their plastic waster. Is it sent to be reused? How much? Is any of it sent overseas? How much? Any sent for incineration? How much? Reports on local authority plastic disposal of waste, not necessarily Stirling Council, being found dumped overseas or being burnt is undermining confidence in the whole recycling process and could well prove very damaging to the council's reputation as a recycler. 5. A walk down almost any street on bin collection day and bins can be seen to contaminated by unsorted waste. Plastics in Green bins, cardboard in blue bins. There would seem to be more education required of the public into how to use the recycling bins. 6. Bins often have reusable supermarket shopping bags filled with rubbish in wheelie bins on collection day. Obviously the higher charge for these bags is not a deterrent against them being used as single use disposable bags! 7. Persuade supermarkets, as the major source of single use plastic to urgently review their own operations and pay for public education material. 8. I learnt more about the thinking behind the change of use of brown bins from a Freedom of Information request than from all the reporting in the Stirling Observer and council website. 9. Food waste is still far too high. "Buy one get one free" offers encourages over buying and has the real potential of moving much food waste from shops to homes. 	<p>Finally, at present, waste material presented in a grey bin is sent to a landfill for disposal. Waste that isn't contained within a liner is more likely to become windblown across the site and require additional measures for wider containment.</p> <p>Plastic bottles, pots, tubs and trays presented in a blue recycling bin are at present sent for sorting and treatment at a Materials Recovery Facility in East Lothian. There are no outlets locally, nationally or internationally for the reuse of this type of material. Only the non-recoverable fraction of mixed recycling is sent for disposal to Energy from Waste (incineration) after all target and recyclable materials have been extracted as far as reasonably possible from the sorting process.</p> <p>The Council reports on waste material type and tonnage to the Scottish Environment Protection Agency (SEPA) through formal Waste Data Flow reporting, which includes next destination reporting. All Materials Recovery Facilities in the UK must then report the downstream treatment outlets for the materials they sort and send to market to either SEPA in Scotland or DEFRA in England. Materials Recovery Facilities are not currently required in legislation to provide to Councils the next destination materials are sold on to, however, the Council's incumbent contractor provides monthly detailed reports on this. The UK Environment Agencies are currently working on an enhanced system of reporting which seeks to achieve an improved audit trail of final destination reporting. At a future point it is possible that with full traceability on complex material commodity chains, Council recycling rates will be based on the end outlet and not on the next destination. Recycled materials are tradeable resources and end markets depend on where in the world manufacturing centres demand recycled product to remanufacture into the new products that we potentially import, buy and consume.</p> <p>As part of the Waste Transformation Programme, the Waste Service is in the process of recruiting additional officers to undertake communications and public engagement activities. The Council is committed to supporting our residents with waste and resource education to ensure maximum participation in services. Future public engagement will extend to producing video journeys, social media engagement, attending local schools, presenting to community groups, being present at key public events and one-to-one household support.</p>
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A15. Resource Efficiency: General

A15.1	Steven Hampson	I am a resident with no connection to the council through family, employment or community council. My two most recent experiences	
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	(by email) 10 March	with the council on environmental matters have been disappointing. I tried to raise the fact via my local councillors that charging money to dispose of garden waste will result in more domestic trips to waste & recycling facilities, without a corresponding reduction in waste lorry trips because they are obliged to pick up food waste from the very same bin that the garden waste can no longer be added to - thus increasing CO2 emissions, contrary to the top priority identified in the councils own survey of its residents and to the obligations to the government with respect to the Climate Change Act. My local councillors promptly passed my message on to the council over three weeks ago - no response. Besides, this decision will be going ahead in April. So personally, I have a £35 bill from the council to ensure I MAINTAIN their carbon emissions with respect to my household at current levels. So I will pay it.	Email update received 13 April: <i>... the council has now replied to me regarding garden waste charges</i>
A15.2	Steven Hampson (Engage Stirling platform) 12 March	How does charging for a garden waste permit, which will increase domestic trips to recycling centres while not reducing council pick-ups, align with reducing emissions? It's contrary to these ideas. Far better to increase council tax and ring fence for waste efficiency improvements. No extra admin, no extra journeys. Great to have a plan but unsound actions now are creating problems now. How much time do you think we have?	The introduction of the garden waste permit will allow the Council to continue to deliver an important recycling service to residents at a time of severe financial pressures. It is also part of the Council's wider waste transformation programme which aims to: <ul style="list-style-type: none"> • Reduce waste to landfill and increase recycling rates to meet national targets; and • Reduce the costs of providing our household waste service. The changes include grey bins (general waste) moving to four-weekly from two-weekly collections later this year. This will encourage a necessary shift in the culture of waste disposal, increasing the amount of household waste placed in recycling bins, including food and garden waste. A brown bin without a permit will still be collected if it contains food waste only. Residents with access to transport can bring their garden waste to any of our three HWRC's (tips) free of charge. Households can also participate in home composting.
A15.3	Niall Hamilton Smith (Engage Stirling platform) 16 March	This is probably one of the weakest areas across the wider plan which otherwise has lots of admirable aspirations and some innovative ideas for action. However, all our actions locally need to pull in the same direction and the substance of the local development plan, with unwarranted levels of greenfield house building and sprawling commercial development on the city's periphery directly cut across any meaningful attempt to increase resource efficiency. The LDP is an 'old school' economic vision of growth through greater resource extraction. This needs to be more explicitly addressed in this strategy, and the LDP, and many of the assumptions that underpin it (including outdated demographic projections), need to be reviewed.	The current LDP was adopted in October 2018 and represents the Council's view on how the area should be developed to 2027. It was subject to extensive public consultation and takes account of a wide range of publications and views including National Planning Framework 3 (NPF3), Scottish Planning Policy, the Council's City Development Framework, other Council strategies such as the Local Housing Strategy and Economic Strategy. Overall it promotes a sustainable pattern of development and appropriate and efficient use of resources, including making best use of urban and brownfield land in sustainable locations. To accommodate sustainable growth of the area the Plan's spatial strategy does allocate a range of greenfield sites for future development, that said the Plan's policies and spatial strategy are also the basis to resist continuing pressures for non-conforming development on non-allocated greenfield land. Emerging national planning policy and guidance advocates the rebalancing of the planning system so that climate change is a guiding

			<p>principle for all plans and decisions. The NPF 4 Position Statement includes a range of Key opportunities to achieve this, for example:- Building 20 minute neighbourhoods; Introducing a stronger preference for reusing existing buildings before new development proceeds; Shifting future development away from greenfield land including by actively enabling the redevelopment of vacant and derelict land; Strengthening support for development in town centres and restricting out-of-town retail and leisure to help transition away from car-dependent developments towards those that enable walking, cycling, wheeling and public transport accessibility.</p> <p>These will inform the preparation of the forthcoming LDP that, in turn, will be informed by an evidence report which will include up to date information on the size, composition, health and distribution of the population.</p>
A15.4	Susan Dyer (Engage Stirling platform) 8 April	Pleased to see that there is an intention to adopt a circular economy. Agree with Steven Hampson's comments, particularly about how much time we have. There needs to be more radical action on waste reduction, drastic action on use of plastics and recycling.	Noted
A15.5	Luci (Live Event) 8 April	<p>I appreciate your steep challenges you have set the councils recycling aims, I just wonder from the domestic point of view, how can things be improved in terms of clear guidance in what households can recycle, and what percentage of the "blue bin" are actually recycled. Business recycling could also be massively improved, is this covered in your plan too?</p> <p>I'd also like to suggest as a promotional tool moving forward with your plan, that Stirling Council somehow do a "follow your recycling" informative video or similar to encourage and inform those of us who recycle our domestic waste as much as possible</p>	<p><i>Answer provided during the Live Event:</i></p> <p>We will work with colleagues in waste services and our partners Zero Waste Scotland to ensure we have up to date & effective recycling guidance for households.</p> <p>We are also engaging with local business via Go Forth BID and Forth Valley Chamber of Commerce to assist businesses in their recycling practice.</p>
A15.6	Luci (Live Event) 8 April	Supporting community resilience can overlap with the choices we all make with regards to consumer demand in terms of local products/ recycled materials/sustainable products - there are a number of local projects where I am in West Rural Stirlingshire that would benefit from council support such as zero waste food shop, community run food exchanges, grow garden etc - how can they benefit from the Council's plans?	Supporting local communities on waste and resources projects will form a key component of the Circular Economy Plan. The Council-funded Community Fridge project has proven to be a success in its first year and there are valuable lessons to be learnt from that initiative.
A15.7	Ana (Live Event) 14 April	Will the limitation of non-essential single-use plastics be applied to all supermarkets? Or is it a local initiative for businesses (cafes, restaurants, pubs, ...)?	<p><i>Answer provided during the Live Event:</i></p> <p>The Council is limited in its influence on national supermarkets however we have developed a working group which includes Forth Valley Chamber of Commerce and Go Forth BID, this group will support more local initiatives to tackle single use plastics. For example, prior to Covid, Stirling had been selected to pilot a city-wide coffee cup deposit scheme.</p>
A15.8	'Out in the sticks' (Live Event) 20 April	My daughter lives near a Supermarket who offer a deposit return scheme and she gets paid for what I give to Stirling Council in my Blue Bin. When these schemes are widespread then your waste collection	Scotland's planned for national Deposit Return Scheme (DRS) has been modelled off similar schemes operating across the world and is an example of an Extended Producer Responsibility Scheme, where producers and consumers, rather than Councils, pay for the cost of

		stream will dry-up. Does this leave a financial hole that needs to be plugged?	<p>putting products on the market and recovering them for recycling after use. The Council has undertaken disposal modelling with Zero Waste Scotland ahead of the planned for introduction of Scotland's DRS in 2022/23. The national DRS has been modelled with the expectation of capturing between 70-90% of all drinks containers, once fully bedded in. Other recyclable materials will still be required to be collected at the kerbside not included in the DRS including, plastic pots/tubs/trays, plastic milk bottles, food cans and food/beverage cartons. Based on the disposals modelling the Council is aware of the likely impact to kerbside materials volumes and how this will impact collection routes. As part of the Council's Waste Transformation Programme, blue bins will shift from a fortnightly collection to a 4-weekly collection. Additional routing efficiencies will be implemented following the bedding in of the DRS. The Council currently pays per tonne for mixed recycling material to be sorted at a Materials Recovery Facility. With the more valuable materials (e.g., PET drinks bottles, aluminium cans) being largely removed from the blue bin material mix, this will likely result in less value being extracted from the mix, which may increase the treatment cost per tonne which the Council will pay in future. The volume of material collected will however also be reduced.</p>
A15.9	Clare Andrews (Live Event) 20 April	As well as new public drinking water points, could local businesses perhaps be given incentive to join the existing national Refill network? (similar to some Councils incentivise public use of toilets)	<p><i>Answer provided during the Live Event:</i></p> <p>The Council hopes to work with local businesses to encourage a range of refill/reuse initiatives. Prior to lockdown we were due to take part in a Zero Waste Scotland plastic reduction initiative by piloting a coffee cup deposit scheme, similar to the successful Freiberg project.</p>
A15.10	Clare Andrews (Live Event) 20 April	On the topic of waste, is it possible for residents to use the Household Waste & Recycling centres without a car to access them (even for small loads that it is possible to transport this way)?	<p>Household Waste Recycling Centres across Scotland have unfortunately been operationally designed for safe access by vehicles. Both Callander and Polmaise Recycling Centres adjoin operational depots where large heavy operational vehicles and plant equipment are present, which makes shared pedestrian and vehicle access challenging from a safety perspective. Due to the way that infrastructure has been built, particularly at Polmaise Recycling Centre, and also as the facility is out of the way of footfall, it would likely be impractical to propose modifications to layout that could include pedestrian access.</p> <p>In terms of improving pedestrian access to enhanced recycling facilities for materials that cannot be recycled at the kerbside and with local access in mind, the Service would be open to exploring enhancing Recycling Point infrastructure where sites and space are available to do so. The Scottish Government has just launched a £70m national recycling infrastructure fund and with your feedback in mind, I will speak with my team about the potential to explore options on this front, in consultation with our communities.</p>
A15.11	Louise Waters (Engage Stirling platform)	Much as I like the 'Lead, Enable, Inspire' model on which the Plan is built, I believe the response to the climate emergency also requires 'Enforce' to the extent that the Council's powers allow. Some residents	As part of the Waste Transformation Program, the Waste Service is in the process of recruiting for additional officers to undertake communications and public engagement activities. This will include

	3 May	refuse to recycle their waste despite the Council making it very easy for them to do so. (I live in the City Centre where many households use purple bags rather than wheelie bins. The bags are quite see-through so I know exactly what kinds of things my neighbours are throwing away, despite 24/7 recycling receptacles being located less than 100 metres away.) It would be great if we could 'inspire' everyone to do the right thing but I don't think that it is possible without there also being a threat of consequences for repeatedly doing the wrong, anti-social thing. There is certainly also a role for gentle/patient education to help residents to avoid suffering those consequences from unintentional behaviour/actions.	providing community and household level support for the change to frequency of grey bin landfill waste collections. The Waste Transformation Program is focused on increasing recycling rates, while delivering an affordable waste service.
A15.12	FEL (by email) 3 May	<ul style="list-style-type: none"> • There is a disconnect with some of the specificity within this sector and the more generic ambitions within the rest of the themes. • We believe this is an area where green growth could be enhanced and the Council could lead on the development of resource networks. It is also an area where, during covid, the community support networks have stepped up and redirected thousands of tonnes of end of life food to feed residents in need; not recognising in doing so they are contributing to climate action or recording the data in the process. • We would like to see how resource efficiency plans will improve resident's health and wellbeing. 	<p>Noted</p> <p>This will be picked up in the Circular Economy Plan.</p> <p>This will be picked up in the Circular Economy Plan.</p>
A15.13	Riverside Community Council (by email) 3 May	It is important to recognise that it is expensive to consistently choose sustainable options, charities, community groups and average households may find this prohibitive when making choices on limited budgets. Options and information will be key to supporting these groups. One of our concerns with resource efficiency is that non-digital communication could suffer and those without access to the online media lose out on opportunities and information as a result. This can often be vulnerable groups.	<p>Noted</p> <p>Noted</p>
A15.14	HES (via SEA Gateway) 4 May	A significant proportion of Stirling's buildings and infrastructure are traditional or historic. The maintenance and retention of these structures, along with bringing under or disused buildings back into sustainable use, can play a key part in Stirling's Circular Economy and reduction of waste, as well as having wide ranging benefits for people's wellbeing. In view of this, we recommend that you consider how the draft Plan can place increased emphasis on achieving resource efficiency through effective asset management. This is important for both Council assets, and those belonging to others. We would expect that the strategies underpinning this objective would include the Council's Asset Management Strategy.	Noted – this will be picked up in the Circular Economy Plan
A15.15	University of Stirling Biological & Environmental Science Students (Engage Stirling platform)	<ul style="list-style-type: none"> • Really need more infrastructure to buy local (affordable) refill food/other consumables rather than constantly buying in new packets as Stirling has no such facilities for this. • Engage community – e.g. no signs on food waste bins in Stirling saying what the waste will be used to make (I think it goes to AD for biogas) I don't think many people know what their food waste goes towards. 	<p>Noted</p> <p>Mixed food and garden waste collected in brown bins at the kerbside is sent for industrial In-vessel composting at an organics treatment facility in Glenfarg Perthshire, where airflow and temperature controls are used to turn this material into farm grade compost over a period of</p>

		food at home? Again, community engagement is key here to understand the barriers associated with these types of initiatives	This is picked up in the Council's Community Food Growing Strategy .
A15.16	Transition Stirling membership (by email and Engage Stirling platform) 4 May	<p>* We were grateful for the mention of our community fridge project (Stirling Community Food) and Share and Repair.</p> <p>* The Resource Efficiency side of things touched on behaviour change towards sustainable purchasing, but didn't mention anything about improving participation in the sharing economy. Stirling is a leader in this area with the council, charities and informal groups working on things like car sharing, tool libraries, plant swap groups etc. But more can and should be done to encourage both creation of businesses in this area and participation by local residents. The economic potential of the sharing economy is significant and it would be a great way to encourage sustainable behaviours whilst also creating jobs and other social benefits (Amsterdam case study here: https://www.ellenmacarthurfoundation.org/case-studies/shaping-a-sharing-economy-that-works).</p> <p>* It discusses household waste but there is concern that the introduction of the tax for brown bins is going to result in increased landfill from those unwilling or unable to pay the cost of uplift who will put their garden waste in their grey bin.</p> <p>* We would like more information on the "how" here: How will you reduce the waste from your offices and operations? How will you reduce the need for single use items? How will you support local third sector groups to access funding?</p> <p>* It mentions that Stirling Council will explore the opportunities for developing a local reuse and repair centre. This was confusing as it is already in progress, with a MOU in place. Transition Stirling has regular meetings with the recycling centre management team, to keep updated with the lockdown release. The other obstacle has been securing the right premises for the Reuse Hub. We look forward to increased support from Stirling Council in that regard. At the request of the council, increased funding has been secured through ZWS. However, time is of key importance as the funding period expires in Dec 2022.</p>	<p>Noted</p> <p>Support for the local Sharing economy will be included in the Circular Economy plan and the Circular Economy Business Support Partnership will work with local business community to promote these new business models.</p> <p>The decision to introduce a £35 garden waste permit charge was approved at a meeting of Full Council on 30 June 2020. The introduction of the garden waste permit will allow the Council to continue to deliver an important recycling service to residents at a time of severe financial pressures. It is also part of the Council's wider waste transformation programme which aims to:</p> <ul style="list-style-type: none"> •Reduce waste to landfill and increase recycling rates to meet national targets. •Reduce the costs of providing our household waste service. <p>The changes include grey bins (general waste) moving to four-weekly from two-weekly collections later this year. This will encourage a necessary shift in the culture of waste disposal, increasing the amount of household waste placed in recycling bins, including food and garden waste.</p> <p>A brown bin without a permit will still be collected if it contains food waste only. Residents with access to transport can bring their garden waste to any of our three HWRC's (tips) free of charge. Households can also participate in home composting. The introduction of the garden waste permit will allow the Council to continue to deliver an important recycling service to residents at a time of severe financial pressures.</p> <p>We will continue to work with the 3rd sector to progress the work already undertaken around a Reuse Hub and identify opportunities for further hubs handling other material streams and/or in other locations.</p>

Nature and Biodiversity

A16. Nature & Biodiversity: Priorities

A16.1	Green Action trust (by email) 23 April	GAT is fully supportive of all the priorities listed under this objective.	Noted
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A17. Nature & Biodiversity: Targets

A17.1	Tom Palmer (Engage Stirling platform) 29 March	<p>The plan for tree planting is impressive but it must not be a numbers game - the right tree in the right place is essential and at least 50% of the planting should be native broad leaf. Commercial forestry does not, in the long term, contribute to carbon reduction.</p> <p>Given the multiplier value of peat as a carbon store, consideration should be given to affording shallow peat the same protection as deep peat. To truly maximise the carbon absorption potential of our natural environment, targets should be set for the restoration of blanket bog which are at least as challenging as the targets for tree planting.</p>	<p>Tree planting is a key element of the Climate & Nature Emergency Plan as well as the Council's Alive with Nature Plan, which will be out for consultation later in 2021. Both these plans also seek to secure benefits for biodiversity. The Council will therefore be taking measures to ensure that we do not negatively impact on biodiversity through our tree planting targets. We are working with partners to identify the best areas to undertake tree planting. These will include areas that enable us to enhance and better connect existing areas of native woodland and locations that can help to alleviate flooding or provide increased opportunities for recreation and engagement.</p> <p>The protection of our peatlands will form a key element of our move to net zero. We will work with partners to maximise the area of active peatland that will act as a carbon sink.</p>
A17.2	Anonymous (Live Event) 14 April	<p>How are 1m trees related to residual carbon emissions? Will 1m trees achieve net zero? Is there a calculation behind this headline figure?</p> <p>Will the council protect peat bogs by banning the use of peat or sale of peat for horticulture?</p>	<p><i>Answer provided during the Live Event:</i></p> <p>The protection of our peatlands will form a key element of our move to net zero. We will work with partners and the commercial sector to minimise the amount of peat that is extracted and maximise the area of active peatland that will act as a carbon sink. The figure of 1 million trees is based on a basic calculation using an average figure for the amount of carbon sequestered by broadleaved tree species that are native to Scotland. The amount of carbon sequestered by 1 million trees will enable us to achieve our net zero target by absorbing the residual carbon that we expect to emit. We are currently working with partners to develop a more accurate method for measuring the amount of carbon sequestered by our natural environment, not just our trees and woodlands. This methodology, when finalised, and our carbon calculations for our natural environment will be made publicly available.</p>
A17.3	Paul Dumbleton (Engage Stirling platform) 20 April	<p>It would be reassuring to see more detail, especially to see the rationale for the targets and the means by which they will be achieved. For example, why two trees for every person by 2025 and not three or one tree per person? What is meant by 'managing for biodiversity'?</p> <p>There are lots of individuals and groups which would love to see this plan succeed but will need not just more detail but information, advice, guidance and resources. This is an emergency! Let's get the details and resources sorted out.</p>	<p>The targets have been selected to fulfil a wide range of objectives. The Plan contains an overall tree planting target of 1 million trees. Using a basic calculation 1 million trees will enable us to achieve our net zero target. Within this overall tree planting target are other sub-targets including a target to plant 2 trees for every resident. This target does not have a scientific basis, it was chosen as a promotional target that we hope will motivate everyone to contribute.</p>
A17.4	TreeLink Stirling (Engage Stirling platform) 20 April	<p>1. TreeLink Stirling welcomes Stirling Council's draft plan to address the climate and nature emergency which was declared in 2019. TreeLink is a voluntary organisation that has been formed in response to the emergency facing the planet (www.treelinkstirling.org). It is particularly concerned with the need to protect and promote trees and woodlands and this response to the plan is limited to commenting on Section 4 which addresses the 'nature' emergency.</p> <p>2. TreeLink finds it hard to respond in any detail as the plan itself is not detailed. We look forward to the publication of Alive With Nature, which may fill this gap. We also look forward to having sight of the Pollinator Strategy referred to in the plan, and to the opportunity to comment on the draft Tree & Woodland Policy which was discussed by the Housing &</p>	<p>1. Noted. The need to protect and expand our trees and woodlands is reflected in the Plan with targets for a net increase in the number trees planted.</p> <p>2. The Climate & Nature Emergency Plan is a strategic document. More detail will be provided within the Alive with Nature Plan. The Council's Pollinator Strategy and Tree & Woodland Policy will be released for public consultation later this year.</p>

	<p>Environment Committee on 3rd December 2020 but is yet to be made available for consultation. Where detail is available in this report, for example the target for planting 180,000 trees by 2025, there is a lack of explanation of the rationale for the numbers and timescale. We also recommend that as well as the target number of trees, there is some thought given to targets for canopy cover, especially in built-up areas. Targets such as managing 50% of open space for biodiversity seem arbitrary. Has any work been carried to determine what percentage of amenity grassland could be managed to support greater biodiversity? Are particular models of management for biodiversity being considered? TreeLink suggests that protecting existing trees and woodland should have a higher profile, since they have such an important role in supporting biodiversity, keeping carbon locked up and ongoing carbon sequestration. The target of increasing Local Nature Conservation Sites is very welcome, but assessing how much woodland with high nature conservation value is present and committing to protecting all good examples (based on agreed criteria) would be more beneficial than aiming for a specific number of protected sites. Working with landowners to encourage good management would also be an important step, since LNCS status only has a bearing on planning decisions, not management.</p> <p>3. TreeLink welcomes an ambitious tree planting target but has concerns on the implied reliance on schools and community groups to meet this target. It welcomes the learning opportunities that this involvement could bring but is very aware of the current lack of capacity to manage such projects in most schools and many community groups. TreeLink suggests that to achieve a community based mass tree planting target and to maximise its potential benefits a strategy should be developed which:</p> <ul style="list-style-type: none"> • Ensures that 'the right trees are planted in the right places'. Trees are not necessarily appropriate in all places and different species and mixes of species will thrive in different places. This requires that there is expert information and advice available to the schools and groups which plan, plant and maintain the trees. TreeLink would like to see a presumption for native trees of high nature conservation value/ trees matched to existing ecological conditions unless there is a strong argument to use non-native species (e.g. environmental conditions, suitability based on future climate predictions). A commitment to responsible sourcing would also be welcome, using only nursery stock of local or at least Scottish origin and provenance, to ensure they don't dilute the environmental adaptations of local trees or risk introducing disease. • Ensures that the overall benefit of planting 180,000 trees is maximised by developing a strategy for trees and woodlands across wider areas - for example to develop wildlife corridors between existing woodlands. This requires oversight of the planting programme rather than simply offering trees to schools and community groups. An assessment should be made of proposed planting sites to ensure tree planting will not 	<p>The Alive with Nature Plan includes a target for increasing the tree canopy cover within our settlements. The Plan also includes a commitment to audit all Council open space to determine the changes that are possible and the benefits that will result.</p> <p>Designating LNCS is an important step in protecting our local biodiversity. Many potential LNCS contain areas of high value woodland. We will work with landowners to encourage the implementation of land management that will benefit biodiversity and help mitigate our carbon emissions.</p> <p>3. Noted. Priority B04 states that there will be opportunities for all stakeholders, including schools, to contribute and deliver action. The language chosen indicates an opportunity to take part rather than a reliance on delivery.</p> <p>Agreed. The Council is committed to working with partners to develop a land use strategy that will guide our tree planting and woodland creation. This will help to ensure that trees are planted in suitable locations and that we increase the connectivity of our habitat network. The land use strategy will also look to identify opportunities for the creation of wildflower rich habitats within a wider habitat network.</p> <p>We will favour native trees of local provenance where this is appropriate. Within urban settings there may be situations where non-native trees are the most appropriate tree and provide the most biodiversity and climate benefits.</p> <p>Agreed.</p>
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	<p>damage existing habitats of conservation value and that tree cover is the best choice in comparison to other habitat types. Thought should go into developing shrub and ground layer vegetation to provide biodiverse habitats rather than just trees. Additionally wildflower rich grassland habitats adjacent to woodland or surrounding widely spaced trees (i.e. wood meadow) would provide enormous complementary biodiversity benefits, particularly for invertebrates. Species-rich meadow stores significantly more carbon in soil compared to species poor amenity grassland</p> <ul style="list-style-type: none"> • Considers planting in places which are not easily accessible to schools and community groups. 'Street Trees' and trees on verges and small public spaces give disproportionately greater benefits but cannot be planted by community groups and schools without the active involvement of Council staff and resources. A firm commitment to protecting and planting street trees would be of great value. If no commitment is made it is likely that few if any street trees will be planted to meet the 180,000 target. • Ensures that any planting includes a maintenance plan and budget and has provision to monitor maintenance. Trees are a long-term investment and require a long-term plan for their care. <p>4. TreeLink is also concerned that the current stock of trees and woodlands are well managed. As well as a target for new planting TreeLink suggests that Stirling Council makes a clear commitment to the care and maintenance of existing trees and woodland. This has implications across the Council including the planning department. This could include systematically assessing which trees/areas should be covered by Tree Protection Orders, reviewing management of Council woods, working with landowners to ensure that Local Nature Conservation Sites are well managed and using planning policy and decision making to protect existing woodland and to increase tree cover. Ancient woodland stores significantly more carbon and supports greater bio-diversity than new plantations.</p> <p>5. Overall TreeLink suggests that Stirling Council adopts a strategic approach to the management and development of trees and woodlands in its area. This is not a small task, but is essential if the aims of the Climate and Nature Emergency plan are to be met. This issue faces local authorities across the world and many are affiliating to the United Nations Tree Cities of the World programme. Authorities that are affiliated to the programme commit to five standards:</p> <ol style="list-style-type: none"> 1. To have a written statement on the care of trees with responsibility given to a designated staff member. 2. To have a written policy establishing standards of care for trees. 3. To keep an inventory of trees to support long term planting and replacement. 4. To dedicate a budget to tree maintenance and planting. 	<p>Street trees and trees within urban parks will form an important part of the Alive with Nature Plan and the Pollinator Strategy.</p> <p>4. The management of Council-owned trees and woodlands will be included in the Council's Tree & Woodland Policy. Within the CaNE Plan there is a commitment from the Council's Planning Service to ensure that our planning policy makes the maximum contribution to the Plan's targets.</p> <p>5. See above comment regarding the land use strategy.</p> <p>The principles promoted through the UN Tree Cities of the World Programme fit with those included in the draft Stirling Council Tree & Woodland Policy which is due for public consultation later in 2021.</p>
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A17.5	Anonymous (Live Event) 20 April	Tree planting is fine as part of plan, but how are you going to ensure you don't plant on Scottish Biodiversity List priority habitats?	<p><i>Answer provided during the Live Event:</i></p> <p>Tree planting is a key element of the Climate & Nature Emergency Plan as well as the Council's Alive with Nature Plan, which will be out for consultation later in 2021. Both these plans also seek to secure benefits for biodiversity and include other priorities, including actions for increasing the areas of wildflower rich grasslands. The Council will therefore be taking measures to ensure that we do not negatively impact on biodiversity through our tree planting targets. We are working with partners to identify the best areas to undertake tree planting. These will include areas that enable us to enhance and better connect existing areas of native woodland and locations that can help to alleviate flooding or provide increased opportunities for recreation and engagement.</p>
A18. Nature & Biodiversity: Actions			
A18.1	Liz Albert (by email) 23 March	<p>A - I would like to see a higher emphasis of the role of farming in making significant improvements regarding protection and enhancement for biodiversity. This is the main land use in Stirling Council and is the one focused on least. There is a huge range of potential actions that farmers can choose from, and there is the Nature-Friendly Farming Network that they can join (no cost) for advice and support. There are influential farmers in the area already doing a good job, eg Argaty Estate who can demonstrate it can be successful.</p> <p>Ideas for farmers include:</p> <ol style="list-style-type: none"> 1. Creating ponds in less productive wet areas of their land 2. Changing the management of their hedges and remnant hedges to allow them to flourish as shrubs within edge, producing flowers in spring for pollinators, food for insects/ birds/ small mammals in autumn and winter. Their hedges can then provide good connectivity too. Trim only in late winter. See here for good information: https://www.wildlifetrusts.org/how-manage-hedgerow-wildlife 3. Reducing their inputs by growing their own winter feed like turnip tops, by minimising use of fertiliser instead using manure whenever possible, and by reducing their use of herbicides and pesticides, especially avoiding any containing neonicotinoids, as these last ones are those which are most damaging to biodiversity as they persist for a long time in air, in water, and in soils. 	<p>We are already engaging with partners, including landowner representative organisations, to discuss the changes that we need to make to our land management to achieve our zero carbon target and secure benefits for biodiversity. We will establish a landowner forum to encourage these changes and to share examples delivered by others, including those within the Nature Friendly Farming Network.</p>

		<ol style="list-style-type: none"> 4. Managing their grasslands with biodiversity in mind as well as their crops, by leaving unsprayed corners, removing cattle from fields used by skylarks and other ground nesting birds in nesting season, and so on. 5. Considering Agroforestry schemes to diversify the habitats on their land and aid their income too. 	
A18.2	Name provided (by email) 25 March	<p>Farming Emphasise the role of farming and landowners in making significant improvements regarding protection for and enhancement of biodiversity. Farmland occupies a significant area in Stirling Council but is the one focused on least. There are many options farmers can choose to contribute, and there is the Nature-Friendly Farming Network that they can join (no cost) for advice and support. An example of a successful operation is Argaty Estate. Possible interventions:</p> <ol style="list-style-type: none"> 1. Create ponds in less productive wet areas of their land 2. Change management of hedges and remnant hedges to allow them to flourish thus producing flowers in spring for pollinators, food and fruit for insects/ birds/ small mammals in autumn and winter. Hedges can then provide good connectivity too:- increasingly important as climate change necessitates migration of species to other areas. Trim only in late winter. See here for good information: https://www.wildlifetrusts.org/how-manage-hedgerow-wildlife 3. Reduce inputs by growing winter feed like turnip tops, minimising use of fertiliser by instead using manure whenever possible (heeding nitrogen input guidelines), and by reducing their use of herbicides and pesticides, especially avoiding any containing neonicotinoids (most damaging to biodiversity as they persist for a long time in air, in water, and in soils). Rotational grazing allows grasslands to recover (carbon sequestration) and provide food reducing the necessity to buy in feed. 4. Manage grasslands with biodiversity in mind as well as their crops, by leaving unsprayed corners, removing cattle from fields used by skylarks and other ground nesting birds in nesting season, and so on. This should lead to reduced requirement for pesticides. 5. No-till arable preserves soil structure. 6. Consider Agroforestry schemes to diversify the habitats and income source but with beneficial species e.g. deciduous rather than blanket conifer. 	<p>We are already engaging with partners, including landowner representative organisations, to discuss the changes that we need to make to our land management to achieve our zero carbon target and secure benefits for biodiversity. We will establish a landowner forum to encourage these changes and to share examples delivered by others, including those within the Nature Friendly Farming Network.</p>
A18.3	Liz Albert (by email) 23 March	<p>B - Regarding woodlands, remember that woodlands are not just the trees. Woodlands of broadleaves should include woodland glades large enough to be sunny and sheltered, for butterflies and other invertebrates. Woodland ground flora - bluebells, wood anemones, wood sorrel and so on, are important too, as are the fungi within the wood. Deadwood, both lying and standing deadwood is a really</p>	<p>Our intention is to create woodlands that will encourage all the natural attendant biodiversity and that will form part of a wider integrated habitat network.</p>

		important element of woodlands too, crucially important for many invertebrates which in turn are food for birds. Woodlands also need to be managed , not just left to themselves. So funding for future management should be included in costings.	
A18.4	Name provided (by email) 25 March	Woodlands Regarding woodlands, remember that woodlands are not just the trees. Woodlands of broadleaves should include woodland glades large enough to be sunny and sheltered, for butterflies and other invertebrates. Woodland ground flora - bluebells, wood anemones, wood sorrel and so on, are important too, as are the fungi within the wood (mycorrhizae). Deadwood, both lying and standing, is a really important element of woodlands too, crucially important for many invertebrates which in turn are food for birds. Woodlands also need to be managed, not just left to themselves. So funding for future management should be included in costings.	Our intention is to create woodlands that will encourage all the natural attendant biodiversity and that will form part of a wider integrated habitat network.
A18.5	Liz Albert (by email) 23 March	C Peatland is an important habitat in itself, as well as its value for carbon capture. It holds specialist plants and many specialist invertebrates as well as other species groups. Stirling holds peat in areas other than Wester Moss, for example on the Gargunnoch Hills and Fintry Hills and in some parts of Sheriffmuir. It would be valuable for biodiversity to aim, with landowner partners, to restore any degraded peatland for its biodiversity value, as well as for carbon capture, so getting double value from the work. Advise landowners of public funds that can be applied for to support peatland restoration work. https://www.nature.scot/climate-change/nature-based-solutions/peatland-action-project An important point is that it is not only Deep Peat currently defined as over 50cm deep that is valuable. It would be really useful to change Stirling Council's definition of Deep Peat to peat over 30cm depth, or even to anything over 25cm depth. This is still thousands of years worth of peat formation, and captures carbon just as well as less deep peat. The Scottish Government is reviewing their definition of Deep Peat currently with a view to lower depths being regarded as Deep, and DEFRA in England is changing their definition of Deep Peat to over 40cm, so the definition is on the move already.	The protection of our peatlands will form a key element of our move to net zero. We will work with partners and landowners to maximise the area of active peatland that will act as a carbon sink.
A18.6	Name provided (by email) 25 March	Peatland This is an important habitat in itself, as well as its value for carbon capture. It holds specialist plants and many specialist invertebrates as well as other species groups. Stirling peat reserves are found in areas other than Wester Moss, for example on the Gargunnoch and Fintry Hills and in some parts of Sheriffmuir / the Ochils. It would be valuable for biodiversity to aim, with landowner partners, to restore any degraded peatland for its biodiversity value, as well as for carbon capture, so getting double value from the work. Advise landowners of public funds available to support peatland restoration work. https://www.nature.scot/climate-change/nature-based-solutions/peatland-action-project	The protection of our peatlands will form a key element of our move to net zero. We will work with partners and landowners to maximise the area of active peatland that will act as a carbon sink.

		An important point is that it is not only Deep Peat currently defined as over 50cm deep that is valuable. It would be really useful to change Stirling Council's definition of Deep Peat to peat over 30cm depth, or even to anything over 25cm depth. This is still thousands of years' worth of peat formation, and captures carbon just as well as less deep peat. The Scottish Government is reviewing their definition of Deep Peat currently with a view to lower depths being regarded as Deep, and DEFRA in England is changing their definition of Deep Peat to over 40cm, so the definition is on the move already.	
A18.7	Liz Albert (by email) 23 March	D Invasive Non-Native Species. This topic is really important for our native biodiversity too. Your idea of a Landowners Forum would be a good place for this topic to be aired with a view to far greater responsibility being accepted by a range of landowners, both public and private, to tackle the adverse effect of INNS on Scotland's biodiversity. I'm aware the law in this is not as helpful as some of us would like. But it really is an important issue for all landowners to act on. The longer it is left unmanaged, the more expensive it gets to deal with it.	Agreed. Reducing the impact of invasive non-native species is an element of the draft Alive with Nature Plan which is due for consultation later in 2021.
A18.8	Name provided (by email) 25 March	Invasive Non-Native Species (INNS) This topic is really important for our native biodiversity too. Your idea of a Landowners Forum would be a good place for this topic to be aired with a view to far greater responsibility being accepted by a range of landowners, both public and private, to tackle the adverse effect of INNS on Scotland's biodiversity. The law regarding INNS may not be as helpful as some would like. But it really is an important issue for all landowners to act on. The longer it is left unmanaged, the more expensive it gets to deal with. Consider funding.	Agreed. Reducing the impact of invasive non-native species is an element of the draft Alive with Nature Plan which is due for consultation later in 2021.
A18.9	David Mitchell (by email) 23 March	<ul style="list-style-type: none"> Biodiversity in an urban environment could be greatly improved which would also deliver improved amenity - food production - some good work here top of town. There should be a presumption of re-use and brown field development enacted through policies to ensure protection of more natural environment. Council should commit to reforestation of long term mixed woodland - a city forest? Look at enhancing biodiversity in areas with potential - Gowanhill, river corridor, Kings Park, Abbey Craig etc. Return Kings Park to the woodland it once was to the benefit of many rather than a few golfers? 	<p>Agreed. Increasing urban biodiversity is a key element of the draft Alive with Nature Plan, which is due out for consultation later in 2021.</p> <p>Some brown field sites are valuable for biodiversity and recreation, for example Fallin bing. Development of brown field sites will be considered where relevant.</p> <p>Increasing the number of trees within our urban areas is an action within this Plan and a key element of the draft Alive with Nature Plan. Some of our urban green spaces contain valuable habitats or have high amenity or historical value. Our tree planting programme will have due regard for these areas.</p>
A18.10	Rachel Nunn (by email) 12 April	<p>I agree entirely with all the comments by Tom Palmer and unfortunately also with the comment by Pat Morrissey.</p> <p>This strategy should have almost 100% focus on landowners in our area: what role is the council going to take (with the NFU for example) to help farmers:</p> <ul style="list-style-type: none"> reduce methane from livestock: reduce nitrous oxide from fertilisers 	The Council is already engaging with partners, including landowner representative organisations, to discuss the changes that we need to make to our land management to achieve our zero carbon target and secure benefits for biodiversity. We will establish a landowner forum to encourage these changes and to share examples delivered by others, including those within the Nature Friendly Farming Network.

		<ul style="list-style-type: none"> - reduce CO2 leak from tilling and convert to silvopasture or no-till techniques - reduce emissions from machinery - reduce pesticides and herbicides <p>Each of the above (& there are no doubt others – such as fish-farming impacts in our area) needs to be SMART: we need to assess what the current status is, and negotiate a reduction plan.</p> <p>Stirling Council (& presumably Stirling University) can work with supermarkets to highlight at any one time which foods are most sustainable – and highlight which foods really are not...for instance – rice grown in paddy fields is HUGELY unsustainable, winter tomatoes grown in a heated greenhouse are less sustainable than imported ones from south Spain...but in winter, tinned tomatoes are best... So whilst I agree with a local food theme – it’s not always particularly helpful.</p> <p>Consumers will drive the change in sustainable consumption – but they have to be given knowledge at the right place and time to do this – and the council could show amazing leadership (like Iceland has done) – and drive this at a local level.</p> <p>As part of the above, the council could team up with supermarket partners to publish an annual report, with local supermarkets of how Stirling diets are becoming more sustainable - and this report should be communicated far and wide. This provides an opportunity to set real targets. Clearly a UK carbon tax would sort all of this automatically...</p> <p>On a tangent, Stirling council could show ingenuity and leadership by resuming its supply of compost into the Stirling market. We should be driving consumers towards peat-free compost – which this is, and which most other compost from almost all other local providers, is not. By actively enabling and encouraging householders to switch, pressure will be put on B&Q, Dobbies etc to do the right thing and drop their peat-compost suppliers.</p>	<p>Agreed.</p> <p>The Council has limited influence on supermarkets but has developed a business working group, which includes Forth Valley Chamber of Commerce and Go Forth BID. This group will support more local initiatives and the suggestion for sustainable labelling in local stores will be fed into discussions.</p> <p>Agreed</p> <p>Noted</p> <p>The Council has limited influence on supermarkets but has developed a business working group, which includes Forth Valley Chamber of Commerce and Go Forth BID, where these issues can be discussed.</p> <p>Waste Services are continuing to monitor the situation week by week based on industry and Scottish Government advice, and will reinstate compost supply as soon as we’re operationally able to do so. Our Recycling Centre sites have experienced unprecedented demand over the last year due to lockdown restrictions meaning more residents are spending the majority of their time at home or in their gardens. Unfortunately the areas where we are able to supply free compost from our sites would have added to challenging site congestion across this period. The supply of the bulk compost to the Council is built in as a committed Community Benefit offering from our contractor Enva, who uplifts and industrially composts the green waste brought to our recycling centre sites. Access to green waste-derived compost from Callander and Polmaise Recycling Centre is - during the lifetime of the current green waste recycling contract - a service that the Council commits to provide.</p>
A18.11	Name provided (by email) 13 April	The actions here within the Council’s remit seem sensible. Overall, though, the Council’s influence on land use is very limited compared to that of farming and forestry, and actors in those sectors will be strongly influenced by available subsidies.	Agreed. Reference to the value of the proposed Landowner Forum is noted and welcomed.

		Current subsidy regimes continue actions under the Common Agricultural Policy and while debates are ongoing on replacement, it seems very likely that considerably less money will be available. Given the very large proportion of the Council area which is rural, it would be helpful for the Council to develop a position – ideally with the proposed landowner forum – on how to best support land use activities to reduce carbon impacts while maintaining productive use and employment. The approach should make links to other plan areas here, particularly in relation to biofuels, changing patterns of food demand, and land management to help improve visitor and resident access and climate adaptation.	
A18.12	Anonymous (Live Event) 14 April	Regarding the ambitious tree planting programme, has the planting of street trees and the improvement of existing urban areas also been considered?	<i>Answer provided during the Live Event:</i> We recognise the multiple benefits that street trees provide and are working with all the key stakeholders, within the Council and our partners, to increase the tree canopy across our urban areas. This will include the planting of street trees as well as increasing the number of trees in our public parks and private gardens.
A18.13	Green Action Trust (by email) 23 April	<ul style="list-style-type: none"> • In addition to the actions listed, we would welcome reference to GI/nature based climate solutions being included in planning guidance. • GAT is well placed to provide support to Stirling Council in the development/delivery/monitoring & evaluation of actions set out under the Lead/Enable/Inspire cross cutting themes and would welcome the opportunity to discuss this in more detail. • The Blueprint referenced above would be a useful tool for identifying projects with the greatest potential for increasing habitat connectivity and wider ecological coherence. 	The Fourth National Planning Framework Position Statement (November 2020) states the national spatial strategy will further explore nature-based solutions to climate change, including tree planting and peatland protection and restoration, which also protect and restore biodiversity and deliver wider benefits. The preparation of the forthcoming replacement LDP will take full account of these changes in the local spatial strategy and supporting policies.
A18.14	Name provided (by email) 29 April	<ol style="list-style-type: none"> 1. Before much can be done on this area of concern a much more comprehensive idea of what already exists must be determined. There would appear to be no accurate record of species, birds, mammals, insects, flowers, trees, fungi in the Stirling area held anywhere. A council led initiative to get local people to pool their observations, by ward or even smaller area, would provide a better basis for planning in this field. 2. The above comment does not preclude action being taken now to improve our natural habitat. Litter is a major problem in many areas and not just the major tourist attractions. Litter is not only unsightly but can be a danger to wildlife. Local places blighted by litter in my locality include the Bannockburn, Balquhiddeloch Wood, along the Pelstream and core walking routes. 3. Draw up, with the owner(s), of a proper plan for the restoration and extension of Balquhiddeloch Wood. The land adjacent to Balquhiddeloch Wood has some natural oak regeneration occurring. 	<ol style="list-style-type: none"> 1. Agreed. The draft Alive with Nature Plan includes actions and targets relating to the collection of biological data by volunteers and environmental organisations. An accurate baseline is crucial to monitoring the impacts of our actions. 2. Stirling Council Street Cleansing team recognise litter is a local and national issue. The team regularly service litter bins, carry out litter picking in public parks, village streets, verges and the city centre to maintain a cleaner environment for residents and visitors. The service supports local community volunteer groups to carry out local action by supplying bags and collecting these for disposal. The Council also participates in the national litter monitoring scheme administered by Keep Scotland Beautiful. 3. Noted. Increasing the connectivity of our natural environment, including ancient woodland areas such as Balquhiddeloch Wood, forms a key element of the draft Alive with Nature Plan.

		<ol style="list-style-type: none"> 4. This land adjacent to Bannockburn High School provides a number of different types of habitat and along with the nearby Ladywell Park with the Bannockburn would provide a good place to have a schools education natural environment education centre. 5. Grass managed for bio-diversity does not need to be mown that often but does require a proper programme of maintenance. This includes the removal of all grass and plant cuttings to prevent the soil becoming too rich and wild flowers being overwhelmed. 6. There is a need for much larger areas of land to be planted up with wild flowers than the small areas on roadside verges. These are a good start. Areas as large as all the lower end of Ladywell Park between the football pitch and Pike Road entrance need to be planted for wildflowers. 7. The council needs to develop a policy of allowing hedges to grow, an immediate gain for carbon capture. Also providing additional nesting sites for birds that nest higher up off the ground. The flowers produced would attract insects. The insects feed young birds. More birds fledge and survive to breed. This policy could help some red listed species of conservation concern, (House Sparrows and Starlings among others) to more easily survive and reverse their decline. The policy would have to include a rota for hedge trimming so that a long hedge would have trees, bushes of different heights all the time. 8. This hedge growing policy should include land owned by farmers and other public bodies. 9. The council should stop cutting back wild flowers that are growing alongside core paths. 10. Develop and enact policies to prevent the spread and eliminate invasive non-native species, beginning with Giant Hogweed, Himalayan Balsam and Japanese Knotweed. 11. Develop a policy of linking green spaces, perhaps using roadside verges more imaginatively. This could allow species isolated green spaces be more easily colonised by wildlife. 12. Bring forward 2035 target for 35% of the land managed for biodiversity to 2030 and 50% by 2038. 13. Where are the Local Natural Conservation Sites? 14. There is no reason why a child should not have regular access to a natural environment site now as a part of education, both formal and informal. 100% by 2021. 15. Develop a policy to include more and more diverse native trees into commercial forestry developments. Trees to be left standing when other trees harvested. 16. Develop of policy of persuading farmers to plant individual trees or small clumps of trees on land used for grazing. This would help with the biodiversity of their land and the area as a whole. 	<ol style="list-style-type: none"> 4. Agreed. 5. Agreed. The adjusted maintenance of Council-owned land will be included in the Stirling Pollinator Strategy that is due out for consultation later this year. 6. Agreed. This will also be covered by the Stirling Pollinator Strategy. 7. Agreed. This will also be covered by the Stirling Pollinator Strategy. 8. Agreed. 9. Agreed. This will also be covered by the Stirling Pollinator Strategy. 10. Reducing the impact of invasive non-native species is an element of the draft Alive with Nature Plan which is due for consultation later in 2021. 11. Agreed. This will also be covered by the Stirling Pollinator Strategy. 12. Where possible, the targets will be achieved in a shorter timescale. 13. The LNCS are located throughout the Stirling Council area. 14. Noted. 15. The Alive with Nature Plan includes a commitment to work with partners to deliver the wider changes to our landscape that are needed to combat the climate and nature emergencies. 16. See comment above.
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A18.15	NatureScot (by email) 5 May	Our priority is to find nature-based solutions to optimise biodiversity and increase the carbon storage potential of nature (Objective 4). We can help you to plan how we work with land managers to reduce emissions from farming as well as increase carbon sequestration from peatland restoration and woodland expansion. We will do this through our continued participation in the Stirling Alive with Nature Plan and through other projects for example the Urban Trees Project and the Forth River Parc. Although in the future the role of Regional Land use Partnership will be key here. We would welcome further discussion with you and the other Local Authorities on progressing this and the Natural Capital Assessment it will be based upon.	Noted.
A19. Nature & Biodiversity: General			
A19.1	Pat Morrissey (Engage Stirling platform) 18 March	More inspiring words with no specific clear plan of action.	The Climate & Nature Emergency Plan is a strategic document. The detail will be provided within the Alive with Nature Plan which will be released for public consultation later in 2021.
A19.2	Anne White (Engage Stirling platform) 2 April	The plan is very short on detail. I am concerned that trees will be planted and then there will be no after care. You can see examples of this all over the country. It is a waste of time and money just to plant trees and then abandon them. Yes, you can tick off a certain number of trees planted but it won't be very effective in terms of the overall goals of the project.	The management of Council-owned trees and woodlands, both existing and newly planted, will be included in the Council's Tree & Woodland Policy which will be released for public consultation later in 2021.
A19.3	Susan Dyer (Engage Stirling platform) 8 April	I agree with most of the other comments already posted. I would like to see a complete ban on green belt development. There are plenty of brown site areas where housing and commercial building and redevelopment can take place. We are going to need green belt land to store carbon as well as produce food.	<p>National Planning Policy and Guidance on green belts are reflected in the Stirling Local development Plan (LDP). Green Belts are designated around Stirling, Bannockburn, Bridge of Allan, Dunblane and Strathblane. Development should preserve the openness of Green Belts and should not undermine their core role and function by individual or cumulative impacts. Development in the Green Belt will only be supported where it supports diversification of the rural economy. A range of types and scales of development which would be appropriate within a green belt are identified, e.g relating to agricultural, forestry outdoor recreation, essential infrastructure and new housing that satisfies relevant criteria in the Council's Housing in the Countryside Policy and Guidance.</p> <p>A complete ban on new development in the green belt cannot therefore be supported, that said it can be seen only limited types of compatible developments are likely to gain planning permission.</p> <p>Again, in line with national guidance, the LDP promotes a sustainable pattern of development appropriate for the area, including making best use of urban and brownfield land in sustainable locations.</p> <p>Emerging national planning policy and guidance indicates there will be continued support for green belts and prioritisation of brownfield land for new development.</p>

			Some brown field sites are valuable for biodiversity and recreation, for example Fallin bing. Development of brown field sites will be considered where relevant.
A19.4	Tom Palmer (Live Event) 8 April	Why focus on trees when peat restoration is a more efficient carbon sink?	<i>Answer provided during the Live Event:</i> Peatland restoration will form a key part in us achieving our carbon zero target. Healthy peatlands not only act as a carbon sink but also keep previously stored carbon safely locked up. The carbon sequestration rate is much higher in trees and so tree planting is also a key element of our plan. More details on peatland restoration, woodland creation and urban tree planting will be included in our Alive with Nature Plan which will be out for public consultation later in 2021.
A19.5	Anonymous (Live Event) 8 April	large portion of Stirling council area is made up of commercial forestry and degraded habitat with low biodiversity agricultural land. How are the council going to get forestry Scotland and landowners help with our biodiversity and carbon sequestration. They do not have the best track record.	<i>Answer provided during the Live Event:</i> We are already engaging with partners, including Forest & Land Scotland, Green Action Trust, and landowner representative organisations to discuss the changes that we need to make to our land management to achieve our zero carbon target and secure benefit for biodiversity. We will establish a landowner forum to encourage these changes.
A19.6	Anonymous (Live Event) 20 April	why is protection of peat lands and restoration of peat lands not a more important element of the plan. It is the most cost effective tactic	<i>Answer provided during the Live Event:</i> Peatland restoration will form a key part in us achieving our carbon zero target. Healthy peatlands not only act as a carbon sink but also keep previously stored carbon safely locked up. More details on peatland restoration will be included in our Alive with Nature Plan which will be out for public consultation later in 2021.
A19.7	Anonymous (Live Event) 20 April	How do we balance access to nature with the pressures on popular beauty spots? Dumgoyne, Balmaha and Finnich Glen have been significant pressure points during the pandemic.	<i>Answer provided during the Live Event:</i> A key objective of this Plan is to give everyone access to the natural environment. This will include access to local greenspaces and the wider landscape. Littering, pollution and environmental vandalism show that people have become disconnected from nature and do not appreciate the benefits that a healthy natural environment can provide. Through this Plan and the Alive with Nature Plan we aim to address this issue by reconnecting people with nature. Research shows that a healthy natural environment has positive impacts on our health and wellbeing and that people who value the benefits that nature provides are more likely to treat our environment with respect
A19.8	'Out in the sticks' (Live Event) 20 April	Will you educate the non-rural dwellers to respect all this 'new nature'???	This Plan does not distinguish between rural and urban populations, it aims to increase awareness and action amongst all residents.
A19.9	William Ruddell (Engage Stirling platform) 21 April	Whilst agreeing the general principals I would strongly support the comments and suggestions made by TreeLinkstirling. Joining the UN Tree cities of the world programme would be a real statement of intent. Much more attention needs to be directed to our "urban forest" which offers huge potential for mitigating vehicular pollution, in particular looking after and planting more street trees, many magnificent specimens of which have been replaced by random and quite inappropriate species.	The principles promoted through the UN Tree Cities of the World Programme fit with those included in the draft Stirling Council Tree & Woodland Policy, which is due for public consultation later in 2021. Increasing the number of urban trees and our urban tree canopy is an action within the CaNE Plan and a key element of the draft Alive with Nature Plan, which is due for public consultation later in 2021.

A19.10	FEL (by email) 3 May	<ul style="list-style-type: none"> We believe there is a need to conserve and enhance both the natural and historic environment and cultural heritage of the area; increasing built and natural environment distinctiveness through high quality, sustainable design and multi-functional green infrastructure provision. We would like to understand how you are measuring the biodiversity impact of new developments. All development proposals should be required to provide a measurable increase in biodiversity. Major development proposals should secure a minimum measurable biodiversity net gain (e.g. 10%) <ul style="list-style-type: none"> There is no mention of Stirling's Food Growing Strategy, access to food growing spaces/land. We would like to see how nature and biodiversity plans will improve resident's health and wellbeing. 	<p>Agreed.</p> <p>Policy 8.1: Biodiversity Duty in the current LDP states: development proposals will be assessed for their potential impact upon biodiversity. Depending on their scale, nature and location planning applications will be supported by commensurate ecological/ biodiversity impact reports and statements. For larger-scale projects, with the likelihood of significant environmental impacts, these will form part of a wider Environmental Impact Assessment (EIA), the findings of which are set out in an Environmental Report. In certain circumstances, proposals will also be subject to an 'appropriate assessment' to ensure the integrity of European 'Natura' sites will not be adversely affected.</p> <p>Developments likely to lead to a significant loss of biodiversity will only be supported if provision can be made on or off-site to maintain species populations and / or create or enhance comparable habitats such that overall biodiversity is maintained.</p> <p>A statutory requirement for the emerging National Planning Framework is to secure positive effects for biodiversity. The Position Statement indicates the national approach to planning supports Scotland's role in responding to the twin global crises of biodiversity loss and climate change, including by strengthening policies designed to protect and restore Scotland's biodiversity and natural assets and to improve their long-term resilience to the impacts of our changing climate. The preparation of the forthcoming LDP will take full account of these changes.</p> <p>A new Priority R05 has been introduced under Objective 3 – Resource Efficiency: • <i>Support development of a sustainable local food economy and minimise the impacts of food choices.</i> That section already makes reference to development of a Sustainable Food Plan, with the Stirling Council Food Growing Strategy an element within it.</p> <p>The draft Alive with Nature Plan recognises, and seeks to maximise, the health and wellbeing benefits that nature can provide.</p>
A19.11	Riverside Community Council (by email) 3 May	<p>Riverside Community Council is in strong support of the plan to protect and develop our green spaces with biodiversity at the forefront of decision making. Education for communities on what that means would be invaluable.</p> <p>Our experience has been that the Scottish Government Reporter can overrule decisions Stirling Council previously made. Our fear would be that this continues to happen and contradicts the CaNE Plan – developers need to be responsible for mitigating any environmental imbalance they cause within communities.</p>	<p>Noted.</p> <p>The Scottish Government's Planning and Environmental Appeals Division processes appeals against decisions to refuse planning permission for national and major developments. Reporters are appointed to determine appeals and follow the same decision-making procedures as Councils, i.e. are required to determine appeals in accordance with the development plan, unless material considerations indicate otherwise. Emerging national planning policy and guidance advocates the rebalancing of the planning system so that climate change is a guiding principle for all plans and decisions. There is thus</p>

			likely to be strong 'in principle' development plan support for planning based objectives and actions in the CaNE Plan.
A19.12	University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May	<ul style="list-style-type: none"> • Would be nice to see concrete plans for reforestation or diversification of land use away from bare agricultural land as well as plans for diversification of forests for climate resilience and biodiversity. • Stop mowing roadside grass • Much more community engagement needed here too, to maximise on gains for biodiversity and people. At a minimum there could be information boards explaining why grass is left to grow, what people may see when they are using that particular greenspace etc. • Littering is a massive problem still and that also needs to be addressed • In the actions section, the plan to plant trees needs to be evidence-informed: which tree species and where • There are more benefits that biodiversity can bring e.g. flood control, so this could be mentioned in this section too (linking to section 5) • Who are the partners that will deliver woodland creation etc? This is very vague 	<p>Agreed. We are already engaging with partners, including landowner representative organisations, to discuss the changes that we need to make to our land management to achieve our zero carbon target and secure benefit for biodiversity.</p> <p>This Plan includes a target to manage 50% of the Council's open space for biodiversity.</p> <p>Agreed. This is being discussed as part of the development of the Council's Pollinator Strategy, which is due out for consultation later in 2021.</p> <p>Agreed.</p> <p>We are working with partners, including Nature Scot and University of Stirling, to establish an evidence base and identify the best areas to undertake tree planting.</p> <p>This Plan cannot list all the benefits that a healthy natural environment can provide. More detail will be included in the Alive with Nature Plan. The Council is currently working with a small number of environmental organisations including Nature Scot and Green Action Trust. This partnership will grow to enable the delivery of the actions within this Plan.</p>
A19.13	Transition Stirling membership (by email and Engage Stirling platform) 4 May	<ul style="list-style-type: none"> * We are really pleased to see such an emphasis placed not just on reducing our environmental impact, but also on regenerative actions being taken, such as the focus on tree planting and restoring our pollinator populations. * There was concern that the brown bins could encourage people to buy artificial grass if they don't want to keep paying for their uplift. Those who might have been on the fence about getting artificial grass might now be more encouraged. * We like that Stirling Council has made an effort not to strim wildflowers so early in some areas and we would like to see more of that and for it to be more widespread, saving the Council money. Once people get used to seeing the beauty of the wildflowers in bloom, we hope they will realise the benefits. * People could be encouraged not to have large amounts of tarmac or monobloc at their homes. * We welcome the ambitious targets for tree planting, but we felt it was very vague. For example, where will the trees come from? What kind of trees? Will they be native? Will they be fruiting? Where it says in the Sustainable Development Strategy "Working locally to respect the limits of the environment, resources and biodiversity" – what does that mean? As well as presumably extensive areas of tree planting, it would be good to also consider the improvement of biodiversity and tree planting in urban 	<p>Noted.</p> <p>Noted</p> <p>The draft CaNE Plan includes a target to manage 50% of the Council's open space for biodiversity.</p> <p>This will be picked up in Climate Adaptation work.</p> <p>We will favour native trees, including fruit trees, of local provenance where this is appropriate. Within urban settings there may be situations where non-native trees are the most appropriate tree and provide the most biodiversity and climate benefits. Street trees and trees within urban parks will form an important part of the Alive with Nature Plan and the Pollinator Strategy which are due out for consultation later in 2021.</p>

		<p>areas as many streets in Stirling lack trees and biodiversity and these are beneficial for wellbeing.</p> <p>* We would like to see more information on action that will be taken to prevent fly tipping and littering.</p>	<p>National campaigns on education and action on littering and preventative education are championed by Keep Scotland Beautiful and Zero Waste Scotland. Stirling Council's Community Safety team investigate reports of fly-tipping and where possible seek to identify culprits and have enforcement powers to issue littering fines.</p>
Climate Adaptation			
A20. Climate Adaptation: Priorities			
A20.1	<p>Green Action Trust (by email) 23 April</p>	<ul style="list-style-type: none"> GAT is fully supportive of all the priorities listed under this objective. We are pleased to see the inclusion of implementation of a prioritised programme for nature-based climate adaptation actions. 	Noted
A20.2	<p>FEL (by email) 3 May</p>	<ul style="list-style-type: none"> We believe support and development of local supply chains should be specific here. The omission of the local food system and the role it will play in climate adaptation is regrettable. Given the Covid landscape we now live in, we feel that mitigation measures for new diseases should be included here. We would like to see how climate adaptation plans will improve resident's health and wellbeing. 	<p>The issues in the first 3 bullets are picked up in the 1st and 5th Priorities: CA01 <i>Maintain a clear understanding of climate change risks</i> CA05 <i>Build resilience into supply chains</i>,</p> <p>The issues raised will be addressed in more detail in ongoing assessment of risks and the planned Adaptation Strategy.</p>
A21. Climate Adaptation: Targets			
A22. Climate Adaptation: Actions			
A22.1	<p>David Mitchell (by email) 23 March</p>	<ul style="list-style-type: none"> Good forecasting is key to good planning. Integral to assessment of new development on flood plains particularly. Design and specification of urban landscapes are inadequate to manage excessive precipitation events at present. Existing buildings were designed to shed water much less than is current and forecast. Adaptation measures need to look at water management at both macro and micro level e.g. gutter sizing and design of drainage. 	<p>The Objectives on page 27 cover most of these points. The update to the Stirling area Adaptation Strategy will also consider these issues in more detail.</p>
A22.2	<p>Rachel Nunn (by email) 12 April</p>	<p>Our efforts on flooding appear to be robust – and very pleased to see eco-system services is at the fore here for interventions. However, there is (from experience) a need to put greater resource into the flood prevention team so that they can tackle landowners who are not undertaking the flood prevention measures they are obliged to undertake. I recognise that in Stirling, flooding is our main impact – both from rainfall events and sea level rise. But there are going to be other climate change impacts and these are not addressed at all in this strategy.</p>	<p>Noted.</p> <p>Wider impacts than flooding are recognised in the Priorities and Key Actions. These issues will be addressed in more detail in ongoing assessment of risks and the planned Adaptation Strategy.</p>

		We are still some way (& in Scotland mercifully insulated against) some of the more concerning elements of climate change: food supply disruptions, migration, spread of new disease as places such as Scotland get warmer; possible heat damage to infrastructure; new needs for cooling; possible energy shortages (not sure if this fits here). This plan needs to indicate who is thinking and planning for these other impacts.	These issues are outlined in the 5 th Priority: <i>Build resilience into supply chains</i> , and will be addressed in more detail in ongoing assessment of risks and the planned Adaptation Strategy.
A22.3	Name provided (by email) 13 April	While the actions in this section seem reasonable as far as they go, it would be helpful to widen the Council's approach to explicitly support communities to develop resilience groups and plans, so that they are better able to respond to unexpected extreme events.	This is the role of the Community Resilience Scheme referred to on pages 27 and 29.
A22.4	Green Action Trust (by email) 23 April	<ul style="list-style-type: none"> GAT would welcome the opportunity to work closely with Stirling Council to develop and implement a robust Climate Adaptation Strategy GAT is well placed to provide support to Stirling Council in the development/delivery/monitoring & evaluation of actions set out under the Lead/Enable/Inspire cross cutting themes and would welcome the opportunity to discuss this in more detail. 	<p>Noted</p> <p>GAT has been added to the stakeholder list for engagement on Climate Adaptation and broader biodiversity / nature considerations.</p>
A23. Climate Adaptation: General			
A23.1	Clare Andrews (Live Event) 20 April	How will resilience (e.g. flood risks) be incorporated into planning policy?	<i>Answer provided during the Live Event:</i> Flooding considerations are already incorporated into the Local Development Plan and will be updated in each Plan review. Planning applications are also considered by our Flooding officers. The Climate Adaptation Strategy will look at wider resilience issues, including working with Community Councils to encourage development of Community Resilience Plans.
A23.2	Name provided (by email) 29 April	A major factor that has to be addressed is educating the public not only about the risks but in what they can do to reduce those risks. Much of what I have to say on this is included above. Cutting carbon emissions, planting more trees, growing better hedges, cutting waste.	Most of the actions listed will help tackle carbon reduction rather than climate adaptation, although the natural environment plays a key role in building resilience.
A23.3	Riverside Community Council (by email) 3 May	<p>Flooding is a constant fear for Riverside and we want to be involved and consulted in all plans to protect our homes.</p> <p>Community Resilience is something that is currently relevant to Riverside and having an understanding of what we could expect from Stirling Council in terms of resources and support would be beneficial.</p>	<p>The Risk & Resilience Team are working closely with the Council's Flood Team and Scottish Flood Forum to support local communities to ensure they are prepared and to help improve community resilience. The Team is working to set up groups across Stirling.</p> <p>The following lists examples of assistance and guidance the Team can provide:</p> <ul style="list-style-type: none"> Help set up Flooding Groups and Community Resilience Groups. Information on funding available. Help to develop and/or review Community Resilience Plans. Relevant help/information/guidance. Work together to identify vulnerable people within communities who may be adversely affected by flooding or other issues.

			<ul style="list-style-type: none"> • Training and exercise events. • Attendance at Community Resilience Group meetings. <p>This list is not exhaustive and if there are any questions please do not hesitate to make contact. If you would like to set up a group please contact this email: resilience@stirling.gov.uk</p>
A23.4	HES (via SEA Gateway) 4 May	In maintaining our existing infrastructure assets, appropriate adaptation is necessary to ensure that approaches which may harm the fabric or cultural significance of our historic buildings are avoided. HES has undertaken extensive and pioneering work on climate change adaptation. Our Climate Action Plan 2020-25 sets out how we plan to share knowledge, build resilience and support others in addressing the climate emergency. We have also issued guidance on Climate Change Impacts (HES, 2019) and the Use and Adaptation of Listed Buildings (HES, 2019) and technical information on Fabric Improvements for Energy Efficiency in Traditional Buildings (2013). We recommend that this knowledge and experience is utilised in the development of asset management strategies, and is also used to explore how the Plan and related strategies can encourage and support appropriate adaptation of traditional and historic structures by the Council and others, including businesses and domestic property owners.	Noted
A23.5	University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May	<ul style="list-style-type: none"> • Objective 5: Plan and prepare for the impacts of climate change – misses a trick by not linking it back to objective 4 - Optimise biodiversity and increase the carbon storage potential of nature. <p>Objective 5 is mainly about flood management. One way the council suggest to tackle this is by discouraging development of/building in the floodplain. This I think could be stronger worded but also one could 'discourage' by having more Local Nature Conservation Sites set up in the flood plain. Thinking about wetlands creation further increases the carbon storage potential in such areas, and one may even think of how beavers could help with that and biodiversity in certain parts of Stirling Council</p> <ul style="list-style-type: none"> • The inspire section is very weak. Community engagement could be brought in here too in order to understand residents' values and perceptions with regards to climate change adaptation – understanding this could help inform council actions 	<p>The link is made clear in Priority CA03: <i>Implement a prioritised programme of nature-based climate adaptation actions</i> and in the Key Action listed in the 2nd bullet, under 'Enable': <i>Make best use of green spaces as natural adaptation solutions to climate impacts (flooding, drought, overheating) as a major priority in our work.</i></p> <p>As more frequent and more intense rainfall is one of the main direct impacts of our changing climate then adaptation work rightly considers flood management, but other impacts are also captured by Objective 5.</p> <p>Working with Community Councils, this is what the Community Resilience Scheme aims to do.</p>
A23.6	Transition Stirling membership (by email and Engage Stirling platform) 4 May	<ul style="list-style-type: none"> * One significant impact of climate change will be how our food systems are affected. The plan should therefore discuss food insecurity and how to adapt to that and increase the resilience of our food system now. * We felt that the link between adaptation and mitigation could be made clearer for people to understand the benefits, for example, vegetation cover and wetlands. 	<p>This is outlined in Priority CA05: <i>Build resilience into supply chains</i>, and will be addressed in more detail in ongoing assessment of risks and the planned Adaptation Strategy.</p> <p>Due to the understandable emphasis on carbon reduction, many people are not clear about the difference between climate mitigation and climate adaptation so it is important to retain the distinction until understanding improves. The multiple benefits of green space will be emphasised wherever appropriate.</p>

		* Stirling Council should support or highlight further the benefits of nature based solutions, for example, nature based projects as solutions to Stirling's significant flooding issues.	This is picked up by Priority CA03: <i>Implement a prioritised programme of nature-based climate adaptation actions</i> and the Key Action to <i>Make best use of green spaces as natural adaptation solutions to climate impacts (flooding, drought, overheating) as a major priority in our work.</i>
Enabling Actions			
A24. Enabling Actions: General			
A24.1	Anonymous (Live Event) 8 April	There are many mentions about 'key partners' involved in developing the plan. Would it be possible to clarify who are these partners? Thanks.	<i>Verbal answer provided during the Live Event</i> referred specifically to membership of the Sustainable Stirling Partnership, but also included a wider sweep of other partners.
A24.2	Riverside Community Council (by email) 3 May	Riverside Community Council welcomes proposals to help engage and empower us to represent and support our community effectively. The key points for us are information, communication and consultation.	Noted
A24.3	University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May	Council could go further in not just inspire but putting a little more pressure on businesses to follow suit	The Council aims to engage with business and has developed a working group, which includes Forth Valley Chamber of Commerce and Go Forth BID, where issues raised in the CaNE Plan can be discussed.
A24.4	Transition Stirling membership (by email and Engage Stirling platform) 4 May	Again, a lot of this section tells the reader to go to other publications. It feels as though it is passing the buck to different documents but it is difficult to comment as we haven't seen those strategies.	The Plan is a high-level, strategic document intended to indicate direction of travel and, as such, needs to influence a number of other documents. Some of these documents are under development while others need updating to incorporate Emergency considerations.
A25. Enabling Actions: 1. Strong Governance			
A25.1	Anonymous (Live Event) 8 April	How are you going to further involve the local communities during the consultation process? Thanks.	The consultation period was between 9 March and 4 May (8 weeks), and was widely promoted through the press, local radio, by email and on social media, with the opportunity to respond by email, on the Engage Stirling platform and at 3 Live Events. The draft Plan is the latest step on the journey to tackle the Climate and Nature Emergency, with level of ambition under constant review through ongoing consultation and engagement to keep pushing local targets and action further.
A25.2	Rachel Nunn (by email) 12 April	The Chief Exec for the Council needs to be ultimately accountable for this plan...and for meeting the types of SMART target (many of which are missing – particularly in land-use) that my feedback suggests is necessary for making meaningful local reduction in our collective emissions.	Agreed. The Chief Operating Officer for Infrastructure & Environment has the role of strategic lead.

		There are incredibly knowledgeable individuals in Stirling who don't necessarily belong to the organisations the council is thinking of recruiting from for the Sustainable Stirling Partnership. The catchment, to ensure these people can help steer / inform the plan, needs to be wider. In addition, all members of this group need to commit specific time into this plan – and where appropriate, organisational partners must commit resources to help achieve the goals.	Noted. In addition to the Sustainable Stirling Partnership, the Plan refers throughout to community champion forums, a Landowner Forum, and wider partners for different themes and actions.
A25.3	Naomi Ross (by email, following 2 nd Live Event) 14 April	Finally, re civic engagement - great this is being considered. It's worth bearing in mind that in many other crises, people have acted because government has told them to and made clear the urgency of the situation e.g. right now we have nationwide adverts reminding us of the sacrifices/precautions we need to be taking to tackle Coronavirus, during the War, same thing contributed to citizens taking up urban farming, accepting rations, turning their lights off etc. Whilst the council can't run national campaigns, it would be good to see locally delivered ones of this nature for climate change, either on local radio or in local magazines. I understand partners such as home energy scotland may be doing these too, but for a citizen who doesn't consider climate change to be a big deal, they are more likely to respond when the council tells them it's important than they are when a "green" organisation with "agendas" does.	Research frequently indicates that the public have greater trust in environmental organisations than in government, depending on the situation and context. The challenges of the Climate & Nature Emergency are so great, however, that this information needs to be integrated into messaging from all sources: from all levels of government, the wider public sector, 3 rd sector, other organisations and business, and through all film and media outlets.
A25.4	Anonymous (Live Event) 20 April	How will the council governance evolve to ensure climate change is considered across all policy areas in a systems based approach rather than existing linear policy making?	<i>Answer provided during the Live Event:</i> New governance systems are already being established with working groups of key officers for each of the main themes and a Climate Emergency Board of representatives from across the Council to oversee their activity.
A25.5	RASPS (by email) 30 April	<p>4.4. The Ipsos MORI research shows that 84% of the Scottish public are concerned about climate change. Within this, two in five (38%) are very concerned. Concern is highest among young people; 96% of those aged 16-24 say they are concerned. Civil societies' interest and response to climate action is therefore likely to become increasingly vocal in future years. Embedding engagement and co-production now is necessary to productive future relationship between civil society and public authorities.</p> <p>5. Stirling Council recognise the diverse leadership and governance needed to tackle the climate emergency.</p> <p>5.1. We recognise that the Stirling Council Climate and Nature Emergency Plan is the response of the local authority to climate action. Other public agencies and the third sector may also develop plans that cover their operational response to tackling climate action. There is a need for strong partnership working and collective governance to ensure that public, private and third sector organisations in Stirling have a clear shared vision on climate action.</p> <p>5.2. The Stirling Sustainability Partnership, as a sub group of the Stirling Community Planning Partnership, has a critical role in leading a shared</p>	<p>Noted</p> <p>Noted</p> <p>Agreed</p>

		<p>vision, and ensuring that climate action is an important element of achieving the Stirling Plan.</p> <p>5.3. RASPS recommend that an engagement and participation strategy aligned with the Climate and Nature Emergency Plan is developed to recognise the active role that citizens wish to play in tackling climate change. Manifestations of this activism can be seen in environmental community based initiatives, school based projects, and protests led by citizens of all ages. Encouraging activism and citizen voice should be a central part of the Climate and Nature Action Plan.</p> <p>5.4. In any community engagement and participation strategy it is vital that Stirling Council prioritise engagement with people heard least on these critical issues, but who also would be most affected by climate change. The Climate and Nature Emergency Plan cannot be seen in isolation from Community Planning and the Stirling Plan. Tackling Poverty and Inequality must feature highly in the Climate and Nature Plan, and we must listen and address the needs of all citizens – not just those who are presently able to comfortably afford the purchase of electric vehicles.</p> <p>5.5. The third sector have taken further steps to improve their collective voice on climate action through the establishment of RASPS. Moving forward we ask that third sector representation on SSP, and subgroups, be organised through RASPS to improve representation, accountability and multi-agency working.</p>	<p>The report to 24 June Council included an action to prepare a Climate Emergency Community Engagement Plan in line with the Council's corporate Community Engagement Plan framework.</p> <p>Agreed – the Council's first (2014) Adaptation Strategy recognised climate change as a 'risk multiplier' that interacts with other trends to make it even more difficult to address issues such as poverty, disease, and food insecurity.</p> <p>Noted</p>
A25.6	<p>University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May</p>	<p>There could be a citizens group, or something like this, to hold the council accountable for delivering and tracking progress on this plan (at the moment the council write the plan and audits whether it's meeting the targets.... not ideal and not transparent!). There are community champion forums but these need to have power and be able to hold the council to account; also care needs to be taken with how participants are "selected" to be part of these groups to ensure equity and transparency</p>	<p>The Climate Change (Scotland) Act 2009 places duties on public bodies regarding climate change ((i.e. to reduce emissions, adapt to climate change and act sustainably). In 2015, Scottish Government introduced a Statutory Order requiring larger public bodies (such as Stirling Council) to submit an annual report detailing their compliance with these Duties. Reports are submitted to Scottish Government for analysis and assessment every November via Sustainable Scotland Network (SSN).</p>
A25.7	<p>Transition Stirling membership (by email and Engage Stirling platform) 4 May</p>	<p>* There should be more information on how the community champions are selected. Who are they accountable to? * For the Sustainable Stirling Partnership to review progress where will the capacity come from? After discussions with councillors it is clear that it is difficult enough to get all the partners together regularly, how will they have sufficient time to do this effectively? Will their capacity be increased in some way? How will the partners who are chosen to do this be selected? Will Stirling Council be choosing the people who should review their progress? Even as an organisation working directly in climate change and sustainability issues, we have been trying to get a seat in those meetings for a long time now and are only invited to those on circular economy which haven't met for a long time. We feel there should be significantly wider third sector representation than there is currently.</p>	<p>This level of detail is not appropriate in a high-level, strategic document.</p> <p>These are key issues for an effective response to the Emergency – on a global as well as local level. Each organisation will need to review its own priorities, commitments and resourcing.</p> <p>In addition to SSP reviews, the Council has a statutory duty to report annually to Scottish Government, as detailed in the response to University Biological & Environmental Science students above.</p> <p>Noted</p>

A26. Enabling Actions: 2. Planning and skills supporting economic development			
A26.1	Rachel Nunn (by email) 12 April	<p>This is all sound although a little low on detail: it would be reassuring for the plan to mention some of the start-ups it is thinking that will come to the fore. For example, the lack of a border carbon tax means that we can all keep buying cheaper goods from places like India and China which have much higher emissions because they are still using fossil fuels to underpin their manufacturing processes; are we going to encourage start-ups that can displace some of this consumption?</p> <p>I would also be reassured to know that the training / qualifications that council officers, and ALL council members undertake is robust, and not some light touch session. The courses that the Royal Scottish Geographic Society & Stirling University has put together is excellent – full of examples of good practice drawn from across the globe; the KSB course is, I understand, of little use for the complexities & systems thinking that officers and politicians are going to have to understand and address.</p>	<p>The Circular Economy Business Support Partnership that the Council has established will look at the best means of encouraging and supporting start-ups as well as providing resource efficiency guidance to existing businesses. Supporting the business community will form a key component of the Circular Economy Plan.</p> <p>Training and skills development is required for different aspects of the organisation and will be rolled out accordingly.</p>
A26.2	Name provided (by email) 13 April	<p>It's very welcome to have this section included, to ensure that climate change responses are delivered in ways which (ideally) create new economic opportunities and consider how best to help other sectors adapt.</p> <p>However, experience suggests that there will be a need for tailored approaches, which are less about climate change in general, and more about what actions are appropriate and helpful for individual sectors or businesses. Business development services will need to reflect this aim, and also be consistent in assessing new proposals to ensure they are future proofed.</p>	<p>Noted</p> <p>A range of business support services are already in place to promote the benefits of low carbon activities, both to the business and beyond. This is regularly reviewed and tailored to specific sectors, to ensure that support is relevant for businesses.</p>
A26.3	Transition Stirling membership (by email and Engage Stirling platform) 4 May	<p>We like that it talks about involving young people.</p>	<p>Noted</p>
A27. Enabling Actions: 3. Data and clear information			
A27.1	Rachel Nunn (by email) 12 April	<p>Without being able to see the KPIs, (unless it's the ones in this plan, which, if this is the case, they are insufficient) - it's rather hard to judge how robust this part of the plan is. I'm finding it really hard to envisage the extent to which 'communities' are going to be able to get involved on a meaningful scale – at the 'rate' of change this emergency requires – and indeed at the rate required by your headline targets. More clarity on who is meant by 'communities' is required, how they are going to be involved and what specifically are they going to achieve.</p>	<p>The Plan provides a strategic overview of direction of travel and is not intended to be prescriptive of every conceivable action every individual, group or organisation should take to tackle the Emergency.</p> <p>'Communities' is used as a catch-all term to include geographical, civic, interest, and new, emergent or yet-to-be-established groups.</p>

A27.2	Transition Stirling membership (by email and Engage Stirling platform) 4 May	KPIs are mentioned here but it is unclear which KPIs it is referring to.	These are the KPIs in the Targets tables for the previous 5 themed Objectives.
A28. Enabling Actions: 4. Finance and Funding			
A28.1	Clare Andrews (Live Event) 20 April	Will divesting the pension fund used by the council from fossil fuels be a part of that leadership for sustainable finance?	Divestment from fossil fuel investments is an action in the Sustainable Growth Agreement, signed with SEPA in August 2018. Climate change is now recognised as a financial risk and Trustees continually review how this risk can be mitigated.
A28.2	RASPS (by email) 30 April	6. Stirling Council properly resource the Climate and Nature Emergency Plan 6.1. We recommend that Stirling develop, in collaboration with the third sector and other agencies, a long term strategy to finance net zero. Saving realised through the implementation of the plan should be ring-fenced and reinvested into supporting further progress towards net zero. 6.2. Transparency in the total budget required to finance the plan, and current budget allocations, will support multi-agency working and identify how shortfall can be financed, including through third sector innovation and fundraising.	Given the timescales involved, it is not feasible to develop a comprehensive finance plan: the Finance and Funding page in the Key Enabling Actions section outlines the main issues and approach, while Plans developed under each Objective theme will contain further detail. Government announcements for new initiatives (legislation, regulation and finance), the costs of new technology, and development of new innovations are changing frequently. To be successful, however, many of the required changes need to be made within existing resources – both financial and staff – by adopting a flexible approach and changing the way organisations operate and individuals behave.
A29. Enabling Actions: 5. What we buy			
A29.1	Transition Stirling membership (by email and Engage Stirling platform) 4 May	Our understanding is that the members of the Sustainable Stirling Partnership are already experts in sustainability. How will the plan change their purchasing strategies as suggested?	Organisations employ specialists in a variety of different fields but that doesn't mean all staff are specialists in every field. The question posed is central to the success or otherwise of all responses to the CaNE: how to change existing habits and behaviours? Through information, leadership, collaboration, engagement, inspiring, persuasion, demonstration, enabling, and so on.
A30. Enabling Actions: 6. All of us taking action today			
A30.1	Susan Dyer (Live Event) 8 April	What are you doing regarding public engagement in the process? Will you adopt a citizen's assembly model and will you deliver expert presentations to enable informed public deliberations?	The report to 24 June Council included an action to prepare a Climate Emergency Community Engagement Plan in line with the Council's corporate Community Engagement Plan framework. The Climate Assemblies referred to are good examples of community engagement and we can all learn from their publications.
A30.2	Anonymous (Live Event) 14 April	Following other successful examples of engagement through climate juries/assemblies, has this been considered by Stirling Council?	
A30.3	Clare Andrews (Live Event) 20 April	On community consultation and involvement - any plans for a citizen's Assembly of residents? This could be more effective than a consultation on 'option X or stick with the status quo' which often seems to get more extreme viewpoints. A Citizen's Assembly of representative residents where people are able to become better informed and weigh up different options to address issues could be far more effective for engagement	

		and decision making. The first Scotland-wide Citizen's Assembly looked really promising in setting a vision and principles for nationally and could increase buy-in?	
A30.4	University of Stirling Biological & Environmental Science students (Engage Stirling platform) 4 May	Yes, but there are clearly barriers to people taking action and these need to be fully understood and addressed. Engagement with communities and businesses needed here too.	Agreed First paragraph, 2 nd sentence: "It is therefore evident that many of the improvements needed sit with industry, commerce, and the residents of the area, as well as our visitors".

Appendix B. Comments on the SEA Environmental Report from the Statutory Consultees

SEPA was unable to comment on SEA consultations at the time due to a cyber-attack. SEA topic guidance notes for soil, water, material assets, climatic factors and human health are provided on the SEPA website at [Strategic Environmental Assessment | Scottish Environment Protection Agency \(SEPA\)](#)

	Respondent	Comment	Stirling Council response and amendment
B1. General Comments			
B1.1	NatureScot 30 April	Thank you for consulting NatureScot (formerly Scottish Natural Heritage) on the Stirling Council Climate and Nature Emergency Plan for the Stirling Area SEA Environmental Report. This letter contains NatureScot's comments to the SEA Environmental Report and is restricted to our natural heritage remit. We will comment on the Climate and Nature Emergency Plan separately. We look forward to continuing to work with Stirling Council and the Sustainable Stirling Partnership to develop and deliver the Climate and Nature Emergency Plan for the Stirling Area.	Noted
B1.2	Historic Environment Scotland (HES) 4 May	We are broadly content with the environmental assessment and its findings in relation to the historic environment, subject to the specific comments below.	Noted
B2. Non-Technical Summary			
		No comments received	
B3. Environmental Vision and Objectives			
B3.1	NatureScot 30 April	The Climate and Nature Emergency Plan for the Stirling Area outlines a framework of strategic objectives, priorities, key policies and projects designed to drive delivery of the transformative change within the Stirling municipal area across all sectors that will address the climate and nature emergency. We fully support the vision and objectives of the plan, and moreover the level of ambition demonstrated by Stirling Council.	Noted
B4. Environmental Baseline			
B4.1	HES 4 May	For information, the Historic Environment Scotland Policy Statement (2016) was superseded in 2019 by the Historic Environment Policy for Scotland (HEPS) (www.historicenvironment.scot/advice-and-support/planningand-guidance/historic-environment-policy-for-scotland-heps).	Noted and Environmental Report updated accordingly
B5. Environmental Assessment			
B5.1	NatureScot 30 April	The SEA Environmental Report correctly identifies the environmental issues and concerns and key trends. The assessment of likely significant effects on the environment of the objectives, priorities, supporting plans, and key projects has been carried out satisfactorily. The mitigation measures that could prevent, reduce or offset any significant adverse effects on the environment when implementing the Plan have been clearly identified. We are pleased that our comments on the Scoping Report have been noted.	Noted Noted

		We note that you have deferred a full Habitats Regulations Assessment on the Climate and Nature Emergency Plan until the more detailed planning application stage for specific projects. We understand your rationale that the Plan as it stands is a high level, strategic and long term plan and as such it is not practical to carry out a HRA at this stage. However, we advise that early consideration of the impacts of specific projects on <i>Natura</i> sites is undertaken so as to avoid delays or alterations to deliver of the Plan. We would be pleased to provide further advice and guidance on the HRA process to assist you with this.	Noted
B5.2	HES 4 May	We consider that the assessment could have recognised the potential for positive effects for the historic environment through promotion of the circular economy, by promoting the retention and maintenance of existing buildings over the construction of new.	Noted and Environmental Report updated accordingly
B6. Alternatives			
		No comments received	
B7. Mitigation Measures			
		No comments received	
B8. Monitoring			
		No comments received	
B9. Next Steps			
		No comments received	

Monitoring Indicators

SEA Topic and Objective	SEA Criteria	Indicator	Source
Biodiversity, Flora & Fauna			
Conserve and, where possible, enhance species, habitats, biodiversity and habitat connectivity	<p>Does the Plan:</p> <ul style="list-style-type: none"> • have the potential to have a likely significant effect on a European protected site? • avoid adverse effects on and improve species and habitats? • avoid adverse effects on and improve wider biodiversity? • support a healthier ecosystem? • help promote habitat connectivity? 	<p>Proportion of notified features of protected nature sites (SAC, SPA & SSSI) in favourable condition.</p> <p>Extent of habitat fragmentation or connectivity associated with new development</p>	<p>SNH</p> <p>Monitoring of Planning Applications</p>
Population & Human Health			
Protect human health, reduce health inequalities and promote healthy lifestyles	<p>Does the Plan:</p> <ul style="list-style-type: none"> • improve the health and living environment of people and communities? • improve opportunities for healthier lifestyles? • Safeguard, enhance and promote green infrastructure, green networks and opportunities for active travel? 	<p>Submitted Noise Assessments</p> <p>Access to Open Space – % of population within 400m of 1ha of open space / Usable open space per 1000 residents</p> <p>Provision of Green Network Infrastructure.</p>	<p>Monitoring of Planning Applications</p> <p>Stirling Council Open Space Audit and Strategy</p>
Soil			
Protect and, where appropriate, enhance the function and quality of the soil resource	<p>Does the Plan:</p> <ul style="list-style-type: none"> • safeguard soil quality, quantity and function? • avoid adverse impact on valuable soil resources e.g. prime agricultural land and carbon rich soils? • reduce contamination where it has been found at any of the sites? 	<p>Scale and type of development on land identified in SNH's carbon rich soil, deep peat and priority peatland habitats map 2015</p> <p>Submitted geo-technical surveys and ground remediation studies.</p>	<p>SNH</p> <p>Monitoring of Planning Applications</p> <p>Contaminated Land Register and Vacant & Derelict Land Survey (SC)</p>
Water			
Protect, prevent deterioration and, where appropriate, enhance the water environment	<p>Does the Plan:</p> <ul style="list-style-type: none"> • protect and enhance the overall water environment? • avoid adverse impacts on the status of the river? • enhance the status of the river? • avoid or reduce flood risk? • avoid adverse effects on the coastal environment? • or site allocation connect to public sewage infrastructure? 	<p>Ecological status of water bodies.</p> <p>Proportion of development on land at risk of flooding. Findings of Flood Risk Assessments. Quality of SuDS.</p> <p>Connections to public sewage infrastructure</p>	<p>SEPA Water Body Classification sheets</p> <p>SEPA & Stirling Council (Planning and Flooding)</p> <p>Monitoring of Planning Applications</p>
Air			

Maintain and prevent deterioration of air quality	Does the Plan: <ul style="list-style-type: none"> avoid adverse impacts on air quality, especially from increased traffic volume and congestion? 	NO ₂ and PM ₁₀ concentration Traffic monitoring	Annual Air Quality Management Reports Traffic monitoring reports
Climatic Factors			
Contribute to mitigation of and adaptation to climate change	Does the Plan: <ul style="list-style-type: none"> limit emissions of greenhouse gas emissions? improve adaptability to the effects of climate change? 	Inclusion of energy efficiency measures and renewable technologies in designs Percentage of trips made by active travel/public transport Findings of Flood Risk Assessments, Quality of SuDS, Provision of GI.	Monitoring of Planning Applications. Traffic Impact Assessment & updated Transport Appraisal SEPA & Stirling Council (Planning & Flooding). Monitoring of Planning Applications.
Material Assets			
Minimise waste and energy consumption and promote resource efficiency	Does the Plan: <ul style="list-style-type: none"> promote resource efficiency, including energy, waste, water and minerals? meet the objectives of the Zero Waste Plan and apply the waste hierarchy (prevent, reuse, reduce, recycle)? 	Number of developments connected to new / existing heat networks. Amount of waste generated and disposed of annually Proportion of construction and demolition waste that is reused and recycled	Monitoring of Planning Applications Council waste returns
Cultural Heritage			
Protect and, where appropriate, enhance the character, diversity and special qualities of cultural heritage and the historic environment	Does the Plan: <ul style="list-style-type: none"> protect the historic environment and its setting? enhance or restore historic features and their settings? improve the quality of the built environment? 	Change in number of buildings at risk Number of planning applications consented where adverse impacts on noted built heritage assets are predicted. Number of planning / listed building consent / conservation area consent / scheduled monument consent applications connected to the Plan projects where adverse effects are predicted.	The Buildings at Risk Register for Scotland Monitoring of Planning Applications Monitoring of Planning Applications
Landscape			
Protect and, where possible, enhance the character, diversity and special qualities of landscapes	Does the Plan: <ul style="list-style-type: none"> protect, enhance or restore landscape quality? avoid adverse impacts on protected landscapes? 	Scale and type of development in designated areas.	Monitoring of Planning Applications and SNH