**Draft Pollinator Action Plan 2021-2027**

**Riverside Community Council Response**

Riverside Community Council is very encouraged by the publication of the draft Pollinator Action Plan. Both this, and the Alive with Nature plan, demonstrate Stirling Council’s recognition of the climate emergency, the biodiversity crisis, and the urgent need to act.

There are many extremely positive aspects to the pollinator strategy. It is rich in quality aims and objectives regarding increasing pollinator plants, increasing, and maximising the value of greenspace, promoting biodiversity corridors and building knowledge and understanding. A key theme of involving Stirling people at all levels from the grassroots upwards is also commendable and necessary. Riverside Community Council would like to hold onto all these positive aspects but has also noted some areas where the plan lacks sufficient detail.

**Resources**

The question of resources to effect the plan is not addressed. For example, what funding is allocated for community engagement, for re-wilding, for extra tree planting, education, and awareness etc.

For the plans to be effective it will require wider and different levels of engagement, including with grassroots organisations, non-governmental organisations and businesses in a way that has no precedent. There is no mention of resources for this crosscutting engagement work or incentives.

**Voluntarism**

Related to the above, the plan will rely heavily on volunteers carrying out some of the work, including monitoring. More detail and a conception of how sustainable this can be in the absence of resources being allocated is needed. What contingencies are there to keep the momentum going? What resources, training, oversight, incentives etc are needed. There are also some questions around relying on voluntary effort to achieve key and/or statutory goals.

**Advice and leadership**

The council is a locus for expertise but the assertion the council can offer advice and leadership to local communities and businesses is questionable in the current climate. The food growing strategy which is a statutory requirement was late and not consulted upon which raises the question of whether the council has sufficient resources to achieve the plan. Are there any plans to outsource or commission support from environmental organisations and the third sector?

**Public Private interface and auditing:**

To be effective public and private landowners must work together, including in the establishment of habitat and pollinator corridors. The council has a clear remit to manage and to lead on council owned and managed land, including with its lease holders. However, what are the limitations regarding working with private landowners and auditing private land? This is an area of work that could be critical to the plan’s success. There is very little detail on how this can be delivered.

**The Working group:**

The working group does not include any grassroots or community organisations and as such it doesn’t fully recognise that to achieve the plan on the ground, which needs community buy in, will be limited without representation. Community councils yet these are not represented in the working group and there is no community council forum that can be represented, yet community councils have the most coverage of citizens not currently involved in environmental organisations. There is no point preaching only to the already converted.

**Stalled spaces dilemma**

In Glasgow and other areas in Scotland stalled spaces were criticised for their impermanence – the idea that the land was of value for pollination and food growing yet could also be taken for development at any point. There is no real discussion in the plan about levels or permanent and temporary land use for pollination. This is relevant to any incentives or investment or resources that are made available. Resources must be directed towards real and lasting changes.

**Private Gardens**

Private gardens across Stirling are a valuable resource for pollinators and yet this is not mentioned in the plan, including any audit of their value. Previous environmentally directed policies and initiatives, for example the master composter scheme, managed successfully to engage citizens in environmental actions in their own private gardens and spaces yet this plan doesn’t seem to address this type of action.

**Education and awareness**

The plan only refers to “appropriate” use of pesticides and does not extrapolate on any conditions where pesticides are necessary for protecting biodiversity.

**Economic outcomes.**

The plan is vague in terms of the economic benefits of increasing pollinators, and this will be required to engage those who prioritise economic benefits.

**Planning**

The predisposition towards development in planning policies could be an issue, the plan does not address how it will dovetail with planning policies and how, if at all, it will be amended when NPF4 is completed. In its talk of objectives, it does not really concretise some of the barriers there will be regarding land use.

**Targets, scope, size, measurements, time…..**

The plan is very short on concrete measurable targets, numbers, sizes of land and timescale etc. It will be difficult to monitor and effect the plan without that. For example, the aim of increasing the area of land owned and managed for the benefit of pollinators is vague. There is no target size and no clarity whether the council intends to purchase more land or how it intends to incentivise the management of land not within council ownership. How will it determine any progress without measurable outcomes and benchmarks?. In addition, there is no conception of ‘quality’ pollinator habitats. How will we know that a given piece of unattended verge is a quality pollinator habitat or not?

**Embedded**

It is commendable that the council intend to embed the strategy across the ‘breadth’ of their work but there is no detail of how this will be effected, transmitted and evaluated across so many different departments.

**Resistance**

There is no mention of how the council will deal with any resistance to the plan. Mowing regimes are a possible source of local resistance.

**Baseline data is lacking**

The plan notes that baseline data will be gathered. It seems strange that a plan has been issued without reference to baseline data.

**Consultation**

It is stated that **“** The Stirling Pollinator Action Plan will be informally reviewed annually through discussion with stakeholders.” This is vague. Whilst informal consultation is very valuable in many ways it is a risk to rely only on that. There needs to be a formal strategy for consulting stakeholders, including grassroots to ensure engagement and support. Otherwise the plan will be only developed by the council and the same known charities.