

Sustainability and Climate Change Strategy

Finalised Version

Comments on the Draft Strategy

General Comments

Homes for Scotland	Support the principles of sustainability and tackling climate change and stresses the importance of partnership and business to deliver real progress on this agenda.	Welcomed.
SNH	Commend the Council's preparation of this document and the commitment to take the lead in furthering sustainability in Clackmannanshire. Support the ethos of the document and its emphasis on partnership working. Recommend additional objectives, indicators and actions to more representatively reflect the contribution of the natural environment, and fuller recognition of the role of Clackmannanshire Ranger Service in delivering key actions (set out below). Measurement of success/delivery of the Strategy via review of progress and performance on an annual basis is supported.	Welcomed.

Foreword

Introduction: Securing Clackmannanshire's Future

p.1	Suggest that this section should clearly set out the general method of securing the future	This serves as an introductory section and the method is explained in the following pages.	Tillicoultry Community Council
P.1	Suggest that considering "how best to prepare for the considerable threat of	Not accepted - this is an issue for the Council as part of the Clackmannanshire Flood Liaison	Tillicoultry Community Council

	flooding from the low-lying Rivers Devon and Black Devon" is a job for the Scottish Government not the Council, although the Council should be involved in "the planning of flood prevention measures"	Advisory Group (FLAG). It should be noted that the emphasis when dealing with flooding in Clackmannanshire is on flood management, not flood prevention.	
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Sustainability: Finding the balance between our economic, environmental and social needs.

p.3	Suggest that the definition of "sustainability" should contain less jargon, and that "long term" should be defined	Accepted - Strategy is to be re-written in a briefer format, so issues about jargon and the need for plain English will be taken into account.	Tillicoultry Community Council
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The key principles of sustainability

p.4	Living within Environmental Limits - " The definition is not convincing on how this is going to be achieved"	We are already living beyond our environmental limits, and the proposal contained in the Strategy emphasis the importance of a partnership approach to address this.	Tillicoultry Community Council
p.5	Ensuring a Strong, Healthy and Just Society - suggests that there is a need for the Clackmannanshire Alliance to better consult with communities	We will pass this comment on to our Strategic Policy colleagues, who coordinate the Council's Community Planning activities.	Tillicoultry Community Council
p.5	Achieving a Sustainable Economy - contests the use of the term "measurable improvements", since this implies short-rather than long-term improvement.	Not accepted - measurement could take place over a longer time period.	Tillicoultry Community Council
p.5	Promoting Good Governance - questions the statistical accuracy of Clacks 1000 surveys and suggests that more groups should be involved in such surveys	We will pass these comments on to our Strategic Policy colleagues	Tillicoultry Community Council
p.5	Using Sound Science Responsibly - suggests that more information should be included about the kind of science to be employed	Research is carried out on behalf of, <i>inter alia</i> , the UK and Scottish Governments, and is disseminated through policy.	Tillicoultry Community Council

Vision and Aims

p.6	Support for Strategy vision including reference to "a high quality environment which has been protected and enhanced" and taking the lead in mainstreaming sustainability into Council activities.	Welcomed.	SNH
p.6	Questions the assertion that climate change is caused by human activity	Not accepted: reflects the position of the UK and Scottish Governments. Sentence states that "There is increasing evidence [...] that human activity is the main cause of climate change."	Tillicoultry Community Council
p.6	Suggests that the vision and aims contain too much jargon and should be re-written	Accepted	Tillicoultry Community Council
pp.7-8	Delivering Best Value and Sustainable Development in Clackmannanshire / Paths to Improvement - suggests that many people in Clackmannanshire are not aware of the Clackmannanshire Alliance and/or the Community Plan, and that this should be rectified	Will pass these comments on to our Strategic Policy colleagues	Tillicoultry Community Council
p9	Implementing the Sustainability and Climate Change Strategy - suggests that these strategies should be made available to the general public in plain English and should explain how the public are to be involved	Strategies are already available to the general public as adopted - there is no opportunity to re-write them in plainer English	Tillicoultry Community Council

Environmental Policy

p.9	The commitment of the Council, and priorities and aims of the Council are supported.	Welcomed.	SNH
p.9	Suggests this section should be re-written with more description and in plain English	Accepted. This section will be revised.	Tillicoultry Community Council

Strategic Priorities

p.12	Welcome the four strategic priorities identified including the recognition of protecting and enhancing Clackmannanshire's environment.	Welcomed.	SNH
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Climate Change Action Plan

p.13	Suggests that there are other causes of climate change, including sunspots and volcanic eruptions	Not accepted - the Intergovernmental Panel on Climate Change (IPCC) is at least 90% certain that human emissions of greenhouse gases rather than natural variations are warming the planet's surface. Suggest including reference to the IPCC's in this section of the Strategy.	Tillicoultry Community Council
p.13	"Thinking global not local is incorrect because thinking in terms of the solar system is necessary to get a balanced view of the really long term"	Not accepted - climate change is accepted to be an immediate threat for current and forthcoming generations.	Tillicoultry Community Council
p.14	"The Climate Change Declaration is a noble ideal, but it may well be, to some measure impractical. Action to reduce the emission of greenhouse gases will be welcome but a zero carbon footprint is not possible in today's world."	The Climate Change Declaration does not advocate a zero carbon footprint.	Tillicoultry Community Council
pp.14-15	Recognise the fact that reducing adverse effects of flooding and flashiness is a key issue in Clackmannanshire and welcome Council's work on sustainable flood management.	Welcomed.	SNH
pp.14-17	Suggest that this section of the Strategy should address potential losses in extent and integrity of inter-tidal designated sites such as the Firth of Forth SPA. Ongoing work in provision of further habitat such as the Black Devon/River Forth mouth is an example of mitigation of these effects.	Accepted. Priority A and Chapter 5 (Natural Environment) will be amended to highlight the Council's commitment, through partnership working with RSPB and others, to secure and develop the Black Devon Wetlands, and through the role of the proposed Clackmannanshire Adaptation Strategy to identify other means of achieving adaptation measures which will benefit biodiversity in Clackmannanshire in the medium to long-term.	SNH

p.15	Welcome comments on mitigation but suggest that they need to be communicated to, and heeded by, individuals, businesses, industry and the Council	This will be part of the SCCS Communications Plan	Tillicoutry Community Council
p.16	Suggest that work on flooding and adaptation has not been adequately communicated to communities.	Will pass on these comments to the FLAG and bear them in mind when developing an Adaptation Strategy. The River Devon Project report is available on the Council's website	Tillicoutry Community Council
p.17	Suggest that there should be an indication of the resources required to reduce Clackmannanshire's carbon footprint	Accepted - this will be addressed in the Action Plan.	Tillicoutry Community Council
p.17	Suggest that the narrative should be more explicit as to how an 80% reduction in greenhouse gas emissions is to be achieved	Strategy is a high level document; emissions reductions actions will be included in the Action Plan, but this is an emerging area so it will not be possible initially to list all the actions required for a full 80% reduction	Tillicoutry Community Council

Priority B - Creating Sustainable Communities

p.18	Recognition that the quality of the physical environment affects people's health and wellbeing in relation to their environment is welcomed. Enabling people to enjoy the outdoors and the natural heritage adds to quality of life and contributes to sense of place and cultural identity.	Accepted. Chapter 5 acknowledges and explains the importance of these linkages, but this will also be emphasised in revised wording in Priority B.	SNH
p.18-20	Suggest that many communities do not know about the Community Plan and have not been consulted on its contents; suggest that more consultation is needed in order to create sustainable communities	Will pass these comments on to our Strategic Policy colleagues	Tillicoutry Community Council

Priority C - Living within Environmental Limits: Sustainable Consumption and Production

p.21-23	Narrative is vague	Any deficiencies will be addressed in the revised Strategy text	Tillicoutry Community Council
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Priority D - Protecting our Natural Resources and Enhancing our Environment

p.25	Emphasis on enhancement as well as protection of the natural heritage through the development planning system is welcomed	Welcomed	SNH
p.26	Support the Strategic Indicator to "protect and improve water resources" but recommend additional objectives to more fully represent this priority such as protection and enhancement of the woodland resource with an associated indicator to bring it into favourable condition. Recommend appropriate actions are inserted for the indicators, consistent with other strategic priority indicators.	Accepted. The objective of bringing the 80% of Clackmannanshire's woodland not in favourable condition back into active management, and of increasing the area of urban woodland, is described in the text on p.26. This will be added as a Strategic Indicator for Natural Resources and the Environment. Actions will also be added for both of the Strategic Objectives in this section, consistent with the approach taken in the other Priority indicators.	SNH
pp.24-25	"The statement about raw materials is self-evident as is the statement about flow resources"	Disagree. Both of these terms have a specialised meaning and need to be explained	Tillicoultry Community Council
pp.24-26	Criticism that some listed buildings have been allowed to fall into disrepair rather than being maintained	If the Council's policy towards the repair of listed buildings needs to be changed then this will be addressed in the Action Plan	Tillicoultry Community Council
p.26	Concern that approach to environmental conservation and enhancement and working in partnership might not be even-handed	There is nothing in the Strategy to suggest that this will be the case.	Tillicoultry Community Council

Chapter 1 – Regenerating Clackmannanshire

pp.29-31	Support commitment to regenerate Clackmannanshire Town Centres and conserve Clackmannanshire's built heritage	Welcomed.	Dollar Civic Trust
p.29	Brownfield and contaminated sites often have high botanical value and should be subject to an ecological survey prior to allocation and taken account of in the design and lay-out of developments.	This is accepted, however it is considered that the Development Plan is the most appropriate means of introducing new policies to protect the ecological value of brownfield and contaminated sites. Accordingly, this will be considered as part of the preparation of the	SNH

		Clackmannanshire Local Development Plan, due to begin shortly.	
p.30	Suggests the language used in Actions for Improvement: Economic Development should be simplified	Accepted	Tillicoultry Community Council
p.30	"Sustainable communities appear to be aimed at Council owned properties with no apparent help for the private sector, particularly pensioners"	This issue will be examined prior to the finalisation of the Strategy.	Tillicoultry Community Council
p.31	Note that Tillicoultry's built heritage is not mentioned. Suggest that a list should be made of Clackmannanshire's built heritage and the work that needs to be done to it.	It is proposed to conduct an appraisal of Tillicoultry's Conservation Area, as shown under "Objectives and Indicators" on page 33.	Tillicoultry Community Council
p.33	Support proposal to implement the recommendations of the Small Town Studies	Welcomed	Dollar Civic Trust
p.33	Support proposal to complete Conservation Area Appraisals for all of Clackmannanshire's conservation areas	Welcomed	Dollar Civic Trust

Chapter 2 – Carbon Management and Sustainable Energy Use

pp.36-38	"The actions mentioned are well nigh impossible for a private householder to undertake without some financial assistance	Assume this comment refers to the installation of micro-renewable technologies: the Strategy does not recommend these as actions for individual householders	Tillicoultry Community Council
p.38	Welcome proposed use of planning authority powers to implement Sustainable Design & Construction Guidelines, require reduced greenhouse gas emissions in all new developments.	Welcomed.	Dollar Civic Trust
Chapter 2	Has the Council considered any initiatives to increase hydro power in the county? I know this is something the Scottish Executive is promoting at the moment. We have a wealth of potential in the county. Sites suggested are Rackmill; the glens at Alva, Menstrie,	The Council is aware that there has been limited interest in small scale hydro. The Clackmannanshire Local Plan contains a policy (INF 9) which presumes in favour of smaller renewable energy schemes (less than 25kW peak electrical output) provided they do not	Andrew Poulter, Dollar

	Tillicoultry and Dollar; Muckhart Mill; Gartmorn Dam.	result in any significant harm to the visual amenity, landscape or habitats and do not result in unacceptable noise intrusion. A statement of support for small scale hydro, based on Policy INF9, will be added to the finalised Strategy.	
p38	Objection to the "premature introduction" of local sustainable building standards that will lead to inconsistency in approach across the country. Concern about the relationship over time between the requirement for energy reduction measures (increased insulation of the building fabric) in new homes and provision of renewable energy (on-site micro-generation) The main concerns with the latter are high capital costs and the present refusal of private warranty providers to give cover to homeowners for these technologies.	We are working closely with Clackmannanshire Council's Building Surveyors and are very aware that any policy or guidance needs to be in line with, and support, what the building regulations state. These will reflect national guidance and regulations and therefore should be consistent with other local authorities in terms of building regulations. The ethos of Clackmannanshire Council's Sustainable Design and Construction Framework is first to design in measures such as energy efficiency, and then look at ways of providing renewable energy as a by-product of the development. We do not see on-site micro-generation as a paramount issue.	Homes for Scotland

Chapter 4 – Travel

p. 44	Support commitment to improve walk to school routes	Welcomed	Dollar Civic Trust
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Chapter 5 - Natural Environment

pp.47-48	Welcome commitment to protection and enhancement of the natural environment and focus on partnership/collaborative working with SNH.	Welcomed.	SNH
p.49	Welcome the objective to protect and maintain greenspace and woodland	Welcomed.	Dollar Civic Trust
p.49	Suggest changing objective "Encourage outdoor activity" to "Encourage responsible	Accepted	SNH (comments on ER)

	outdoor activity"		
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Chapter 7 - Learning for Sustainability

p.54	Welcome recognition of role of Ranger Service in delivering environmental education to schools	Welcomed	SNH
p.54	Suggest Council-wide support for developing the biodiversity of the schools estate, to ensure funding for such work.	The scope for this proposal will be considered as part of the review of the Clackmannanshire Biodiversity Action Plan. It is noted that Grounds for Learning are currently working with the Council to develop a management plan for school grounds.	Grounds For Learning
p.54	Suggest action to provide cycling facilities and sheltered waiting areas for parents.	This is addressed at pages 43-44 of the Strategy, and in the Clackmannanshire Local Transport Strategy. These comments will be relayed to Roads and Transportation for consideration.	Grounds For Learning
p.54	Notes that Tillicoultry Primary School does not have cycling facilities for pupils	This specific issue will be relayed to Roads and Transportation for consideration.	Grounds For Learning
p.54	Suggests developing renewable energy in more schools	Page 38 contains an action to implement the Carbon Management Strategy and Implementation Plan, which includes an action to investigate the further use of small-scale renewable energy devices in Clackmannanshire. We propose to prepare a Renewable Energy Strategy for Clackmannanshire, which will consider these issues.	Grounds For Learning
p.54	Suggest an action for growing food in schools	We will discuss this with our Education colleagues.	Grounds for Learning
pp.54-55	Suggest that there should be courses for adults as well as schoolchildren to give a better appreciation of sustainability	This comment will be relayed to our colleagues in Education.	Tillicoultry Community Council
p.55	Suggest addition of an indicator and targets to reflect the role of environmental education and awareness raising to wider communities in Clackmannanshire in this section. This	Accepted. An additional indicator and target will be added.	SNH

	makes an important contribution to the Strategy and actions are delivered by Clackmannanshire Ranger Service.		
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Comments on the Environmental Report

General Comments

SNH	The Environmental Report has provided a satisfactory assessment of potential significant effects. The Environmental Report is clear and well structured with a comprehensive assessment of the environmental effects.	Welcomed.
SEPA	Consider that there are unlikely to be significant adverse environmental impacts and generally agree with the findings of the assessment.. Consider (subject to minor comments) that the ER provides an adequate assessment of the potential significant environmental effects of the Strategy	Welcomed.

Section 1.0: Non-Technical Summary

pp.1-4	Consider Non-technical summary to be adequate	Welcomed	SEPA
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Section 2.0: Introduction and Summary

p.7	Suggest inclusion of a summary of how scoping responses have been taken into	Noted - will include in future SEAs	SEPA
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Section 3.0: Sustainability and Climate Change Strategy and Relevant PPS

pp.10-12	Consider that relevant information is given	Welcomed	SEPA
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Section 4.0: Environmental Baseline and Existing Environmental Problems

pp.13-23	Generally content with the level of baseline data and environmental problems identified	Welcomed.	SEPA
p.14	Suggest providing contextual information on the relative value of the different elements of Clackmannanshire's biodiversity (e.g. in a regional/national context) and the overall baseline condition (e.g. evidence of a "decline in biodiversity" Suggest explanation of the relative values of designations	Accepted - will get this information from Biodiversity Officer for future SEAs	SNH
pp.19-20	Suggest reference to River Basin Planning and draft River Basin Management Plans	Accepted - will include in future SEAs	SEPA
p.19	Unclear whether flood risk data takes into account the 1 in 200 year flood maps	Noted - will clarify in future SEAs	SEPA
p.21	Suggest recognition of the two AGLVs Suggest including reference to areas of greenspace per capita and accessibility of populations to areas of greenspace; and provide national context	Accepted, if this information is available for Clackmannanshire	SNH
p.23	Suggest including the spread of non-native species as an environmental problem	Accepted	SNH

Section 7.0: Methodology

pp.26-33	Welcome use of SEA objectives and transparent approach to assessment	Welcomed	SEPA
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p.29	Content with the assessment process in general, subject to some amendments to scoring	Welcomed	SNH
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Section 8.0: Environmental Effects of the Strategy

	General agreement with assessment findings	Welcomed	SEPA
p.36 / p.127	Remind that birds and bats are protected by law so regeneration should not be allowed to have an impact on their nests/roosts	Accepted - will bear in mind for future SEAs	SNH
p.37 / p.146	Suggest recording neutral and negative effects against the objectives "sustainable management..." and "maintain biodiversity..." because access can damage or disturb sensitive sites and species. Suggests reference to SNH's response to Core Paths Plan SEA	Accepted	SNH

Section 9.0: Mitigation and Monitoring

pp.46-48	Content with the proposed mitigation measures	Welcomed	SEPA
pp.46-48	Support the mitigation measures proposed for biodiversity loss	Welcomed	SNH
pp.46-48	Suggest addition of mitigation measure: awareness-raising for developers, architects and planners regarding development / re-development and legal requirements for protection of species	Accepted - will include in Action Plan	SNH
p.48	Welcome the proposed monitoring arrangements	Welcomed	SNH
p.48	Recommend a timescale for evaluating monitoring measures	Accepted - will include in Action Plan	SNH
p.48	Suggest that consideration should be given to how each indicator will be influenced by the	Noted - will include in Action Plan	SEPA

	Strategy: monitoring framework should focus on significant environmental effects which will result from the implementation of the Strategy		
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Appendix E: Strategic Objectives Assessment Matrices - Environmental Effects

p.108	Suggest additional reason for positive long-term impacts on "ensure the sustainable management..." and "maintain biodiversity..." as "modification of sea level change which would benefit the intertidal areas of the River Forth"	Accepted	SNH
p.110	Suggest that "maintain biodiversity..." would have positive effects on quality of life	Not accepted - assessment is of the impact of meeting the objective "Improve Quality of Life in Clackmannanshire" on the objective of maintaining biodiversity, not the other way around	SNH
p.36 / p.127	Remind that birds and bats are protected by law so regeneration should not be allowed to have an impact on their nests/roosts	Accepted - will bear in mind for future SEAs	SNH
p.128	Suggest positive secondary effects on the SEA objective "maintain and restore ecological processes..." if there is regeneration and remediation of brownfield sites where land contamination was causing water pollution.	Accepted - will include in future SEAs	SEPA
p. 37 / p.146	Suggest recording neutral and negative effects against the objectives "sustainable management..." and "maintain biodiversity..." because access can damage or disturb sensitive sites and species. Suggests reference to SNH's response to Core Paths Plan SEA	Accepted - although if the objective is changed to "Encourage responsible outdoor activity" as suggested then this should not be necessary, as it will, by definition, have no adverse impact on habitats and species.	SNH

Appendix F: Strategic Actions Assessment Matrices - Environmental Effects

	Suggest that positive impacts on climate change will not be significant	Noted	SEPA
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