

# Draft **Climate Adaptation Strategy**

## Consultation Responses

11 February to 8 April, 2025

Stirling Council

June 2025

## 1. Introduction

This post-consultation Report has been prepared by Stirling Council to provide a record of how consultation feedback has been used in finalising the Climate Adaptation Strategy and to outline how the responses received during the public consultation exercise have been addressed.

## 2. Consultation

Consultation was carried out on the draft Climate Adaptation Strategy between 11 February and 8 April 2025 on [Engage Stirling](#), the Council's public engagement platform, and via direct email to key groups and organisations. Response options involved a Quick Poll and an annotation facility to the whole document on the Engage platform, or by email to the Council's '*sustainability*' inbox.

Thirty responses were received to the Quick Poll, plus written comments from 15 respondents by email and using the annotation facility to the document on the Engage platform. These longer responses were from 10 organisations, 4 identifiable individuals, and one anonymous comment.

Responses were received from the following organisations:

- Forth Climate Forest (FCF)
- Historic Environment Scotland
- Hydro Nation Chair (HNC)
- Keep Scotland Beautiful
- Loch Lomond & the Trossachs National Park Authority (LL&TNPA)
- Nature Scot
- Scottish Fire & Rescue Service (SFRS)
- Scotland's International Environment Centre (SIEC)
- TreeLink Stirling
- University of Stirling

Responses were spread across each of the different sections of the Strategy, with general comments and observations predominating over any specific aspects of the document. Twice as many comments were received on Outcomes and Objectives 2 and 3 as for 1 and 4.

The tables on the following pages detail all written comments received on the draft Strategy and the Council's responses to those comments, with a summary of responses to the Quick Poll at the end.

## 3. Strategic Environmental Assessment

Stirling Council, as a responsible authority, determined that the Climate Adaptation Strategy would be subject to Strategic Environmental Assessment (SEA) as it was likely to have significant effects on the environment.

Following consideration of the opinions received from the Consultation Authorities to a SEA Screening Report, it was determined that an SEA Environmental Report was not required for the Climate Adaptation Strategy. The main reason for this determination was that any likely environmental effects were considered to be no more significant than those previously identified and assessed for the Climate and Nature Emergency Plan May 2021 SEA (Case Number: 01268).

In accordance with Section 10 (2) of the Environmental Assessment (Scotland) Act 2005, the Determination and Statement of Reasons were published in the Stirling Observer in September 2023.

## Comments received on the Climate Adaptation Strategy Consultation (held between 11 February and 8 April 2025)

No.	Respondent	Summary of comments made	Stirling Council response and any amendment
<b>0. General Comments</b>			
0.0.1	Keep Scotland Beautiful (26 Feb 2025)	<p>Thank you for your email and for the early sight of the Climate Adaptation Strategy for the Council.</p> <p>Congratulations – I am sure that it was taken considerable effort to reach this point and a great opportunity to now start to look forward on the delivery phase.</p> <p>As you will know – our charity is passionate about the need for public engagement across all environmental issues and I hope that the extensive work that we are already supporting across Stirling Schools and some of the community based work that we are engaged with points towards the unique connection that we can provide. We are also working extensively with other councils on adding value to engagement plans with residents.</p> <p>Always delighted to talk about how we can work more closely with the Council within which our charity has called home.</p>	<p>Noted</p> <p>Council officers have met with relevant KSB staff (ongoing).</p>
0.0.2	SIEC/HNC/FCF (4 April 2025)	<p>I have submitted a response to the consultation on the Stirling Council draft Climate Adaptation Strategy on behalf of Scotland’s International Environment Centre (SIEC). You will be aware that SIEC as part of the University of Stirling was established as part of the Stirling and Clackmannanshire City Region Deal, the Environment Centre is funded through an investment of £17m from the Scottish Government and £5m from the UK Government, with additional funding leveraged through private and match-funded investment.</p> <p>We are pleased to see that the documents cover many of the key issues that face our area. Stirling Council has recognised the climate and nature emergencies which we whole heartedly support. To reflect this, we would welcome an even more ambitious approach to delivery given the immediate need to undertake many of these actions.</p>	<p>Noted</p> <p>The draft Action Plan is the first for this Strategy and the introduction to the ‘<i>Programme of Improvement</i>’ on p5 makes clear that the current list is made up of initial actions the Council will be taking. It also highlights that delivery of the Strategy is dependent on the availability of resources, positive collaboration with partner organisations and local communities, and that delivery will evolve in response to changes in legislation, guidance, resource availability, understanding, and knowledge. Many of these aspects are outside the direct control of the Council, hence frequent reference to the need for collaboration, with sub-objectives on joint planning and engagement and a number of actions to support delivery.</p>

		<p>In addition to the comments made through Engage Stirling I wanted to add that SIEC, through projects including Forth Climate Forest, Forth Environment Resilience Array (Forth ERA) and Hydro Nation Chair, is undertaking research and delivering activity that can directly contribute to the achievement of the actions and objectives within the draft Strategy.</p> <p>We, University of Stirling and in particular SIEC, would welcome the opportunity to discuss how we can best work with the Council to support the delivery of for this Strategy.</p>	<p>The Council notes the positive contribution that the projects and activity listed will make to climate adaptation in the area.</p> <p>Council officers will meet with relevant SIEC staff.</p>
0.0.3	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Executive Summary: Our Plan on a page, p4, What is the Strategy?:</i> This Strategy looks to have a focus on activities related to Stirling Council rather than activities that will involve stakeholders across the Council area.</p>	<p>While the Strategy considers global issues and the whole Stirling Council area, the focus of the current Action Plan is on initial action by the Council, with a smattering of ongoing activity with external partners. The introduction to the 'Programme of Improvement' on p5, however, makes clear that delivery of the Strategy is dependent on positive collaboration with partner organisations and local communities, with sub-objectives on joint planning &amp; engagement and a number of actions to support them.</p>
0.0.4	Individual No.1 (Engage platform)	<p><i>Executive Summary: Our Plan on a page, p4, Objectives:</i> In order to develop a clear, science based understanding of the causes of the climate crisis and nature collapse, investment in educating and raising the level of awareness across society, is essential.</p> <p>Based on the science, the council understands and accepts that Climate Change and the Nature Crisis is the most serious threat to humanity and the rest of the living world, therefore mandatory training for educators and all those who work across the public services is essential and this should be implemented now.</p> <p>It is imperative that the science is the guide from which decisions are based and that Honesty, Integrity and Transparency is guaranteed to that stakeholders who hold vested interests in activities or businesses that destroy nature, are major contributors to greenhouse gas emissions, who exacerbate and profit from climate and biodiversity breakdown, are not permitted to block or</p>	<p>Agreed</p> <p>Motion to Stirling Council 3 October 2019 meeting recognised the immediacy of the climate emergency and was agreed unanimously. The motion agreed that the Council would "use our powers to enforce, promote and engage with residents, traders and businesses in the Stirling Council area to reduce carbon throughout the area" and that "Actions must focus on reducing our carbon consumption as well as focussing on resilience and developing a climate ready infrastructure".</p>

		<p>override decisions and actions designed to reduce emissions and restore biodiversity.</p> <p>With reference to Stakeholders, the council must be fully aware of the level of 'greenwashing' , and the type of 'greenwashing', currently being used by organisations to prioritise their profits and develop their businesses. Examples of this can be identified in Children's Education (STEM and in Literacy resources) , the Food Sector and in the Healthcare system.</p>	
0.0.5	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p6, 'Delivering change':</i></p> <p>We would like to see a budget committed to the delivery of this strategy.</p>	The Action Plan highlights that current actions are being delivered using largely existing resources but that this will evolve in response to availability of resources.
0.0.6	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p6, list of potential stakeholders:</i></p> <p>TreeLink <b>Stirling</b></p>	List of potential stakeholders on p6 updated.
0.0.7	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p6, farming &amp; land-owning groups and individuals:</i></p> <p>Other land uses should be mentioned including forestry, sporting estates, etc that manage land for purposes other than farming.</p>	The list is not exhaustive and the collective phrase " <i>land-owning groups</i> " includes non-farming groups referenced.
0.0.8	Individual No. 1 (Engage platform)	<p><i>Main document, p6:</i></p> <p>Stirling Council wants to protect us, as far as is possible, from the consequences we already face from Climate Change and Nature breakdown.</p> <p>Our council hopes to be a leader in strategy to address the major contributing causes of the crisis, locally and globally.</p> <p>To do so, our Council must make difficult decisions which will impact us all but will be necessary to reduce the risk and to reduce the level to which our area is exacerbating the crisis.</p> <p>The current food system is unsustainable and is a major cause of Climate Change, land and water pollution, biodiversity loss and loss of ecosystems.</p> <p>Stirling Council must have the ambition and the courage to become a Plant-Based Council to be at the forefront of the necessary change to a sustainable, nutritious Plant Based Food System for all.</p>	<p>Noted</p> <p>Noted</p> <p>Much food activity supported by the Council is reported in annual <a href="#">Sustainable Stirling</a> reports.</p>
0.0.9	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p6, separate Action Plan:</i></p> <p>We would like to see more detail within the three documents that are part of this Strategy particularly relating to the delivery of the action plan.</p>	Noted

0.0.10	UNISON Stirling Branch (17 March 2025)	<p>Having looked at the poll it looks like it is more focused towards community/service users feedback. As a Trade Union our concerns are more towards corporate response and particularly how Stirling Council delivers their services and supports the workforce and services with change and impact to meet these targets. We would expect to be fully informed and consulted on this through our formal meeting structures and in relation to your services would advise that this may be better undertaken in a discussion forum with a particular focus on the workplace, services and workforce. We are keen to see this on both corporate and service level agendas and indeed work in partnership to deliver on commitments as UNISON have clear policies on Climate Change.</p>	<p>As a pan-Council piece of work, Strategy development and delivery relates to how the Council will work with multiple partners to adapt to the impacts of climate change. The actions within the plan relate to the way that our Council area needs to adapt to the impacts of climate change, and this will require Officers to work with multiple partners, such as Scottish Water, SEPA, etc, to deliver the actions outlined in the draft strategy. At the moment, there will be no impact to the workforce or need for immediate change, however, there will be changes, such as the recent move away from the landfilling of residual waste, or the introduction of blue-green infrastructure, that will become commonplace on our streets to better manage surface water drainage, that will be noticed by communities across our area. Should the strategy have a direct impact on the workforce in the future...trade unions will be fully consulted and invited to engage over any changes.</p>
0.0.11	Lizzie Rushton University of Stirling (29 March 2025)	<p>I am writing with some reflections/feedback on the Climate Adaption Strategy. I am really pleased to see the inclusion of education as part of this strategy, and the ways in which the strategy incorporates the Lfs Target 2030 Action Plan.</p> <p>I would be very pleased to provide some support / expertise / guidance to the Council building on a year-long programme of professional learning with teachers and educators in Stirling and beyond which I have led with colleagues from Stirling University. This programme has been focused on support teachers and educators to develop professional enquires and take action in their settings focused on climate change and sustainability education.</p> <p>We are starting to draw together some key learnings about the work educators are already undertaking and the further support they need. Education is such a vital part of respond to the climate and nature emergencies and it is great to see the work of Stirling Council in this space.</p>	<p>Noted.</p> <p>Council officers will meet with Professor Rushton to discuss key learning and its potential use in school settings and beyond.</p>
0.0.12	Nature Scot (1 April 2025)	<p>The climate emergency is mentioned quite a bit but there is often little mention of the biodiversity crisis and the combined twin crisis.</p>	<p>This is the role of the Council's 2021 Climate and Nature Emergency (CaNE) Plan. The <a href="#">CaNE Plan</a> has since given rise</p>

		It would be good to see the link between the two and this strengthened throughout the document and action plan.	to key supporting documents, including the Alive with Nature Plan (2022), Regional Energy Masterplan (2023), and now the Climate Adaptation Strategy (2025).
0.0.13	Nature Scot (1 April 2025)	Planning and development do not seem to be mentioned as a key method of delivery for climate adaptation but it could play a major role. NPF4 policy 3 talks about securing positive effects for biodiversity through the planning system so it would be good to see this referred to in the strategy. It is worth noting that NatureScot are currently working on a tool to measure biodiversity on development sites that will help deliver this policy.	Planning colleagues are involved in the Council's Adaptation Working Group, which was instrumental in developing the Strategy draft, and included actions they deemed relevant. The Risk & Opportunities Assessment in Appendix 2 has been used as evidence in the developing LDP.  Noted.
0.0.14	Nature Scot (1 April 2025)	The strategy mentions it will be the main method for the Council to meet the Public Bodies Climate Adaptation Duty, as laid out in the Climate Change (Scotland) Act 2009. This means the Strategy should be subject to an SEA and as part of that we should be consulted on it again.	When applying SEA, it was determined that an SEA Environmental Report was not required for the Climate Adaptation Strategy. The main reason for this determination was that any likely environmental effects were considered to be no more significant than those previously identified and assessed for the Climate and Nature Emergency Plan SEA. The Determination and Statement of Reasons were published in the Stirling Observer in September 2023.
0.0.15	University of Stirling Green Champions (7 April 2025)	The University of Stirling is a key partner in the region's ambition to tackle the Climate and Nature Emergency, being at the forefront of research and initiatives to reach Net Zero by 2040 and being committed to embedding sustainability at the core of everything we do. We invited our 'Green Champions' who are a dedicated working group of academics, staff and representatives from the Student's Union to provide feedback on the consultation. We are aware that you are also in communication with our colleagues in the SIEC along with HNC and Forth Climate Forest regarding the technicalities of the plan.	Noted
0.0.16	University of Stirling Green Champions (7 April 2025)	Some of the graphics are quite blurry and hard to read. Can this be updated?	Graphs with the poorest definition are the highest definition versions made publicly available by the publishers: a link to the original source is given below the graphs to support access to the originals.
0.0.17	University of Stirling Green Champions	Can you confirm which team in Stirling Council has overall responsibility for delivering the plan?	The Sustainable Development & Public Transport Team in the Economic Development, Planning and Climate Change Service.

	(7 April 2025)		
0.0.18	University of Stirling Green Champions (7 April 2025)	The Climate Adaption Strategy is aspirational and not presented in a realistic way. There is a danger of setting high expectations which are unlikely to be achieved. The actions and indicators appear vague and do not provide a shared understanding. It would be helpful to understand how the targets in the plan will be achieved.	<p>The draft Strategy follows a fairly standard, logical approach to strategy structure, as follows:</p> <ul style="list-style-type: none"> <li>• outline the main problem(s) the document aims to address (Main Climate Issues);</li> <li>• provide relevant information and evidence behind that analysis (What the data says and Appendices);</li> <li>• outline where we want to get to (Vision and Outcomes) and activity that needs to take place to achieve that (Objectives, Sub-objectives, Strategic Approach and Governance); and</li> <li>• a delivery plan of actions, responsibilities, timelines and indicators (that will evolve in response to changes in knowledge and availability of resources).</li> </ul>
0.0.19	University of Stirling Green Champions (7 April 2025)	It would be beneficial to see key milestones and targets so that progress against targets can be assessed. A number of the identified indicators currently refer to a “reduction in” which allows no means of assessing whether progress is on target or not.	<p><i>Main document, p 37, Measuring Progress</i> outlines the current challenges in measuring the adaptive impacts from delivering individual actions and the approach taken to deal with these issues until appropriate adaptation indicators can be identified at local authority level.</p>
0.0.20	University of Stirling Green Champions (7 April 2025)	Again, it would be beneficial to see a quantitative analysis of what needs to happen to achieve each desired outcome. There needs to be a mechanism to review and amend actions depending on the success or failure of specific actions.	
0.0.21	University of Stirling Green Champions (7 April 2025)	P 36: The image obscures the footer.	Noted and rectified.
0.0.22	TreeLink Stirling (8 April 2025)	<p>TreeLink Stirling welcomes the opportunity to make comment on the Draft Climate Change Strategy. Overall, we think this draft strategy is excellent and welcome it as an important part of the process toward significant action to prepare the Stirling Council area for the inevitable impacts of the changing climate. TreeLink Stirling is willing to play its part in delivering the actions identified in this strategy when they are consistent with our remit and where we are able.</p> <p>NB: refer to ‘TreeLink Stirling’ in the Strategy, rather than just ‘TreeLink’ (page 6).</p>	<p>Noted</p> <p>Noted and list of stakeholders on p 6 updated.</p>

0.0.23	LLTNPA (8 April 2025)	Loch Lomond and the Trossachs National Park Authority welcome the <b>Climate Adaptation Strategy</b> and look forward to working with Stirling Council on its delivery. We particularly welcome its ambition, clarity, and emphasis on partnership working and nature-based solutions. We note much strategic alignment between our organisations and a shared commitment to work beyond our administrative boundaries.	Noted
0.0.24	LLTNPA (8 April 2025)	We support the inclusion of the National Park Authority as a partner on page 6 of the Strategy and would request that we are identified by our full title including <b>Authority</b> .	Noted and correction made throughout the document.
0.0.25	SFRS (9 April 2025)	<p>I have reviewed the consultation documents and it reads very well. Some areas for consideration.</p> <p>The strategy should include a link to the Wildfire Forum and all the hard work that is being undertaken there to support the land management sector when undertaking the Muirburn code and rewilding projects. It is fair to say that the frequency of large rural fires which can be classed as a wildfire is on a rise, but are still heavily influenced by human interaction on the natural habit, and our practices.</p> <p>Wildfire Forum <a href="#">Home   Scottish Wildfire Forum</a></p> <p>Wildfire Danger assessments <a href="#">Wildfire Danger Assessments   Scottish Fire and Rescue Service</a></p> <p>By adapting how we use our natural environment to be fire aware and conscious of our activity we can significantly reduce the frequency of fire within an environment which is seeing more extreme properties in the form of dry vegetation, longer periods between rain etc.</p> <p>I hope this can be considered alongside your other consultation returns and more than happy to discuss any of these points further with you.</p>	<p>Noted</p> <p>Scottish Wildfire Forum now included in the list of stakeholders on p 6.</p> <p>Council officers will meet SFRS colleagues to discuss.</p>
<b>0.1 Introduction</b>			
0.1.1	University of Stirling Green Champions (7 April 2025)	The climate stripes graphic with text giving context is a strong intro. The first sections give a good description of current context & local examples.	Noted.

		p.6 list of stakeholders could include Macrobert Arts Centre, a long-standing member of Green Arts Initiative they are committed to using their platform to engage audiences with the climate emergency through the arts.	The list is not exhaustive as space doesn't allow inclusion of every possible organisation or group: many would consider the Macrobert Arts Centre a key component of the University of Stirling complex in a list of stakeholders.
0.1.2	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 7 'Our Warming World', final sentence:</i> Extreme heat should specifically mentioned.	Extreme heat added to the list of potential impacts.
<b>0.2 Main Climate Issues</b>			
0.2.1	SFRS (9 April 2025)	<i>Main document, Observed &amp; Projected Changes:</i> With reference to extreme Rainfall and wind events, SFRS will fully support the investigation and opportunities for approaches to community resilience and preparedness. This can be explored as the strategy takes effect.	Noted.
0.2.2	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p10, 'Observed Changes':</i> This section on Climate Issues should note that drought conditions have an impact on soils and that parched soils further increase flood risks if followed by intense rainfall events.	The 'Main Climate Issues' section on 'Observed Changes' outlines the changes observed in our climate in recent history, without going into detailed consequences. The main consequences of those changes are then highlighted in subsequent sections on 'Impacts' and 'Strategic Approach'.
0.2.3	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p11, 'Observed Changes':</i> This section should recognise the particular challenges created by the increasing intensity of rainfall.	
0.2.4	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p17, Projected Changes, Weather extremes:</i> Extreme heat, along with all the other impacts of climate change listed in this section, will affect nature as well as people. This should be reflected in the text.	<i>Main document, p17, Projected Changes, 'Phenology'</i> (further down the page): paragraph specifically outlines some of the impacts on nature.
0.2.5	LLTNPA (8 April 2025)	<i>Main document, p18, 3<sup>rd</sup> para:</i> Noting the reference on page 18 to more locally focused risk assessments being undertaken as adaptation work matures, we would highlight a report we commissioned focusing on <a href="#">National Park-specific climate projections and risk assessment</a> which we believe could be referenced.	Reference now made to the LLTNPA report on p 18 and link included in Appendix 2.
0.2.6	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p20, 'What do we need to do?', 2<sup>nd</sup> para:</i> The recognition of the need for a whole watershed approach is of key importance. However, specific reference is missing in the Action Plan document.	The Action Plan states clearly that it is made up of "initial actions the Council will be taking" to support delivery of the Strategy and that this will evolve.
0.2.7	Individual No. 2 (Engage platform)	<i>Main document, p20, 'What do we need to do?', 2<sup>nd</sup> para:</i>	The whole UK is widely recognised as one of the most nature-depleted countries in the world. This section of the

		Stirling has almost no natural habitats, and if they exist they are in extremely poor condition. It is very concerning that this document would imply otherwise. I would encourage the authors to speak with any ecologist who can explain how truly poor our landscape is for biodiversity. If the council doesn't recognise how bad things are, they will not be able to address the issues at hand.	Strategy is, however, titled “ <i>What do we need to do?</i> ”, with the sub-heading “ <i>Where do we need to get to?</i> ” as it focuses on potential solutions to work towards and is not a statement of the current position.
0.2.8	TreeLink Stirling (8 April 2025)	<i>Main document, p20 What do we need to do? 2<sup>nd</sup> para:</i> TreeLink Stirling strongly agrees with this statement. Building a whole watershed approach requires sound GIS mapping of landscapes, land-uses and existing natural habitats, and the identification of opportunities to enhance and expand natural habitats. Such mapping has been undertaken by organisations such as Green Action Trust, Forth Climate Forest, and others. A collaborative whole watershed approach underpinned by GIS mapping would be an ideal way forward to ensure priority targeted delivery on the ground, and one that TreeLink Stirling would strongly support.	Noted  Noted
0.2.9	TreeLink Stirling (8 April 2025)	<i>Main document, p20 What do we need to do? 3<sup>rd</sup> para:</i> TreeLink Stirling strongly agrees with this statement.	Noted
0.2.10	University of Stirling Green Champions (7 April 2025)	<i>Main document, p21, Climate Distress:</i> Really positive that this is recognised and given space in the strategy.	Noted
<b>0.3 Our Strategy</b>			
0.3.1	Individual No. 1 (Engage platform)	<i>Main document, p 22, ‘Development of the Strategy’, 2<sup>nd</sup> bullet:</i> In relation to Food and Agriculture, please can you identify what research, documents and data the members of the Advisory Group, and the Working Group are using in relation to understanding the impact of animal agriculture as a major contributor to GHG emissions, acidification, eutrophication and the Climate and Nature crisis? Do the group members accept that a drastic reduction in meat and dairy consumption and transitioning to a plant based food system is essential if we are serious about tackling the Climate and Nature Crisis?	<i>Main document, p 41, Key References and Documents listed in Appendix 2.</i>  Scotland’s <a href="#">3<sup>rd</sup> National Adaptation Plan</a> outlines the changes to agriculture the Scottish Government anticipates will be needed for the sector to adapt to climate change.

		<p>Locally and globally, a plant based system would use less land, less water, reduce deforestation, improve biodiversity by freeing up land for nature restoration, and improve health outcomes.</p> <p>A plant based food system is a more efficient and sustainable system to produce the calories and protein to feed the human population. (this is accepted by the world's leading climate scientists and ecologists.) Growing plants to feed to animals to feed to humans is inefficient, polluting and unsustainable.</p> <p>Have the council considered how much farmland around Stirling is currently being used to grow animal feed to feed factory farmed animals (e.g. Dairy cows), how much soy animal feed is imported into our farms, how farmers could be supported to adapt to growing crops to supply a plant based food system ?</p> <p>Have members of the group reviewed the Dimpleby Report and the Dasgupta Review in relation to the National Food Strategy?</p>	<p>Noted</p> <p>Farming and agricultural policy are not local government functions but the Council recognises farming and land-owning groups as being critical partners in working towards adapting successfully to the impacts of climate change.</p> <p>Many members are aware of these and other works critical of currently dominant economic models.</p>
0.3.2	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p 23, 'Strategic &amp; Legal Context':</i></p> <p>Stirling Council are a signatory to the Forth Climate Forest Concordat. This document sets out Stirling Council's commitment to tree and woodland expansion to help tackle climate change and, as such should be referenced. Additionally, a new Tree and Woodland Strategy is currently being written by Stirling Council, which will have much greater relevance than the current Forest and Woodland Strategy, referenced in the Appendix.</p>	<p>Reference to the Forth Climate Forest (FCF) Concordat has been added to Appendix 2.</p> <p>Appendix 2 refers to documents current at the time of publication but does not refer to documents in development (such as a Tree &amp; Woodland Strategy).</p>
0.3.3	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p 24, Our Plan for Action, Vision:</i></p> <p>The vision could be shortened to make it more impactful. It does lead into a good set of outcomes and objectives.</p>	<p>To satisfy differing opinions on whether a vision should be short and pithy or paint a longer, descriptive picture, the Vision has a stand-alone short sentence '<i>A well-prepared, collaborative, and climate-resilient Stirling</i>' backed up by some longer, explanatory sentences.</p>
0.3.4	Individual No. 1 (Engage platform)	<p><i>Main document, p 24, Our Plan for Action, Outcomes:</i></p> <p>More investment in informing us as members of our local and global community to increase the level of understanding of the causes and risks of Climate and Nature breakdown. A Stirling Council 'tool kit' designed to support us all to make the right consumer choices, could be helpful.</p> <p>Re Resilient buildings and Infrastructure - a recent Stirling Council consultation on the budget cuts included the possibility of reducing money allocated for buildings maintenance. Is the Gov funding</p>	<p>Noted</p> <p>There are limitations on all government funding in the current financial situation.</p>

		guaranteed for investing in buildings and Infrastructure for the severe weather events that we will experience because of Climate Change?	
0.3.5	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 24, Our Plan for Action, Objectives:</i> The scope of the objectives is narrowed as you move to the actions within the Action Plan. Insights and priorities outlined in the strategy are not always present as you move through the objectives and actions.	The Strategy is intended to cover a 10 year period whereas the Action Plan states clearly that it is made up of <i>“initial actions the Council will be taking”</i> to support delivery of the Strategy and that <i>“this will evolve in response to changes in legislation, guidance, resource availability, understanding, and knowledge”</i> .
0.3.6	University of Stirling Green Champions (7 April 2025)	There should be included a focus on actions to prevent contributions to climate change. For example, ensuring all public and private buildings are energy efficient and where appropriate have renewable energy production methods in built in buildings. Or, ensuring that no public insurance is provided by companies that insure fossil fuel companies, or that no publicly managed finance (such as the Falkirk pension fund) have investments in fossil fuels. While it is necessary to adapt and be resilient in the face of climate breakdown, there also needs to be a focus on preventing further contributions to the climate crisis.	The focus of this Strategy is Climate ADAPTATION, i.e. planning and preparing for the IMPACTS of our changing climate. This comment refers to the CAUSES of climate change, i.e. Climate MITIGATION, which is the main focus of the Council’s Climate and Nature Emergency Plan, internal Carbon Reduction Plan, work with Scotland’s Climate Intelligence Service and Climate View platform, and annual Public Bodies’ Climate Change Duties annual reporting. The main Strategy document does however make the point that: <i>“there are limits to the amount of heat and associated impacts we will be able to adapt to”</i> , and that: <i>“a rapid reduction in emissions to near zero is by far the best adaptive response”</i> (final sentence on page 9).
0.3.7	University of Stirling Green Champions (7 April 2025)	A general call for action seems to be missing in the strategy, as there are links to address Climate Distress it would be helpful to include a section on ‘what action can you take now’ and/or ‘how to get involved implementing the strategy’.	The document takes a strategic approach to provide a broad overview of the current position and potential solutions. The guidance suggested is the kind of detailed material which could emerge from delivering actions.
0.3.8	LL&TNPA (8 April 2025)	We would ask that the current <a href="#">National Park Partnership Plan</a> is included in the ‘Strategic & Legal Context’ on page 23	Noted: diagram on p23 updated.
<b>1. Outcome 1. Awareness and understanding of risks, opportunities &amp; adaptation actions</b>			
<b>1.0 General Comments</b>			
1.01	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 26, Adaptation Framework, Outcome 1:</i> We, University of Stirling and SIEC, would welcome the opportunity to discuss how we can best work with the Council to achieve the objectives under this outcome particularly around research, monitoring (including development of indicators and systems) and raising awareness.	Council officers will meet relevant colleagues to discuss.

1.02	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 26, Adaptation Framework, Outcome 1:</i> This section should include a commitment to record and share action that is taking place by the range wide of groups and individuals that are active within the Stirling Council area.	Public Bodies Climate Change Duties reporting is already required for relevant public bodies active in the Stirling Council area, which are published <a href="#">on-line</a> . Keeping a record of the wide range of relevant activity taking place across the whole Council area could be undertaken by a regional adaptation partnership or organisation whose remit closely aligns with such activity, such as Forth Valley Climate Action Hub.
1.03	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 27, Strategic Approach, Objective 1:</i> To build on my previous comment, there should be a commitment to recording actions have been taken or are planned by all relevant parties.	
<b>1.1 Undertake research</b>			
1.11	Historic Environment Scotland (HES) (4 April 2025)	In order to support the delivery of Objective 1.1 and the Action Plan, we wish to highlight that HES has undertaken extensive and pioneering work on climate change adaptation and the historic environment. 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 <a href="#">Climate Change Impacts (HES, 2019)</a> and the <a href="#">Use and Adaptation of Listed Buildings (HES, 2019)</a> and technical information on <a href="#">Guide to Energy Retrofit of Traditional Buildings</a> (HES 2023).	Noted.
<b>1.2 Promote and build awareness</b>			
1.21	TreeLink Stirling (8 April 2025)	TreeLink Stirling strongly agrees with this statement. Building business and community understanding and appreciation of these wider benefits and the value (financial and other value returns) of nature-based solutions to them, is a key part of a climate adaptation strategy and building interest and momentum for delivery on the ground.	Noted
<b>1.3 Encourage new and ongoing joint planning and response</b>			
1.31	TreeLink Stirling (8 April 2025)	TreeLink Stirling is a growing community-based charity run by volunteers who recognise the value of trees for people, biodiversity and the environment. We wish to work collaboratively with other organisations in Stirling to bring about a rapid, positive response to the climate and ecological crises. Joint planning is a crucial step toward an effective delivery response. TreeLink Stirling is willing to be involved in Joint Planning as capacity allows.	Council officers will meet with TreeLink Stirling to discuss.

1.4 Promote and support engagement and participation			
1.41	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 26, Adaptation Framework, Sub-objective 1.4:</i> Is there a specific target audience for your engagement and participation activities? Is this clarified in the action plan or elsewhere in the Strategy?	The Council's internal Engagement & Consultation Plan for the Adaptation Strategy identifies key stakeholders and a more detailed stakeholder list, which informed the draft Strategy's consultation distribution list. The process largely follows the guidance and templates in Adaptation Scotland's <i>Adaptation Benchmarking Toolkit</i> .
1.42	TreeLink Stirling (8 April 2025)	TreeLink Stirling is keen to work with the Council where our remits align. There is much that TreeLink Stirling can do to assist the Council in pursuit of its own objectives and targets for trees, woodlands and nature-based solutions. However, our experience to date is that the Council finds it very difficult to work collaboratively with organisations like TreeLink Stirling. There needs to be a change in organisational culture and attitude to control risk within the Council to open up greater opportunities for all involved.	Council officers note the concerns raised and will continue to work towards developing effective partnerships. The role of the new Nature Restoration Officer will be key to improving the specific collaborative work referenced, as is work to develop a 'land bank' of sites identified as suitable for tree planting.
2. Outcome 2. Resilient buildings and infrastructure			
2.0 General Comments			
2.0.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, pp 26 &amp; 29, Adaptation Framework, Outcome 2:</i> This should include reference to critical green and blue infrastructure.	Reference included in the narrative, especially sub-objective 2.4 " <i>Manage flooding, shade &amp; shelter</i> ".
2.0.2	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 26, Adaptation Framework, Objective 2:</i> The issue of water scarcity and potential disruption of water supplies should be explicit within this objective. Currently, water availability is highlighted on p13 of the Appendices but not referenced in the actions.	Sub-objective 2.4 updated to <i>Manage flooding, drought, shade &amp; shelter</i> . Existing references to " <i>water efficiency measures and appliances</i> " and " <i>increased rainwater capture to reduce the need for mains water in green spaces</i> " strengthened with inclusion of " <i>detention ponds</i> " and " <i>water scarcity</i> ". The Action Plan is made up of <b>initial</b> actions, with 2.1.3, 2.1.5 and 2.1.6 referring to production of briefs, project scopes and building management guidance that include " <i>wider climate adaptation considerations</i> ", but without listing <b>ALL</b> issues highlighted throughout the Strategy.
2.0.3	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p29, Outcome 2, first sentence:</i> This section focusses on grey infrastructure and does not recognise that our green and blue infrastructure are just as critical.	The structure loosely follows the UK CCRA3 approach to breaking down inter-connected considerations into manageable groupings, with G&BI the focus of Outcome 3. Outcome 2 does however include: " <i>prioritising green</i>

			<i>infrastructure wherever applicable...</i> (2 <sup>nd</sup> para on p 29), while sub-outcome 2.4 contains more on B&GI.
2.0.4	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p29, Sub-objective 3.4:</i> Peatlands should be specifically mentioned as the restoration of these areas should form a key element of your strategy.	In addition to existing text in the Action Plan and Appendix 1, the main narrative has been edited to reference peatland more overtly.
2.0.5	Nature Scot (1 April 2025)	It would be good to see a mention in the strategy of the potential in the area for coastal realignment and its potential role in climate adaptation.	<i>Main document, p18, 'Climate Risks and Vulnerabilities', 1<sup>st</sup> paragraph:</i> "With the prospect of more frequent extreme weather events, we need to be able to prevent, protect and recover from such events. This means moving people and assets out of harm's way through better planning and investment decisions."
2.0.6	Nature Scot (1 April 2025)	It would be good to go expand the information on coastal flooding. The strategy acknowledges it will have an impact on the area but it does not provide any detail on what the issue is, the scale of it or what any potential solution might be.	The level of detail suggested is seen more as a role for Flood Risk Management Plans and work under Objective 1 to " <i>Develop and maintain a clear understanding of climate impacts, risks, opportunities, and adaptation actions</i> ". While coastal flooding is an issue for the Forth estuary, with the river tidal to just west of the M9 motorway, the main flood risks identified for Stirling in the Forth Local FRMP, 2022-28 are from river and surface water flooding.
2.0.7	Nature Scot (1 April 2025)	Flooding is given as a very broad mention. Examples and cases of floods given in the plan include river and surface water. There should be better mention and explanation of coast included in this (see point above under coastal flooding).	The climate risks and opportunities tables in Appendix 1 identify 5 risks from coastal flooding, with urgency scores as follows: N10-saltwater intrusion to aquifers and agricultural land (Watching brief), N17-coastal flooding impacts on coastal species & habitats (More action needed), H4-sea level rise impacts on coastal communities (Watching brief), I3-coastal flooding and erosion on infrastructure services (Further investigation), B2-coastal flooding impacts on coastal businesses & infrastructure (More action needed).
2.0.8	Nature Scot (1 April 2025)	It would be good to see a break down in the strategy of the 3 types of flooding (mentioned above), the concerns for each as well as looking at their combined impact.	
2.0.9	Nature Scot (1 April 2025)	The section on the management of the entire watershed in relation to flooding needs to be expanded. It needs to explain how the management of the watershed will help alleviate some of the pressures of flooding further down the catchment e.g. through riparian planting, restoring meanders etc.	<i>Main document, p 20, Main Climate Issues:</i> "This requires a <b>whole watershed approach that maximises the ability of the landform and vegetation to slow down the flow of water</b> , store it during periods of scarcity, and cool down urban areas".
2.0.10	Nature Scot (1 April 2025)	It would be good to see a link to the SEPA flood risk maps within the strategy as this would help illustrate the issues in a local context.	Link to SEPA's long-term flood risk map now included in Appendix 2, p 28, under ' <i>Flood Risk Management Plan</i> '.

2.0.11	TreeLink Stirling (8 April 2025)	TreeLink Stirling is supportive of the prioritisation of green infrastructure as part of the design solutions for more resilient buildings and other grey infrastructure.	Noted
<b>2.1 Protect buildings and historic assets</b>			
2.1.1	Historic Environment Scotland (HES) (4 April 2025)	<p>A significant proportion of Stirling’s buildings and infrastructure are traditional or historic. We therefore welcome that the risks of climate change on the historic environment are identified in the strategy and action plan.</p> <p>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. We therefore welcome that Objective 2 of the Climate Adaptation Framework of the strategy identifies that increased resilience of buildings and infrastructure to climate change will help protect historic assets and buildings. The historic environment therefore provides a key opportunity to help reduce carbon emissions and the impacts of climate change.</p>	<p>Noted.</p> <p>Noted.</p>
<b>2.2 Resilient and responsive transport</b>			
2.2.1	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Main document, p 29, Sub-objective 2.2:</i></p> <p>This section should include reference to trees in car parks and areas of hard standing to provide shade and shelter and reduce the impacts associated with heat and rainfall.</p>	Text edited to include increased use of trees in list of actions
<b>2.4 Manage flooding, drought, shade &amp; shelter</b>			
2.4.1	TreeLink Stirling (8 April 2025)	<p>2<sup>nd</sup> para:</p> <p>TreeLink Stirling supports this sub-objective. It will be necessary for other Council plans and strategies to cross-reference this sub-objective (e.g. City Centre Flood Study).</p> <p>Street trees are an important climate adaptation asset but seem to be viewed as an expensive liability by many parts of the Council. A new approach to trees in urban areas needs to be found, built upon a solid understanding of the long-term benefits of urban trees and high-level support for an increase in urban tree planting, stronger protection measures for existing urban trees and a willingness to collaborate with organisations like TreeLink Stirling.</p>	Noted.

		Urban trees provide value to local authorities and others both in financial terms and other value returns as highlighted well in this sub-objective. Recognising this value can turn urban trees into a local authority asset rather than a cost line.	Noted: the points highlighted are ongoing awareness-raising issues.
<b>3. Outcome 3. Protected and enhanced natural environment</b>			
<b>3.0 General Comments</b>			
3.0.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 31, Outcome 3:</i> Peatlands should be specifically mentioned as they are key to this strategy.	In addition to existing text in the Action Plan and Appendix 1, the main narrative has been edited to reference peatland more overtly.
3.0.2	Nature Scot (1 April 2025)	There is no mention of peatland within the strategy. The only time it is mentioned is in the glossary of the main strategy document under carbon sequestration Would be good to see mention to the area having internationally important peatlands like Flanders and the importance of peatlands for carbon storage and tackling the nature and climate crisis.	
3.0.3	Nature Scot (1 April 2025)	There is no mention to non-native invasive species within the strategy and we recommended INNS is included for the following reasons INNS degrade habitats and reduce both species and habitats resilience and level of adaptation to climate change which can lead to habitat fragmentation and isolation of species. This will have a detrimental impact on biodiversity in general but also any nature networks or nature based solutions that are in place. INNS can degrade riverbanks and increase erosion leading to a loss of soil and increased flood risk. Giant Hogweed is a major issue in the area and has health and safety risks to humans and can also prevent safe access to areas for recreation.	Text edited to include reference to INNS in Sub-objective 3.1
3.0.4	Individual No. 1 (Engage platform)	<i>Main document, p 26, Sub-objectives 3.2 and 3.3:</i> Does the council recognise that the annual release of millions of non-native, intensively reared gamebirds (pheasants) into our countryside, and the driven grouse shooting businesses on our hills, have a detrimental impact upon local ecosystems ( both plant and animal species), and cause biodiversity loss. Locally, hundreds of pheasants wander off estates during the shooting season. The omnivorous diet of these birds includes plant	Noted

		<p>shoots, seeds and seedlings ,invertebrates, amphibians, ground nesting bird eggs and fledglings.</p> <p>It is estimated that the game bird shooting industry is responsible for persecuting and killing over 250,000 native wild animals in Scotland every year, and for contaminating our land with thousands of tons of lead shot.</p> <p>It is unacceptable that businesses that persecute our wildlife, negatively impact biodiversity, release millions of a non-native species (and throughout a Bird Flu crisis), and pollute our land with lead, in order to shoot birds for fun, are permitted to continue with this practice.</p> <p>Please read the research conducted by REVIVE coalition</p>	
	TreeLink Stirling (8 April 2025)	<p><i>Main document, p 31, Outcome 3: Protected &amp; enhanced natural environment</i></p> <p>TreeLink Stirling is very supportive of this statement.</p> <p>Continued support by the Council of initiatives like the Forth Climate Forest and the work of the Forth Rivers Trust will be important to help deliver this outcome.</p> <p>Initiatives such as the Riverwoods Programme, a partnership led by the Scottish Wildlife Trust, can also add benefit.</p>	Noted
<b>3.1 Make space for nature</b>			
3.1.1	Nature Scot (1 April 2025)	<p>Connectivity gets a mention as blue &amp; green corridors (should be nature networks) but only once and the importance of these networks to climate adaptation is not detailed. It would be good to see an explanation of this being key to species and habitat resilience and the services they provide. It would also be good to see reference to NPF4 and nature networks.</p>	<p><i>Outcome 3. P31, Protected and Enhanced Natural Environment:</i> Supporting text in the introductory paras provide some of the explanation sought, where the text has now been edited to replace 'migration corridors' with 'nature networks' (but there is no mention of blue &amp; green corridors in Section 3, pp 31-32).</p> <p>NPF4 is referenced in the <i>Strategic &amp; Legal Context</i> section on p 23 and in more detail in Appendix 2.</p>
3.1.2	TreeLink Stirling (8 April 2025)	TreeLink Stirling supports this sub-objective.	Noted
<b>3.2 Maintain healthy soils</b>			
3.2.1	Nature Scot (1 April 2025)	<p>Healthy soils are mentioned as a main theme yet there is no mention to peatland or carbon rich soils (at least a carbon rich soil mention would be good if not both).</p>	<p><i>Main Strategy document, p 31, Sub-Objective 3.2. Maintain healthy soils:</i> "As well as being a vital medium for growing much of our food, soil purifies water, protects against flooding, combats drought, captures and <b>stores vast</b></p>

			<p><b>amounts of carbon</b>, and is needed to support green, blue and grey infrastructure.”</p> <p><i>Action Plan, Action 1.2.7: “RAISE AWARENESS of the importance of <b>peatlands</b> in tackling the climate emergency”</i></p> <p><i>Sub-objective 3.4: “Protect wetlands, watercourses, and coastlines (includes <b>peat</b>)”.</i></p> <p><i>Action 3.4.2: “Work in partnership to RESTORE and reduce water flow through <b>peat bogs</b>.”</i></p> <p><i>Appendix 1, p5, N5. Natural carbon stores: “Targeted actions to restore degraded carbon stores, especially <b>peatlands</b>.”</i></p> <p>While the focus of the Strategy is on adapting to the <u>impacts</u> of climate change, rather than tackling the <u>causes</u>, the main narrative has been edited to reference peat more overtly.</p>
<b>3.3 Protect and expand tree and woodland habitat</b>			
3.3.1	Nature Scot (1 April 2025)	<p>It would be good to refer to tree health in the plan and actions. Tree pathogens, disease and pests are already prevalent in Scotland and in the Stirling Council area. Their spread and its impact need to be addressed. Ash die back is one of the main threats with Dutch Elm disease increasing. Engagement with ourselves, Scottish Forestry and Forest Research could really help the Council understand the local picture and what data is available. It would also be good to see an Ash die back management plan for the area and to see this included as an action within Climate Adaptation Strategy action plan. West Lothian Council have done some work on this as an example <a href="https://westlothian.gov.uk/article/75192/Ash-Dieback-Disease">https://westlothian.gov.uk/article/75192/Ash-Dieback-Disease</a></p>	<p>Supporting text edited to include tree protection and promotion of tree health.</p> <p>Council officers will meet relevant colleagues to discuss.</p> <p>An Ash die back Plan is more closely-aligned with the Council’s Alive with Nature Plan and delivery.</p>
3.3.2	Nature Scot (1 April 2025)	<p>Tree health can also be linked with storm damage as it likely to cause more damage so it should not be ignored.</p>	<p>Supporting text edited to include tree protection and promotion of tree health.</p>
3.3.3	TreeLink Stirling (8 April 2025)	<p>TreeLink Stirling strongly supports this sub-objective and is willing to play its part in its delivery.</p> <p>The Sub-objective includes ‘protect’ as well as ‘expand’. The supporting text for the objective focusses on ‘expand’, but ‘protect’ is vital and is an important part of allowing expansion of tree cover. If trees are lost/felled at a faster rate than tree planting, then tree</p>	<p>Noted.</p> <p>Supporting text edited to emphasise <b>protection</b> and expansion of tree cover.</p>

		<p>cover will decrease. Greater protection of trees (particularly in urban areas and new developments) is paramount.</p> <p>Urban tree loss continues at pace (due to storms, garden fellings, new infrastructure and built developments, bad tree surgery practice, disease) with little in the way of tree replacement. Tougher tree protection measures must be considered.</p>	<p>Trees in urban areas that are not on Council-owned land can be protected by Tree Preservation Orders (TPO's) or Conservation Area status, these only however cover a limited area of land. Consequently the majority of urban trees are not formally protected and would require no permission to be removed or have tree works undertaken. There is also no obligation to replace trees that are removed.</p> <p>The promotion of TPO has to be justified on several grounds, e.g. condition, remaining longevity, relative public visibility and significance. It does however involve significant staff time and resources and is usually only undertaken when there is a known threat to remove trees. It is therefore not practical to generally extend protection to all trees and woodlands.</p> <p>Trees in woodlands and open spaces require separate 'Felling Permission' from Scottish Forestry, if more than 2 mature sized trees are to be removed per calendar quarter.</p> <p>The impact of new development on established trees and woodlands is carefully considered at the planning application stage.</p>
<b>3.4 Protect wetlands, watercourses, and coastline (includes peat)</b>			
3.4.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, pp 26 &amp; 32, Sub-Objective 3.4:</i> Peatlands should be specifically mentioned as the restoration of these areas should form a key element of your strategy.	The main narrative has been edited to reference peatland more overtly.
3.4.2	TreeLink Stirling (8 April 2025)	TreeLink Stirling supports this sub-objective. Continued support by the Council of initiatives like the Forth Climate Forest and the work of the Forth Rivers Trust will be important to help deliver this outcome.	Noted.

		Initiatives such as the Riverwoods Programme, a partnership led by the Scottish Wildlife Trust, and FORTH2O led by the University of Stirling will also be of assistance.	
<b>4. Outcome 4. Engaged and supported communities</b>			
<b>4.0 General Comments</b>			
4.0.1	University of Stirling Green Champions (7 April 2025)	Should there be more work on encouraging individuals / households to stockpile 72 hours of supplies in case of climate disaster? This reflects increasing calls from EU, UK experts and environmental activists for more individual resilience and responsibility, as well as community and national resilience. Stronger resilience at individual level would lessen the strain on local authority response.	Encouraging individuals and households to stockpile 72 hours of supplies is a step towards climate disaster preparedness. By doing so, the pressure on local authorities can be alleviated while strengthening both community and national resilience. While stockpiling supplies can be beneficial, it should be part of a broader strategy that includes efforts at the community and national levels. Individual preparedness is most effective when complemented by strong local government crisis management and community resilience planning. It is also important to focus on equitable adaptation measures to ensure that vulnerable groups are not left behind. Encouraging the stockpiling of supplies can be a practical step towards enhancing resilience. However, investing in community-level resilience planning and ensuring local authorities have the resources needed to respond to disasters is equally crucial. A combined approach will be more effective in mitigating the impacts of climate disasters.
<b>4.1 Ensure prepared individuals and communities</b>			
4.1.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 33, Sub-objective 4.1:</i> We would like to see this action go further and commit to ensuring that communities have a much greater level of understanding and autonomy that enables them to take action to create locally adapted places.	Noted. Understanding, engagement and participation are key aspects of Objective 1.
<b>4.2 Promote health and wellbeing</b>			

4.2.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Main document, p 34, Sub-objective 4.2, 2<sup>nd</sup> para:</i> This paragraph should have a wider focus than just public open spaces. Our entire urban environment needs to be designed to deal with these issues.	To keep the document concise and avoid constant repetition, different sub-objectives tease out different aspects of adaptation action – in this instance the important health & wellbeing aspects of including blue & green infrastructure close to where people live.
4.2.2	TreeLink Stirling (8 April 2025)	TreeLink Stirling supports this sub-objective. TreeLink Stirling would wish to see efforts to integrate blue and green infrastructure for health and well-being benefits into neighbourhoods of most need (i.e. where there is significant risk and most vulnerable communities). Similarly, we would wish urban tree planting and tree protection to focus on areas of greatest need (as defined by the Woodland Trust’s Tree Equity analysis). Opportunities for people in local communities to volunteer and build skills in for example, growing and planting trees, removing invasive species, or helping create urban nature greenspaces - is another way to build peoples understanding and appreciation of blue/green features and nature-based solutions – and improve health and well-being of people and their surroundings. Organisations such as TreeLink Stirling and Forth Rivers Trust provide such volunteering opportunities, and would therefore be excellent partners for the council to work and collaborate with.	Noted.  Noted.  Noted.  Council officers will meet with TreeLink Stirling colleagues to discuss. The role of the new Nature Restoration Officer will be key to this work.
<b>4.3 Build resilience in the local economy</b>			
4.3.1	TreeLink Stirling (8 April 2025)	TreeLink Stirling supports this sub-objective.	Noted
<b>4.4 Encourage food security and resilient supply chains</b>			
4.4.1	Nature Scot (1 April 2025)	Allotments and local food growing are not mentioned in main strategy even in the food security section. There are appropriate actions in the plan which relate to this but it would be good to have that text in the strategy to make the link.	<i>Main document, p 34, Encourage food security and resilient supply chains: “A strong <b>local</b> food sector, with more food produced <b>locally</b>, will be more resilient and support greater food security through access to safe, healthy and affordable food.”</i>
<b>5. Our Action Plan</b>			
<b>5.0 General Comments</b>			

5.0.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Programme of Improvement, Introduction:</i> We would like to see a budget committed to the delivery of this strategy.	The Action Plan highlights that current actions are being delivered using largely existing resources but that this will evolve in response to availability of resources.
5.0.2	University of Stirling Green Champions (7 April 2025)	The timescales in the Action Plan are vague i.e. short, medium and long term. For short term for example is this 1 – 2 years from the final published version of the plan?	The timescales take account of the number of relatively new areas of work and associated actions where processes, funding or agreement have still to be established. A definitive end date could not therefore be determined for many actions. All action timescales were estimated from the point of inclusion in the draft but, given consultation and internal approval processes, some actions may be complete by the time the draft is agreed at Committee.
5.0.3	University of Stirling Green Champions (7 April 2025)	Can further clarity be provided on how the Action Plan is going to be tracked and monitored? Are there any other plans to share or publicise progress to external organisations/ local community other than PBCCD reporting?	Given the size of the document (and other, expanding requirements within PBCCDs reports), annual reporting is currently deemed sufficient for monitoring purposes.
5.0.4	University of Stirling Green Champions (7 April 2025)	<i>Protect buildings and historic assets:</i> Seems to focus on Council infrastructure. The plan repeatedly notes the need for community wide stakeholders to work together, it would be helpful to identify support and info sharing for all to protect their buildings in this section.	The Action Plan also states that the tables “ <i>contain initial actions the Council will be taking to support delivery of our Adaptation Strategy using largely existing resources</i> ” and that “ <i>The Action Plan will ... evolve through engagement with partner organisations and the wider community</i> ”.
5.0.5	LLTNPA (8 April 2025)	We would also like to provide a response on the draft <b>First Action plan</b> , of which we are supportive in principle. We welcome that the Action Plan will evolve in response to developing partnerships and offer the following (not exhaustive) to support that iteration. <ul style="list-style-type: none"> <li>• We would be happy to meet to discuss and develop the Action Plan with regards to the actions and role of the National Park Authority should this be useful as you finalise and enact the documents.</li> <li>• We will be endeavouring to create a National Park Authority Adaptation Plan this financial year and beyond it an Adaptation Plan for the National Park as a whole. This would be cross-boundary with a Stirling-wide Adaptation Plan</li> <li>• We would suggest that it is an omission that peatland restoration is not referred to alongside woodland creation as an important nature-based solution. This relates to</li> </ul>	Noted  Council officers will meet LLTNPA colleagues to discuss.  Noted.  Council officers will meet LLTNPA colleagues to discuss.

		<p>several actions, particularly in section 3, and we could draw on our established <a href="#">peatland restoration programme</a> to help refine the actions as drafted.</p> <ul style="list-style-type: none"> <li>• Our <a href="#">Future Nature programme</a> (of which peatland restoration is part) may also help to support / supplement actions within the draft. As above, we could draw on that to help refine the actions as drafted.</li> <li>• We welcome our role as a Planning Authority in the relevant actions and, as with the above, would welcome the opportunity to further refine these.</li> </ul>	<p>Noted.</p> <p>Council officers will meet LLTNPA colleagues to discuss.</p>
5.0.6	TreeLink Stirling (8 April 2025)	<p>Programme of Improvement, p 36: TreeLink Stirling wishes to build on the existing collaboration we have established with the Council to turn this strategy into effective action. As previously stated, the experience to date hasn't been easy with several 'knock-backs' from the Council. TreeLink Stirling has had to be tenacious and put consistent effort into the relationship to make positive progress. The existing relationship is embryonic and needs to be allowed to grow to achieve 'positive collaboration'.</p>	<p>Noted.</p> <p>By definition, 'positive collaboration' needs to be reciprocal. Council officers will continue to strive towards developing effective partnerships for the benefit of all. The role of the new Nature Restoration Officer will be key to the specific work referenced.</p>
<b>5.1 Objective 1. Develop and maintain a clear understanding of climate impacts, risks, opportunities, and adaptation actions in collaboration with others</b>			
5.1.1	LLTNPA (8 April 2025)	<p><i>Action 1.3.3:</i> Planning colleagues noted that action 1.3.3. in particular would benefit from a clarification of our role and application in rural settings.</p>	<p>Council officers will meet LLTNPA colleagues to discuss.</p>
<b>5.2 Objective 2. Ensure the resilience of our buildings and critical infrastructure to local climate impacts. Sub-objective 2.4 Manage flooding, shade and shelter</b>			
5.2.1	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Action 2.4.1:</i> The Action Plan should also seek to ensure new developments achieve a minimum 20% tree canopy cover to provide shade and shelter. This target is included in the Stirling Council Alive with Nature Plan.</p>	<p>National Planning Framework 4 supports development proposals that are sited and designed to adapt to current and future risks from climate change (Policy 2 Climate mitigation and adaptation), enhance biodiversity (Policy 3 Biodiversity) and enhance, expand and improve woodland and tree cover (Policy 6 Forestry, woodland and trees).</p> <p>Primary Policy 10: Forestry, Woodlands and Trees of the adopted Stirling Local Development Plan (LDP) also seeks to expand woodland cover and, where practicable, secure</p>

			<p>establishment of new woodland in advance of development, particularly in association with larger scale development proposals.</p> <p>Stirling Council is currently preparing an updated LDP and will be commencing a call for sites and ideas stage in late summer 2025. If the suggestion for a minimum 20% tree canopy within new developments is put forward at this stage then this could be formally considered for potential inclusion in the emerging proposed plan as a locally specific policy</p>
5.2.2	Unidentified User (Engage platform)	<p><i>Action 2.4.2:</i> Introduce a presumption against development in any area which is now or under medium to high likelihood long term climate change scenarios is subject to flooding risk</p>	<p>Primary Policy 5: Flood Risk Management of the adopted Stirling Local Development Plan states the Council will take a precautionary approach to flood risk from all sources and development should be avoided in locations at medium to high flood risk or where it would lead to an increase in the probability of flooding elsewhere.</p> <p>National Planning Framework 4: Policy 22 - Flood risk and water management, states Local Development Plans should strengthen community resilience to the current and future impacts of climate change by avoiding development in areas at flood risk as a first principle.</p> <p>These established safeguards therefore address the concerns raised in the comment</p>
5.2.3	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Action 2.4.6:</i> This action plan should also seek to ensure that appropriate blue and green infrastructure is retrofitted into existing urban areas too.</p>	Agreed: a number of actions seek to do this.
5.2.4	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Action 2.4.7:</i> The assessment in 3.1.1, to identify tree planting opportunities, is relevant to this action as well Forth Climate Forest can also assist</p>	<p>Noted</p> <p>Action Plan updated to include FCF as a partner</p>
5.2.5	SIEC/HNC/FCF Joint response (Engage platform)	<p><i>Action 2.4.8:</i> The assessment in 3.1.1, to identify tree planting opportunities, is relevant to this action as well. Forth Climate Forest can also assist.</p>	<p>Noted</p> <p>Action Plan updated to include FCF as a partner</p>

		The data generated through the Forth Climate Forest Urban Tree Map, which has been shared with Stirling Council, can be used to monitor changes in the number of urban trees and urban tree canopy cover.	Noted
5.2.6	Individual No. 2 (Engage platform)	<i>Action 2.4.8:</i> This is good. Compared to London, which feels very leafy, Stirling has a shockingly low urban tree population. The alive with nature plan is a terrible document that does more harm than good. The fact that the now abandoned 'River Park' plans (which included river taxis, water sports areas, play parks, fishing areas, new bridges, inland marinas etc) were included in an 'Alive with Nature' plan shows how out of touch the council are when it comes to biodiversity. None of these plans were created with ecologists, and they would have been disastrous for the wildlife living at places like the Kildean Loop. The Alive with Nature plan should be scrapped and rewritten, with ecologists and rewilding experts at the centre of the decision making process.	Noted  People are key components of both urban and rural environments and require positive experiences to develop a long-term interest in and enjoyment of the natural world to support ongoing protection and enhancement activities.  The AWN Plan was developed jointly by in-house and external ecologists (including from Nature Scot and SEPA).
5.2.7	LLTNPA (8 April 2025)	<i>Action 2.4.8:</i> Planning colleagues noted that action 2.4.8 in particular would benefit from a clarification of our role and application in rural settings.	Council officers will meet LLTNPA colleagues to discuss.
<b>5.3 Objective 3. Protect and enhance our natural environment</b>			
5.3.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 3.1.1:</i> It is important to ensure that this action includes all Council owned or managed land. Forth Climate Forest has already undertaken an assessment of all of Stirling Council's land to identify tree and woodland planting opportunities. We would be happy to work with the Council on delivery. Forth Climate Forest can also assist	Agreed  Noted  Action Plan updated to include FCF as a partner
5.3.2	Individual No. 2 (Engage platform)	<i>Action 3.1.1:</i> Tree planting and wildflowers, whilst well intentioned, are at most a sticking plaster solution for a gaping wound of a problem. The primary driver behind the biodiversity crisis is habitat loss, and with the rapid development and urbanisation going on around Stirlingshire this is only getting worse. We need large scale habitat	The focus of this Strategy is <b>adapting to climate change impacts</b> . In this context, green infrastructure, especially urban trees, has a critical role in ameliorating the impacts of higher temperatures and rainfall in built up areas. The nature crisis is an additional, over-lapping issue that requires restoration work to take place wherever possible

		restoration, not just a handful of wildflower meadows and young trees being planted. Flowery verges or hedgerows might make us feel good, but they are not an ecosystem and do not compensate for the vast amount of land being eaten up for housing and industry.	at every scale available to provide the patchwork of habitats, nature networks, and connectivity needed to re-build nature's resilience. Trees, hedgerows and wild flower meadows are all key components of diverse habitats and are critical building blocks in supporting recovery.
5.3.3	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 3.1.3:</i> This action should also seek to implement the aims of the Forth Climate Forest, as set out in the concordat, and the aims being written into the new Stirling Council Tree and Woodland Strategy. Trees can make a significant contribution to the objectives of the Pollinator Strategy. Forth Climate Forest can also assist	Noted: narrative updated to include reference to FCF Concordat.  Action Plan updated to include FCF as a partner.
5.3.4	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 3.1.5:</i> Forth Climate Forest have begun reviewing some schools within the Stirling Council area for tree planting opportunities within their grounds, as well as opportunities for greening the major active travel routes that lead to the schools. Forth Climate Forest can also assist.	Noted  Action Plan updated to include FCF as a partner
5.3.5	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 3.2.2:</i> Protecting our soils is a key element of adapting to climate change. This activity should take place across the Stirling Council area.	Noted
5.3.6	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 3.3.1:</i> TreeLink Stirling. The number of trees established would be a better measure. There can be high losses from trees planted if they are not cared for until establishment.	Noted and updated. Agreed: the Council is working with partners to develop improved monitoring processes to establish such a measure but will continue to use this measure in the meantime.
<b>5.4 Objective 4. Encourage and supported individual and community resilience</b>			
5.4.1	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 4.1.3:</i> We would welcome greater commitment within this action. A change from Encourage to Ensure and a commitment to actively work with communities to identify and deliver the necessary actions to increase community resilience.	Noted. Much urban land is outside the control of the Council, hence the term 'Encourage'. Actions 4.1.1 and 4.1.2 focus on work with communities to increase resilience.
5.4.2	SIEC/HNC/FCF Joint response (Engage platform)	<i>Action 4.2.2:</i> This action could also recognise the benefits to mental and physical health and wellbeing that green spaces provide.	Agreed: commentary to that effect is referenced for this sub-objective on p 34 of the Main Strategy document.

## 6. Appendices

### 6.1 Appendix 1. Climate Risks and Opportunities for Stirling

6.1.1	Nature Scot (1 April 2025)	<p>Appendix 1 is only mentioned once within the strategy, and it is unclear the link between the strategy and this document.</p> <p>Appendix 1 has a lot of really good information, a good set of specific actions and has the level of detail missing in some of the strategy and action plan. It would be good to understand how these actions (mentioned in Appendix 1) fit in with the Climate Adaptation Plan and if they are going to be delivered anywhere.</p>	<p><i>Main Strategy document, p18, Climate Impacts &amp; Risks:</i></p> <p>“Council officers prepared a briefing paper that summarised global warming implications for Stirling based on evidence for the UK’s 3rd Climate Change Risk Assessment (CCRA3) and a Summary for Scotland. Both documents have helped inform this Strategy by assisting the Council to understand how the changing climate is likely to impact the area’s people, communities, land, natural environment, buildings, infrastructure, businesses, and international dependencies <b>so that appropriate adaptation measures can be identified and developed</b> (see Appendix 1).”</p> <p>The list of <i>Potential Actions</i> in Appendix 1 are fairly generic and were used to generate more specific actions Council services could take, which are then outlined in the Strategy Action Plan, with the relevant Action Plan Reference Number cross-referenced in Appendix 1.</p>
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## Quick Poll Results

Question	Response	No.	%
Do you think that our vision for "a well-prepared, collaborative and climate resilient Stirling" is the right fit for our Adaptation Strategy?	Yes	12	40
	No	14	47
	Don't know	4	13
Do you think that objective 1 and its sub-objectives are clearly defined and useful? <i>Develop and maintain a clear understanding of climate impacts, risks, opportunities, and adaptation actions in collaboration with key partners</i>	Yes	16	53
	No	14	47
Do you think that objective 2 and its sub-objectives are clearly defined and useful? <i>Ensure the resilience of our buildings and critical infrastructure to local climate impacts</i>	Yes	19	63
	No	11	37
Do you think that objective 3 and its sub-objectives are clearly defined and useful? <i>Protect and enhance our natural environment</i>	Yes	16	53
	No	13	44
	Don't know	1	3
Do you think that objective 4 and its sub-objectives are clearly defined and useful? <i>Encourage and support individual and community resilience</i>	Yes	14	47
	No	15	50
	Don't know	1	3
Overall, do you think these four objectives will help Stirling to adapt to a changing climate?	Yes	13	43.5
	No	13	43.5
	Don't know	4	13
If you live in a property that is at risk of flooding, do you know what measures you can take to protect your property?	Yes	3*	10
	No	5^	17
	N/A	22	73

\* Cambuskenneth, Port of Mentieth and Torbrex

^ Bridge of Allan, Fintry, Location not given x 3