

Consultation body	ER reference	Consultation body comment	Response	Action for SG	SG comments
Historic Scotland	How the SEA has influenced the content of the SG	It would perhaps be helpful to consider, in this section, how the SEA has influenced the selection of Option 4 over Options 2 and 3, as this is a main consideration of the ER.	This is addressed within paragraph 5.4.	None.	N/A
	Table 3.7	There are some instances where the ER refers to issues which are not picked up in the SG. This was particularly notable in Table 3.7, which states that the issue of cultural heritage will be required to be assessed cumulatively. This is not captured in the SG itself, where cumulative impacts are only referred to for Landscape and Visual, Ornithological and Aviation interests.	Accepted and amended.	Consideration requires to be given towards amending the SG to ensure that the cumulative effects of wind energy developments upon cultural heritage designations are fully considered.	A section on cumulative impact has been added to section G of the guidance.
	Table 5.2	The policy/action referred to for Visual Impact makes no reference to cultural heritage features. However, the SG itself identifies some heritage assets under this category. As this inclusion is not referenced in the SEA, it is not clear how it has been justified. I refer you to our response on the SG made through the online portal for our comments on this issue in the SG.	Section B of the SG covers the issue of visual impacts. It is clear that wind energy developments could have implications for a number of features and designations within the surrounding landscape due to the nature of the structures. This section of the SG is intended to cover all of the issues upon which there could be visual implications as a result of wind energy developments, including cultural heritage features. It is unclear why a justification for this would be required.	None.	The criteria on which the landscape character assessment was based also sought to reflect the significance of conservation interest.  In addition to its scenic qualities, it included notable conservation interests, such as features of historical or architectural interest within an area.
	Assessment methodology and criteria	The SEA objective and associated question for cultural heritage is considered appropriate and proportionate. The inventory of battlefields should be identified within Table 4.1, although it is accepted that there are none within South Ayrshire.	Accepted and amended.	None.	N/A
	4.2.1	It is stated that without the WESG there may be adverse impacts on the setting of CH assets. You may wish to consider whether the existing historic environment policies in the LDP have the potential to mitigate this.	Accepted and amended. It is accepted that if the historic environment policy is operating effectively, this would ensure that any potential adverse implications for cultural heritage features are identified and addressed.	None.	N/A
	Monitoring	We are broadly content with the indicator and remedial actions identified in Table 7.1. However, you may wish to consider reviewing WoSAS' responses to planning applications also, particularly as Historic Scotland's responses would not capture significant adverse impacts on undesignated heritage or category B and C listed buildings.	The consultation comments from WoSAS have been included as a data source. It is accepted that consultation responses from HS would not capture significant adverse effects on B and C listed buildings, however, it is hoped that the comments of the Council's Conservation Planner would be useful in this regard.	None.	N/A
	Appendix C – Baseline Data	3.3.2 states that Culzean Castle is a scheduled monument. In fact, the Castle itself is not scheduled, but is a category A listed building (HB Number 7595).	Accepted and amended.	None.	N/A
	3.3.4	3.3.4 makes reference to C listed buildings grouping well with buildings in categories A and B. This phrasing appears to refer to SHEP, which does not specify this, but rather simply states, "and simple, traditional buildings which group well with others" If the intention is for the wording of this to be in line with SHEP, you may wish to consider revising it.	Accepted and amended.	None.	N/A
	3.8.3	It is suggested that archaeological consultation triggers "trigger consultation with Historic Scotland". As this is	Accepted and amended.	None.	N/A

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		not a trigger for consultation with HS, this should perhaps refer to WoSAS.			
	3.9.1	There is no reference to Historic Marine Protected Areas. Whilst there are none off the coast of South Ayrshire, it would perhaps be helpful to identify that the designation was identified as a potential consideration.	Accepted. The ER has been updated to make reference to the fact that there are no Historic Marine Protected Areas off of the South Ayrshire coast.	None.	N/A
	Appendix D – Assessment Matrix	The assessment of cultural heritage impacts for Option 3 states that minimum separation distances from designated heritage features will not automatically protect setting. Whilst we agree that this is the case, and that impacts are likely to be uncertain or neutral, there is no acknowledgement here that the existing historic environment policies in the LDP would also apply, and therefore provide protection. This is notable as recognition of this is given in the assessment of Option 4, and you may wish to alter this to ensure consistency.	Accepted and amended.	None.	N/A
	Appendix E – Consultation comments	In response to Historic Scotland’s scoping consultation response, it is stated that “any impacts upon specific assets will be picked up as part of the assessment process”. It is not clear what this means, as this is not apparent in the ER. It may be that this refers to assessment at project level, in which case, it may be helpful to clarify this.	This statement means that if there were any implications for a specific cultural heritage asset, this would be picked up as part of the assessment and identified within the associated commentary. It was considered unnecessary and imbalanced to list every cultural heritage feature when this has not been done for each of the other SEA topics.	None	N/A
Scottish Natural Heritage (SNH)	General	Broadly, the environmental issues/concerns and key trends have been correctly identified, the assessment of likely significant effects in the environment have been carried out satisfactorily and the measures that could prevent, reduce or offset any significant adverse effects on the environment when implementing the SG have been clearly identified.	Noted	None	N/A
	HRA	We note that also contained within the document is the associated Habitats Regulations Appraisal. I confirm that we are content with the conclusions of the appraisal at this stage. Please note that if any modifications to the SG are proposed, it will be necessary to screen the proposed changes for the likelihood of a significant effect on the qualifying interests of Natura sites. We will be pleased to advise if any further changes to the HRA are made.	Any changes made to the SG will need to be considered within the context of any HRA implications.	Any changes made to the SG must be highlighted in order to identify HRA implications.	
Scottish Environmental Protection Agency (SEPA)	Peat and Forest Waste	In Appendix 1 of our response to the scoping consultation for this SEA dated 18 July 2014 we highlighted that development on peat can generate large volumes of excavated peat and that every effort should be made to minimise the volume of excavated peat and ensure its reuse in an appropriate manner without resulting in waste generation. It is noted that the ER predominantly refers to peat as an economic resource and in relation to carbon capture and storage. Appendix E indicates that there may be scope for a further iteration of the SG which may take this into account. We recommend that this is undertaken.	Noted. This will be referred to the SG for inclusion within the final version.	The SG should give consideration to ensuring that every effort is made to minimise the volume of excavated peat and to promote its reuse in an appropriate manner without resulting in waste generation.	Text has been included in the SG, section H which stresses the need to minimise the disruption/disturbance of peat. This is expected to be achieved through the spatial strategy which seeks to direct development away from indicative peat areas and by adopting an approach of site minimising and

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					disturbance on site. Applications submissions are expected to include detailed mapping of peat depths and tables of peat quantities. A peat management plan is advocated if appropriate.
		We also highlighted that the potential issue of forestry waste from wind farm sites on afforested land should be taken into account. Where material is classed as waste then appropriate waste management options require consideration and, where appropriate, adoption. The waste hierarchy must be applied in a way which delivers the best overall environmental outcome. Appendix E states, "It isn't clear what the environmental implications of forestry waste are...". Further information on this is available on page 13-14 of our Planning Advice on Windfarm Developments and within SPEA's Guidance, Management of Forestry Waste. We recommend that further iterations of the SG should take this into account also.	This appears to be a comment which is more suitably directed at the SG.	The SG should explore the potential to include wording which promotes the minimisation of forestry waste and its appropriate reuse in accordance with SEPA guidance.	The SG includes text which will require details of how forestry waste will be dealt with. The principle adopted in the guidance is to minimise woodland loss in the first instance.
	Table 4-1 SEA objectives and associated questions	Soil – The questions associated with this issue do not cover potential problems with waste peat disposal.	Accepted and amended. The assessments have been redone to ensure that this issue is adequately addressed.	A new mitigation measure has been suggested in accordance with the findings of the renewed assessment.	Refer to comment above on peat.
		Water – The questions associated with this issue focus on water quality and flood risk. It would be useful to clarify that the water environment includes wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater.	Table 3-7 has been amended to confirm that the water environment includes wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater.	None	N/A
		The Water Framework Directive encompasses modification of watercourses and biological quality as well as water quality to give an ecological status. All of these issues should be incorporated in the questions for this issue.	The associated question for this issue has been updated so that it is targeted at implications upon the ecological status of features of the water environment. This ensures that all of the relevant issues are covered in accordance with the WFD.	No new mitigation measures identified following renewed assessment.	N/A
		We note that there is not specific mention of private water supplies under this issue. This should be taken into account.	An additional objective and question has been included within the assessment in order to take account of this issue.	A new mitigation measure has been suggested in accordance with the findings of the renewed assessment.	The guidance requires all private water supplies to be identified on site and also those in close proximity/catchment outwith. It also requires measures to be put in place to protect them, including buffers.
		Material Assets – Whilst the questions associated with this issue promote sustainable use of natural resources no specific mention is made of waste issues such as peat and forestry waste.	An additional objective and question has been included in order to take account of this issue.	A new mitigation measure has been suggested in accordance with the findings of the renewed assessment.	The intent of the guidance is to minimise peat and forest waste. Text in relevant sections has been added to reflect this issue. A standalone section on waste has also been

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					added.
	Section 6 – Water Environment	We note that flooding (6.3.3) is referred to under 6.3 Coastal waters. Flooding of all types (pluvial, fluvial, groundwater and coastal) should be taken into account to avoid piecemeal reduction in the functional flood plain in accordance with SPP paragraph 256.	The purpose of identifying ‘flooding’ in that section was to highlight that there are flooding issues along the coastline. It is accepted that there are numerous flood risk areas within South Ayrshire which are associated with features other than the coastline, including pluvial, fluvial and groundwater. The baseline data has been updated to acknowledge this.	None	N/A
		Groundwater vulnerability (6.3.5) is also referred to under 6.3 Coastal waters. It is unclear why this is considered only as a coastal issue and all groundwater issues should be considered including private water supplies (PWS) and Groundwater Dependent Terrestrial Ecosystems (GWDTE).	The purpose of this was to identify that groundwater can be a contributory factor to flooding around coastal areas. The baseline has been updated to acknowledge that groundwater flooding is not restricted to coastal areas.  GWDTE and domestic water supplies have been acknowledged within the SG. It is accepted that changes could be made to ensure that this explicitly includes “private water supplied”. In terms of baseline data, it would be unrealistic to map all GWDTE and PWS.	Consideration should be given to including measures within the SG which ensure the protection of PWS during both construction and operation of any development.	The section on the impact of proposals on the water environment has been redrafted. This includes measures which will seek to ensure the protection of PWS.
		The reason for requesting the inclusion of GWDTE is that these habitats are protected under the Water Framework Directive (WFD) and may be impacted upon by windfarm development through the excavation of soil and bedrock during construction of roads, access tracks, foundations, trenches and borrow pits. Indeed dewatering of below ground activities may cause localised disruption to groundwater flow. This can impact on GWDTE and nearby abstractions such as PWS.	This issue has been covered within the SG. It has been updated to explicitly make reference to “private water supplies”, as opposed to domestic water supplies, in order to avoid any confusion.	Reference to PWS and the need to protect them should be included within the SG.	The section on GWDTE has been re-drafted and includes specific reference to buffers for roads, access roads, trenches, turbines and borrow pits as well as reference to good practice advice. Measures will seek to ensure the protection of PWS.