

Clackmannanshire Council

Sustainability and Climate Change Strategy

Post-adoption SEA statement

Required by the Environmental Assessment (Scotland) Act 2005



**Clackmannanshire
Council**

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This document (referred to here as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

Post-adoption SEA statement for the **Clackmannanshire Sustainability and Climate Change Strategy**, adopted on **23 September 2010**. The responsible authority is **Clackmannanshire Council**.

The full strategy as adopted, along with the Environmental Report and post-adoption SEA statement are available on Clackmannanshire Council's website, **www.clacksweb.org.uk**

The strategy as adopted, along with the Environmental Report and post-adoption SEA statement may also be inspected free of charge (or a copy obtained for a reasonable charge) at Clackmannanshire Council's office at Kilncraigs.

To inspect the documents or obtain a copy, please contact:

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Section 1: Key facts

Responsible authority	Clackmannanshire Council
Title of strategy	Clackmannanshire Sustainability and Climate Change Strategy
Purpose of strategy	To embed sustainability and climate change mitigation and adaptation into the activities of Clackmannanshire Council and the Clackmannanshire community.
What prompted the strategy	The strategy was developed to fulfil the sustainable development requirements of the Local Government in Scotland Act 2003, as well as other legal duties and obligations relating to climate change, sustainable development and environmental protection.
Subject	Sustainable development and climate change
Period covered	3 years
Frequency of updates	The strategy will be reviewed annually
Area of strategy	Clackmannanshire
Summary of nature and content of strategy	<p>A strategy to support and encourage sustainability in the community, and improve the Council's own sustainability performance. The strategy includes:</p> <ul style="list-style-type: none"> - An Environmental Policy - A Climate Change Strategy - Three priorities: <ul style="list-style-type: none"> Creating sustainable communities Living within environmental limits Protecting our natural resources and enhancing our environment.
Date adopted	23 September 2010
Contact	<p>Rebecca Bell, Sustainability Officer</p> <p>Clackmannanshire Council Services to Communities Kilncraigs Greenside Street Alloa FK10 1EB</p> <p>rbell@clacks.gov.uk</p> <p>01259 452582</p>
Date	25 February 2011

Section 2: The strategic environmental assessment process

The Clackmannanshire Sustainability and Climate Change Strategy has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report
- Preparing an Environmental Report on the likely significant effects on the environment of the draft strategy which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the strategy and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the strategy;
 - the plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the strategy
- Committing to monitoring the significant environmental effects of the implementation of the strategy. This will also identify any unforeseen adverse significant environmental effects and enable the Council to take appropriate remedial action.

Section 3: How environmental considerations have been integrated into the Clackmannanshire Sustainability and Climate Change Strategy, and how the Environmental Report has been taken into consideration

The Sustainability and Climate Change Strategy has environmental concerns at its core, and aims to align social and economic considerations with environmental protection and enhancement. The strategy is influenced by the five key sustainability principles which form the strategic basis for sustainable development in the UK, one of which is Living Within Environmental Limits. Consequently, environmental considerations have been integrated throughout the strategy.

The SEA identified a number of environmental problems in Clackmannanshire, and these have been addressed in the strategy, either directly or indirectly. The SEA predicted mostly beneficial environmental impacts arising from the implementation of the strategy; it was considered that there were unlikely to be any significant negative environmental impacts. As noted in the Environmental Report, some of the strategy's objectives were modified to make them more beneficial to the environment, as part of the SEA process.

Table 1 shows the environmental problems that were identified through the SEA process, and how they have been addressed in the Sustainability and Climate Change Strategy

Table 1 - Environmental problems

Environmental problem	Response in SCCS
Biodiversity, Flora and Fauna	
Decline in biodiversity in the region	<p>The strategy has the objective "Further the conservation of biodiversity," with several actions related to it:</p> <ul style="list-style-type: none"> • Revise Clackmannanshire Biodiversity Action Plan and ensure linkage to woodland management, natural flood management and greenspace / habitat network objectives (including an Integrated Habitat Network), and ensure integration with the Council's emerging Climate Change Adaptation Framework. • Continue support for the Clackmannanshire Biodiversity Partnership to deliver projects to protect and enhance biodiversity in Clackmannanshire. • Continue collaborative work with the RSPB, including preparation of a Management Plan, to improve the Black Devon Wetland and support the Forth Vision. • Encourage the protection and enhancement of the natural environment through policies in the Local Development Plan.
Lack of information on European protected species	
Impacts of climate change on biodiversity	

Environmental problem	Response in SCCS
Population and Human Health	
Predicted population decline.	<p>The strategy includes the following objectives to address these issues:</p> <ul style="list-style-type: none"> • Improve quality of life in Clackmannanshire • Target skills and training, and reduce unemployment • Reduce social exclusion • Reduce health inequalities • Encourage a healthy level of physical activity <p>There are a number of actions relating to these objectives:</p> <ul style="list-style-type: none"> • Work with community planning partners on initiatives to enhance quality of life in Clackmannanshire. • Deliver key actions set out in 'Building Clackmannanshire', the Clackmannanshire Alliance's economic framework. • Implement Development Plan policy on affordable homes. • Implementation of actions set out in the Local Housing Strategy. • Continue investment in heating systems and thermal insulation in existing housing stock. • Implementation of the Housing (Scotland) Act 2006. • Develop an Affordable Warmth and Home Energy Action Plan which will set targets and actions for promoting affordable warmth and reducing fuel poverty. • Review and update objectives in Clackmannanshire Joint Health Improvement Plan. • Establish current use and set targets for use of selected core paths. • Develop an Outdoor Access Strategy. • Increase physical activity through Clackmannanshire's anticipatory care programme (Clackmannanshire Healthier Lives), and Wee County Walkers. • Promotion of active physical activity through the Clackmannanshire Ranger Service outdoor activities programme. • Encourage physical activity through sports development, laying the foundation for a healthy, active lifestyle.
Ageing population.	
Health inequalities.	
<p>The Scottish Indices of Multiple Deprivation have targeted areas of Alloa South and East and Tullibody, and parts of Sauchie, Coalsnaughton and Devonside as needing support.</p>	
Water	
Areas of the Forth Estuary are classed as poor by SEPA.	<p>The strategy contains an objective to "Protect and improve water resources", with the associated action "Local Development Plan policy to address the need to ensure that new development, land use and land use change do not detract from water status improvement."</p>
Scotland-wide issues of erosion.	
Climate change affecting organic content.	

Environmental problem	Response in SCCS
Soil	
Potentially sizeable amount of contaminated land, although there is not a considerable amount of urban vacant and derelict land present in Clackmannanshire.	Contaminated land is not explicitly addressed in the Sustainability and Climate Change Strategy. However, it is dealt with in the Council's Contaminated Land Inspection Strategy, and through development planning.
Material Assets	
Household waste generation increases every year, however Clackmannanshire recycling levels are higher than Scottish average figures. Scotland wide issues of poor building maintenance.	<p>The strategy includes the following objectives to address these issues:</p> <ul style="list-style-type: none"> • Minimise waste generation • Maximise recycling and composting • Regenerate Clackmannanshire's town centres <p>The strategy also contains the following actions:</p> <ul style="list-style-type: none"> • Implementation of National and Area Waste Plans. • Continued promotion of waste prevention and awareness. • Development of a Waste Minimisation Plan. • Maintain and extend existing waste management facilities. • Take action to enhance and improve Alloa town centre through the Town Centre Business Improvement District and Imagine Alloa initiative. • Develop a Strategy for Town Centre Improvement, to build on the regeneration achieved by the Imagine Alloa initiative in Alloa town centre and to identify priorities for improvement in other town centres. • Implementation of actions set out in the Local Housing Strategy. • Implementation of the Housing (Scotland) Act 2006.
Air	
Air quality in the region is generally high in terms of national air quality objectives, although there are some concerns over PM10 levels.	<p>The strategy contains an objective to "Reduce the environmental impact of travel". This is supported by actions to:</p> <ul style="list-style-type: none"> • Implement Local Transport Strategy. • Adopt a Green Travel Plan for the Council. • Implement the transport element of the Council's Carbon Management Strategy and Implementation Plan. • Establish a recording system for fleet fuel costs and establish targets for reduction. • Promote the use of pool bikes at Council offices for work-related journeys.
There are no Air Quality Management Areas in Clackmannanshire and little industrial activity.	
However the rural regions are poorly serviced by public transport, which encourages private car use.	

Environmental problem	Response in SCCS
Climatic Factors	
Flood risk in many areas.	The strategy includes the following actions and objectives relating to climate change:
<p>SEPA's State of Scotland's Environment 2006 identifies climate change as Scotland's most significant environmental problem although Clackmannanshire's Carbon Footprint and Ecological Footprint are lower than Scotland's average.</p>	<ul style="list-style-type: none"> • Preparing for predicted climate change impacts in Clackmannanshire by improving our resilience and adaptive capacity. • Reduce our contribution to climate change through mitigation measures. • Reduce the Council's carbon footprint and improve energy conservation and efficiency throughout the Council. • Facilitate and encourage the sustainable location of new development. • Facilitate and encourage the sustainable design of new development • Prepare an adaptation framework for Clackmannanshire • Prepare a Flood Management Strategy. • Implement the Council's Carbon Management Strategy and Implementation Plan to reduce carbon dioxide and other greenhouse gas emissions. • Investigate and report on the scope for the introduction of a carbon accountancy framework within the Council. • Review the Council's Carbon Management Strategy and Implementation Plan and develop new targets for emissions reduction beyond 2012. • Develop a Greenhouse Gas Reduction Strategy for Clackmannanshire in partnership with community planning partners. • Pursue funding to promote home insulation and energy saving across the housing stock. • Develop a Renewable Energy Strategy which will set actions and targets for increasing the proportion of the Council's energy needs that will be met from renewable sources. • Continue to investigate the potential to expand on existing renewables use in the schools estate and through the development of renewable energy technologies on Council owned land. • Prepare a Water Management Strategy for the Council. • Develop new sustainability criteria for the location of new development in relation to key services, active travel routes and public transport through the Local Transport Strategy (LTS) and Local Development Plan (LDP) processes. • Assess all LTS and LDP policies and guidelines using strategic environmental assessment, to identify the most environmentally sound policy options. • Introduction of sustainable design and construction guidelines for new development as Supplementary Planning Guidance.

Environmental problem	Response in SCCS
Cultural Heritage	
Scotland-wide issues of neglect of buildings.	The strategy includes objectives to: <ul style="list-style-type: none"> • Regenerate Clackmannanshire's town centres • Conserve Clackmannanshire's built heritage These are supported by following actions: <ul style="list-style-type: none"> • Take action to enhance and improve Alloa town centre • Develop a Strategy for Town Centre Improvement • Complete Conservation Area Appraisals for all of Clackmannanshire's conservation areas.
Unused and derelict properties can detract from the character and appearance of the townscape.	
Landscape	
The landscape's capacity to absorb development is an issue, although landscape capacity studies have been carried out to inform development plan allocations.	The strategy acknowledges the importance of the area's landscape and supports the Ochils Landscape Partnership. Policy to protect the landscape will be taken forward in the emerging Local Development Plan.
Developments such as windfarms may affect the landscape character of Clackmannanshire.	

The Environmental Report concluded that, due to the overall positive effects of the strategy objectives and actions, there was little need for mitigation. However, it identified some areas where the objectives in the strategy had the *potential* to conflict with environmental priorities, and proposed measures to resolve these conflicts. Table 2 shows the potential conflicts with environmental priorities, the mitigation measures proposed in the Environmental Report, and whether and how these proposals have been incorporated into the final Sustainability and Climate Change Strategy.

Table 2 - Potential conflicts and mitigation measures

Potential conflict	Suggested mitigation	Action taken
<p>Economic development goals may clash with environmental protection goals.</p>	<p>Action C7B: Increase Awareness of Sustainability Issues within the Council.</p> <p>It is suggested that awareness of the importance of SEA objectives should be raised alongside actions designed to meet this sustainable economic development objective in order to mitigate as far as possible any negative environmental effects which could occur.</p>	<p>The final strategy contains the objective "Increase awareness of sustainability issues within the Council" - this is supported by an action to "Prepare a Communication Strategy with specific actions to improve awareness and capacity across the Council".</p> <p>The strategy emphasises that "economic growth can only be considered successful if it genuinely improves quality of life [...] [R]egeneration should contribute to the protection of our natural resources and the enhancement of our environment."</p>
<p>Regeneration / Improvements to town centres may damage / disrupt biodiversity present in urban environments such as vacant and derelict land and buildings.</p>	<p>Biodiversity and habitat disruption should be avoided by first regenerating sites absent of such biodiversity. Where this is not feasible alternative habitat options/opportunities should be made available e.g. through the provision of artificial habitats such as bird/bat nesting sites built into buildings and reestablishment of wildlife corridors such as trees and other vegetation.</p> <p>Strategic Environmental Assessment screening for plans and strategies will ensure these negative environmental effects are minimised.</p>	<p>The strategy states that "regeneration should contribute to the protection of our natural resources and the enhancement of our environment."</p> <p>The strategy contains an action to "Revise the Clackmannanshire Biodiversity Action Plan" - this should take into account habitat network objectives, including habitats in the built environment or on brownfield sites. The Clackmannanshire Biodiversity Action Plan will be subject to strategic environmental assessment.</p> <p>The strategy contains an action to "Develop a Strategy for Town Centre Improvement" - such a strategy would be covered by the Environmental Assessment (Scotland) Act.</p>

Potential conflict	Suggested mitigation	Action taken
<p>Regeneration / improvements to town centres may remove opportunities for the public to come into contact with wildlife and wildlife places by developing areas such as green space, brown field land and other open spaces which are recognised as wildlife havens.</p>	<p>Regeneration/ town centre improvements should be undertaken in such a way as to promote opportunities by maintaining and enhancing existing wildlife places in town centres such as parks and gardens.</p> <p>Wildlife areas lost to development should be replaced where possible e.g. through the provision of new open spaces such as parks, gardens and other landscape features.</p> <p>Strategic Environmental Assessment screening for plans and strategies will ensure these negative environmental effects are minimised.</p>	<p>These issues should be considered through the development of the Strategy for Town Centre Improvement and the revision on the Clackmannanshire Biodiversity Action Plan, both of which would be covered by the Environmental Assessment (Scotland) Act.</p> <p>The Sustainability and Climate Change Strategy states that "regeneration should contribute to the protection of our natural resources and the enhancement of our environment."</p>
<p>Development of new [outdoor activity] infrastructure may remove green field land and disturb/ damage habitats and biodiversity.</p>	<p>Promote best use of existing infrastructure as a priority.</p> <p>Utilise brown field land instead of green field sites.</p> <p>Strategic Environmental Assessment screening for plans and strategies will ensure these negative environmental effects are minimised.</p>	<p>The strategy recognises the importance of effective co-ordination of plans relating to outdoor access and the natural environment, and highlights a number of joint projects which recognise the strong synergies between diverse areas, including support for the Central Scotland Green Network.</p> <p>Any plans, programmes or strategies developed by the Council should be subject to SEA.</p>

Potential conflict	Suggested mitigation	Action taken
<p>Increased pressure/disruption on biodiversity and soil resources as access to environment increases.</p>	<p>Action C7A: Continue to Support and encourage sustainability activity in schools, particularly through the Eco-Schools programme (ESP).</p> <p>Action C7C: Support and Implement the Clackmannanshire Environment and Sustainability Framework.</p> <p>Provide adequate signage to minimise disturbance to biodiversity and to reduce instance of littering in environment.</p> <p>Strategic Environmental Assessment screening for plans and strategies will ensure these negative environmental effects are minimised.</p>	<p>The strategy includes the following actions:</p> <ul style="list-style-type: none"> • Continue to support and encourage sustainability activity in schools, particularly through the Eco-Schools programme. • Prepare a communications strategy with specific actions to improve awareness and capacity across the Council. • Implement the Clackmannanshire Alliance Environment Framework, <i>Greening Clackmannanshire</i>. <p>The environmental impacts of access should be considered through the Outdoor Access Strategy, which will be subject to SEA.</p>

Section 4: How opinions expressed during the consultation have been taken into account

Two organisations - Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA) - commented directly on the Environmental Report. SNH also made separate comments on the draft strategy itself, as did the following organisations: Dollar Civic Trust, Grounds for Learning, Homes for Scotland and Tillicoultry Community Council. Consultees were sent full responses to their comments. A summary of these comments, and how they were taken into account, can be found in table 3 below.

Table 3 - Consultees' comments on the draft Sustainability and Climate Change Strategy and its Environmental Report, and how they were taken into account

Consultee / Respondent	Summary of comments	How the comment was taken into account in making the decision to adopt the final strategy
Dollar Civic Trust	Welcomed a number of the commitments in the strategy.	Welcomed
Grounds for Learning	A number of suggestions regarding biodiversity in the schools estate; cycling and waiting facilities for parents at schools; renewable energy in schools; and food growing in schools.	These suggestions have not been explicitly taken forward in the Sustainability and Climate Change Strategy; however, they will be discussed with colleagues in Education and considered as part of the reviews of the Clackmannanshire Biodiversity Action Plan and Local Transport Strategy where appropriate.
Homes for Scotland	Objection to the "premature introduction" of local sustainable building standards	Clackmannanshire's Sustainable Design and Construction Framework will be produced as supplementary planning guidance as part of the preparation of the Local Development Plan - this will be done by working closely with the Council's Building Surveyors and in consultation with stakeholders.
Scottish Environment Protection Agency	<p>Subject to minor comments, generally content with the Environmental Report.</p> <p>Suggested some information that would have been welcomed in the Environmental Report.</p> <p>General agreement with assessment findings, although some comments on specific impacts</p>	<p>Welcomed</p> <p>These will be noted and incorporated into future SEAs.</p> <p>These will be noted and incorporated into future SEAs.</p>

Consultee / Respondent	Summary of comments	How the comment was taken into account in making the decision to adopt the final strategy
	<p>Noted that some of the monitoring indicators and targets may not be solely affected by the Sustainability and Climate Change Strategy; the monitoring framework should focus on the significant environmental effects which will result from the implementation of the strategy.</p>	<p>Targets and indicators for monitoring the strategy are included in the strategy Action Plan; these include measures for monitoring the environmental effects of the strategy.</p>
<p>Scottish Natural Heritage</p>	<p>Welcomed various elements of the strategy.</p> <p>Suggested several environmental and management issues that the strategy ought to address / emphasise.</p> <p>Recommended additional actions and objectives for the strategy.</p> <p>The Environmental Report is clear and well structured with a comprehensive assessment of the environmental effects.</p> <p>Raised some issues about the state of the environment and baseline data. Some detailed comments on assessments.</p>	<p>Welcomed</p> <p>The strategy has been amended to address / emphasise these issues.</p> <p>Actions and objectives in the strategy have been revised.</p> <p>Welcomed.</p> <p>These issues will be included in future SEAs.</p>
<p>Tillicoultry Community Council</p>	<p>A number of comments regarding the language and explanation in the plan.</p> <p>Some questions / comments about the topics covered in the plan, and suggested actions.</p>	<p>Noted - the finalised strategy attempts to use clearer language and better explanation.</p> <p>Where appropriate actions have been amended to address the issues raised, however some of the comments (such as those questioning the evidence for anthropogenic climate change) were not accepted.</p>

Section 5: Reasons for choosing the Clackmannanshire Sustainability and Climate Change Strategy as adopted, in light of other reasonable alternatives

There were considered to be no reasonable alternatives to the preparation of a Sustainability and Climate Change Strategy for Clackmannanshire: the strategy was required by a Council decision as a mechanism to help the Council meet its duties and objectives relating to the environment and sustainable development in a co-ordinated and integrated way. These primary considerations include the duty of best value under the Local Government in Scotland Act, as well as commitments made in signing Scotland's Climate Change Declaration and, more recently, the duties on public bodies under the Climate Change (Scotland) Act.

The objectives and actions in the finalised strategy were developed and refined as a result of the SEA process, and informal consultation within the Council. This process has encouraged buy-in to the strategy from stakeholders both within and outside the Council, and a holistic document which aims to embed sustainability in all of the Council's activities.

It is anticipated that the strategy will have beneficial environmental impacts; any uncertainties about environmental impacts of any actions will be fully considered at the implementation stage.

Section 6: Measures that are to be taken to monitor the significant environmental effects of the implementation of the Sustainability and Climate Change Strategy

The Clackmannanshire Sustainability and Climate Changes Strategy includes a framework for monitoring the success of its actions. The following indicators will be used to monitor its environmental effects. Full details of data sources and targets can be found in the Sustainability and Climate Change Strategy.

Table 4 - Monitoring framework

Topic	Indicator
Biodiversity, flora and fauna	Designated nature sites in a favourable condition.
Population & human health	% adults fairly happy or very happy.
	Rate of adult physical activity in sedentary population.
	Obesity levels in P1 schoolchildren.
	Number of visits to the outdoors.
Soil	The Sustainability and Climate Change Strategy does not contain any indicators for monitoring impacts on soil. The SEA identified some uncertain and potentially negative impacts on soil, but these were all related to the implementation of 'daughter documents' such as the Core Paths Plan, Outdoor Access Strategy and Open Space Strategy. For this reason, soil quality is expected to be monitored as part of these documents' monitoring frameworks.
Water	Water status.
Material assets	Tonnage of municipal solid waste.
	Proportion of municipal biodegradable waste recycled and composted.
	Municipal biodegradable waste sent to landfill.
	General Cleanliness Index.
Air	Transport modal share for journeys.
	Transport modal share for Council staff's journeys to work.
	Council vehicle mileage costs.
	Use of Council pool bikes.
Climatic factors	Council's carbon dioxide emissions.
	Council's water use.
	Percentage of new developments with a total cumulative floorspace of 500 sqm. or more incorporating on-site zero and low carbon equipment.
	Percentage of new development achieving zero carbon status.
Cultural heritage	Percentage of residents visiting historically or architecturally valuable sites and buildings.

Topic	Indicator
Landscape	The Sustainability and Climate Change Strategy does not contain any indicators for monitoring impacts on the landscape. The SEA did not identify any likely negative impacts on the landscape, and the strategy does not contain any objectives or actions relating to it. The Sustainability and Climate Change Strategy should have an influence on the Ochils Landscape Partnership and Clackmannanshire Local Development Plan, and landscape impacts are expected to be monitored through these plans' monitoring frameworks.
Other	Ecological footprint