

## Appendix B Scoping Consultation Comments

Consultation Body	Ref.	Scoping Report Ref	Consultation Body Comment	Response
SEPA	1. General Comments		In general, we are satisfied with the scope and level of assessment proposed however, we would offer further detailed comments.	Comment noted.
	2. Detailed Comments	Relationship with other PPS	Council may wish to consider discussing the Flood Risk Management (Scotland) Act 2009 in the water section. SPP7 is soon to be replaced by SPP part 3.	To be included in the ER.
			The report refers to the Water Environment (Controlled Activities) (Scotland) Regulations 2005 as aiming to put in place pollution protection measures it would be more accurate to say that they set out the process by which activities that have the potential to affect Scotland's water environment are regulated.	To be amended within the ER.
			The report states that the "MIR should not exacerbate flood risk and should where possible reduce flooding issues through the provision of well designed infrastructure in all new development." In line with SPP7, the MIR should go further than to not exacerbate flood risk and make sure that new development avoids flood risk in the first instance. SEPA has a new Interim Position Statement on Planning and Flooding which outlines our role and policy position on flooding relative to land use planning. The statement strongly advocates that the starting point for development plans should always be the avoidance of flood risk in the first instance. The position statement is available on our website at <a href="http://www.sepa.org.uk/about_us/policies.aspx">http://www.sepa.org.uk/about_us/policies.aspx</a> .	In the ER, this will be amended to state that new development should avoid flood risk in the first instance. This has been one of the key issues for the ER and the LDP as the ER has advocated the avoidance of flood risk areas, however, for planning reasons, a management approach has been adopted in the flooding and development policy.
		Appendix A: PPS Review	We consider that the PPS listed in Appendix A provides a good start at providing a background framework to the development of the Plan. There are a number of other PPS which we suggest are also considered and these are outlined below.	Comment noted.
			In relation to flood risk, the Directive on the Assessment and Management of Flood Risks (EC Directive 2007/60/EC). The Floods Directive's aim is to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity ( <a href="http://ec.europa.eu/environment/water/flood_risk/index.htm">http://ec.europa.eu/environment/water/flood_risk/index.htm</a> ). Note that this may also be relevant to the climate change receptor.	The PPS review will be updated for inclusion in the ER. The updated PPS review will include these.
			The Flood Risk Management (Scotland) Act 2009. Includes specific measures for a more joined up and coordinated process to manage flood risk at a national and local level ( <a href="http://www.opsi.gov.uk/legislation/scotland/acts2009/pdf/asp_20090006_en.pdf">http://www.opsi.gov.uk/legislation/scotland/acts2009/pdf/asp_20090006_en.pdf</a> ).	
SEPA's Interim Position Statement on Planning and Flooding which outlines SEPA's role and policy position on flooding relative to land use planning ( <a href="http://www.sepa.org.uk/about_us/policies.aspx">http://www.sepa.org.uk/about_us/policies.aspx</a> ).				
In relation to waste water infrastructure, Scottish Waters Strategic Asset Capacity and Development Plan, which sets out the services and investment that it intends to undertake in order to meet its				

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			<p>environmental obligations (<a href="http://www.scottishwater.co.uk">www.scottishwater.co.uk</a>). Note that this may also be relevant to the material asset receptor.</p> <p>In relation to bathing waters, the Bathing Waters Directive (EC Directive 76/160/EEC). Its main objective is to protect public health and the environment from faecal pollution at bathing waters (<a href="http://www.defra.gov.uk/environment/water/quality/bathing/default.htm">www.defra.gov.uk/environment/water/quality/bathing/default.htm</a>).</p> <p>As well as referring to the River Basin Management Plans in the baseline issue table 3.1 you may want to also refer to them in appendix 2. The plans set out the proposed arrangements for River Basin Management Planning in each of Scotland's two River Basin Districts (<a href="http://www.sepa.org.uk/water/river_basin_planning/early_basin_planning_work.aspx#Draft_RBMPs">www.sepa.org.uk/water/river_basin_planning/early_basin_planning_work.aspx#Draft_RBMPs</a>).</p>	
		Current State of the Environment.	<p>Table 3-1: Baseline Issues and Implications, provides the start of a good baseline for those aspects of the environment where we have an interest, however, we have suggested a small number of additions below.</p> <p>Under the water section of Table 3-1, it refers to development not occurring in areas of flood risk unless adequate flood mitigation measures are put in place, we would suggest changing this wording in line with SPP7.</p> <p>SPP7 states, " a development which requires additional flood alleviation or prevention measures to address flood risk from any source, is likely to be acceptable only outside or adjoining the boundary of "medium to high" risk areas."</p> <p>It would be useful if the baseline information on material assets included details of the existing capacity of the available drainage infrastructure (identifying any limitations). The provision of adequate drainage infrastructure to support new development will be a key consideration for the assessment of potential adverse effects of development on the water environment. For your information we would consider any allocations which do not connect to the public sewage system as having a significant negative effect against the water environment receptor.</p>	<p>Comment noted.</p> <p>Noted. Wording will be amended within the ER.</p> <p>Comment noted.</p>
		Scoping of Environmental Issues.	<p>SEA should play a role in informing the assessment of plan options and proposals by identifying any likely significant environmental effects early on in the process. Therefore the baseline information should include an assessment of the current extent of flood risk through the inclusion of a Strategic Flood Risk Assessment or other similar approach. If an assessment of flood risk is carried out early in the plan making process it will be easier to introduce and promote the primary principle of avoidance. It is also possible that proposals in adjacent local authority areas could affect flooding within the South Ayrshire Council area and vice versa thus it is important to work closely with other local authorities to ensure a strategic approach to flood risk assessment.</p> <p>It should be noted that the Flood Risk Management (Scotland) Act 2009 places a general duty on responsible authorities to adopt an integrated approach to co-operate with each other in the exercise of their functions, possibly through agreements.</p>	<p>Comments noted and agree that an SFRA should be conducted at this stage of the process dependant on the production of a list of proposed development sites within the MIR.</p>
		Development of SEA Objectives.	<p>One of the SEA water objectives is to "mitigate any potential flood risk from or to any new development", we would ask that "mitigate" is replaced with "avoid".</p>	<p>Noted. Will be amended within the ER.</p>
		Framework for	<p>It is understood that the plan's vision, objectives and general policies and proposals will be assessed</p>	<p>Comment noted.</p>

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		Assessing Environmental Effects.	against the SEA environmental objectives, analysis questions and the environmental baseline. This is considered an acceptable method of assessment.  For the avoidance of any doubt we would expect all aspects of the Plan that are likely to have significant effects to be assessed. This should include, for example, strategic objectives, policies, proposals and site allocations.	
		Mitigation.	SEPA would expect the Environmental Report to include full details of mitigation measures. SEPA considers that mitigation measures are a crucial part of SEA in that they offer an opportunity to not only address potential adverse effects of a plan, but also to make a plan even more positive than it already may be. These should follow the mitigation hierarchy: avoid, reduce, remedy or compensate for negative effects, and enhance where appropriate for positive effects.  It would be helpful to set out all mitigation measures in a way that clearly identified: (1) the measures required, (2) when they would be required and (3) who will be required to implement them.	Methods for establishing Mitigation Measures will be outlined in the ER Assessment Methodology chapter. The ER will also clearly identify any mitigation measures put forward, when they are required and who will be required to implement them.
		Cumulative Effects Assessment.	The report states that residual environmental effects will be taken forward to the cumulative assessment process. It should be noted that a policy/proposal in the plan could have insignificant effects but together with other policies/proposals in the plan could have a significant effect. Therefore the cumulative effects assessment should assess the combined environmental impacts of all policies/proposals and not only assess residual environmental effects.	Both beneficial and adverse residual effects will be considered after mitigation and these will be put forward into the cumulative assessment so therefore the combined environmental effects will be considered.
		Consultation Period.	We are satisfied with the proposed consultation period of 6 weeks for the Interim Environmental Report (ER).	Noted.
SNH	General Comments	General Comments	Overall, SNH agrees with the environmental issues, which have been set out in your Scoping Report. However, there are three specific details that need further consideration.	Comment noted.
			The report should make reference to European Protected Species such as bats, and otters as the Local Plan policies will have to adequately consider the protection of these species out with designated areas.	Comment noted. The Environmental Baseline will be updated to include this information and the SEA objectives amended accordingly.
			An Appropriate Assessment of the impact of the plan on SPAs and SACs will also be required (see attached appendix).	Noted.
			SNH is aware of the ongoing development of the Biosphere reserve proposals for the southern part of the plan area. The opportunities arising from this proposal are of sufficient magnitude to suggest that this project should be addressed through the Main Issues Report (MIR) and the SEA process.	The potential Biosphere reserve is discussed in the Baseline Report. Possible amendment of the SEA Biodiversity objective to recognise this.
		We note and accept the proposed consultation period for the Environmental Report.	Noted.	
	Appendix: Detailed Comments	Para.3.1: Vision	„The LDP will be a spatial development strategy that contributes to sustainable Economic growth, underpinned by sound social and environmental objectives.“  Whist the proposed „vision“ above, does infer a balance between development and social and environmental considerations the next section describing the focus of this vision infers primacy of	The environmental assessment of the preferred option for the vision and its alternatives will take note of the suggested alternative and conduct an

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			<p>increasing opportunities over promotion of social and environmental:</p> <p><i>The LDP will concentrate on primarily increasing opportunities for business Development, investment and employment, with an integral part of the strategy also to promote both social and environmental objectives.</i></p> <p>If the proposed vision is a balance between development and the environment, SNH recommends the text could be altered to more clearly express this by substituting the word „underpinned „ with „guided“ . Thus this vision statement could be expressed as follows:</p> <p><i>„The LDP will be a spatial development strategy that contributes to sustainable Economic growth, guided by sound social and environmental objectives.“</i></p>	assessment on this option.
		3.2.1: PPS Review	<p>The Act requires that they (MIR) set out the PA's general proposals for development and in particular proposals as to where development should or should not occur, and we would expect that one or more reasonable alternative sets of proposals should be presented – SNH Guidance.</p> <p>The MIR should protect European and National sites from the adverse effects of Development.</p>	<p>This is an issue for the MIR and should be included in the final MIR.</p> <p>The Biodiversity SEA objectives developed include protection of international, national and local biodiversity sites and their enhancement where possible.</p>
		3.2.3: Biodiversity, Flora and Fauna.	<p>As well as the requirement for Appropriate Assessment for development proposals, SNH reminds the planning authority that, in line with Scottish Government guidance, development plans and MIR themselves require to undergo Appropriate Assessment as outlined in the publication; „Scottish Executive guidance on appropriate assessment of development plans“. Links to this and a summary of SNH advice on this is included in the attached leaflet.</p> <p>To ensure such assessment takes account of pertinent information, the ER should include information on the reason for the designation of these protected sites and comments on any likely effects of the plan, both threats and potential benefits.</p> <p>SNH welcomes the comments in the final part of this section on implications which states:</p> <p><i>“Future development should avoid where possible any negative impacts on South Ayrshire’s ecology and preferably seek to improve and enhance the biodiversity resources in the South Ayrshire Area.”</i></p>	<p>Comment noted and agreed that an AA will be required. This will be discussed with SAC.</p> <p>Within the ER and accompanying baseline report (Appendix C), there are details of the reasons for the designation of protected sites and threats.</p> <p>Comment welcomed.</p>
		Landscape	SNH further expects the MIR seek to enhance, improve or restructure landscapes as noted in the paragraph above in this Scoping report with reference to the Ayrshire Landscape Assessment.	Landscape SEA objective 1 covers this aspect stating that the MIR should protect and enhance the area’s landscape character and designated Scenic Areas.
		Human Health	SNH welcomes the MIR aim to contribute to physical health. In taking forward Scottish Government NPF there is merit in MIR including reference to mental health as well as physical health and the ER including assessment of likely impacts from the MIR on well being as well as physical health.	<p>SEA Health objective1 and analytical question modified slightly to:</p> <p><i>Objective 1: To enhance and protect human health &amp; also promote healthy living through improved active travel opportunities, particularly for walking &amp;</i></p>

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				<p><i>cycling.</i></p> <p>Associated question: <i>Does the policy/proposal facilitate healthy lifestyles and address safety concerns which may have health effects both physically and mentally, e.g. due to noise and flooding?</i></p>
		Para.3.4.	<p>Please refer to the attached leaflet and guidance at: <a href="http://www.scotland.gov.uk/Publications/2006/06/02093425/0">http://www.scotland.gov.uk/Publications/2006/06/02093425/0</a> with regard to the implications for the MIR and Local Development Plan arising as a result of the presence on Natura sites in South Ayrshire. As a result the text covering the need for Appropriate Assessment to state: "...within close proximity to or likely to affect these."</p>	Comment noted. The text will be amended in the ER as necessary.
		Table 1.	<p>In the row titled „Biodiversity..“ SNH recommends that under the column „Implications for the MIR“ , that as well as noting the names of the sites the implications will include , the requirement for an Appropriate Assessment as noted in the earlier text para 3.4.</p>	Comment noted and text will be amended for the ER.
			<p>In the row titled „Landscape“ SNH recommends under the column on „Implications“ the MIR the degree to which MIR can address enhancement of landscapes should be included which can then be included in the ER. Under the column on „Sources“ the „Ayrshire Landscape Assessment“ undertaken by Land Use Consultants should be noted.</p>	Comment noted and will be amended in any text within in ER.
			<p>In the row titled „Human Health“, SNH notes implications for the MIR on human health include increasing opportunities for walking and cycling. SNH recommends that, as well as improving opportunities, the quality and availability of walking and cycling facilities is assessed in the ER as the aim of increasing the walking and cycling rates will depend both on quantity of opportunity as well as the quality of the facilities.</p>	<p>Comment noted. SEA Human Health Objective further altered to:</p> <p>Objective 1: <i>To enhance and protect human health &amp; also promote healthy living through improved active travel opportunities, particularly the quality of and availability to walk &amp; cycle.</i></p>
		4.3: SEA Objectives and Analytical Questions.	Table 4.1. Analytical question for landscape should include question on potential landscape benefit.	<p>Comment noted. Analytical question for the Landscape Objective altered to:</p> <p><i>Could the policy/proposal have a beneficial or adverse effect on designated Scenic Areas or the landscape character of an area?</i></p>
		Appendix A: PPS Review.	<p><i>Table A1-1: PPS Review - EC (Habitats) Directive 1992/42/EEC</i></p> <p>SNH advises that the comments on this legislation require clarification and revision.</p>	Comment noted. Will be changed within the ER.
			<p>South Ayrshire Council is reminded that all PPS including the MIR and LDP require to be screened to ascertain the need for that plan to be subject to Appropriate Assessment. As South Ayrshire Council area contains Natura sites, SNH suggests that the MIR and consequent LDP will be subject to Appropriate Assessment. See Scottish Executive guidance on appropriate assessment of development plans at: <a href="http://www.scotland.gov.uk/Publications/2006/06/02093425/0">http://www.scotland.gov.uk/Publications/2006/06/02093425/0</a></p>	An Appropriate Assessment Screening Report will be conducted on the MIR in response to this comment.

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			In terms of proposed development, there is no specified maximum distance from a site boundary beyond which proposals can be dismissed as having no effect and reference to 10km should be omitted in this section and not included in the ER. It would be more accurate to describe the requirements of this legislation under such circumstances as; "...Natura 2000 sites require Appropriate Assessment if development is either within, adjacent to, or will cause a likely significant effect on a European site. Confirmation from Scottish Natural Heritage should be sought on this..."	Text will be omitted in the ER and replaced with more appropriate wording.
		Para.3.1	<p>Para 3.1. The MIR will appraise options for a strategic vision for the LDP, setting out a preferred vision and alternatives. The report assures us that:</p> <p>The LDP will aim to increase business, investment and employment by...</p> <p>The MIR then lists mechanisms such as strategies to achieve the aim. But for communities, built and natural resources no means of promotion (such as strategies etc) is provided. It is difficult therefore to see how the preferred vision will be achieved. The ER should identify the effects on the environment of the MIR omitting proposals for strategies to cover these issues.</p>	Comment noted and will be considered at the Environmental Assessment stage.
<b>Historic Scotland</b>	General Comments.			
	1. Scope and Level of Detail: 1.1.	General Comments.	Overall, we found the scoping report to be clear and helpful, and subject to the specific comments set out below and in the accompanying annex, we are content overall with the scope and level of detail proposed for the environmental assessment.	Comment welcomed.
	1.2.		Our understanding of the scoping report is that the assessment will consider the plan's vision, objectives and general policies and proposals against the SEA environmental objectives. We welcome this and assume that this will also include a detailed assessment of proposed land allocations and their alternatives.	To confirm, the assessment will cover proposed land allocations and their alternatives.
	1.3.		We note that the historic environment has been scoped into the assessment. Simply for information, chapter 1 of the Scottish Historic Environment Policy (SHEP) provides a useful definition of the historic environment. It defines that the historic environment encompasses built heritage features (ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes, as well as marine heritage) and the context or setting in which they sit, and the patterns of past use, in landscapes and within the soil, and also in out towns, villages and streets. It also recognises that the historic environment has less tangible aspects including the historical, artistic, literary, linguistic and scenic associations of places and landscapes.	Noted.
	2. Consultation on the Environmental Report.	Consultation.	We note and are content with the 6 week period proposed in section 6.1 for consultation on the Environmental Report. For administrative purposes, Historic Scotland considers that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.	Noted.
	2.2.		At the Environmental Report stage, we would prefer to receive paper copies of the report and the plan, both of which should be sent via the Scottish Government Gateway in line with the procedures set out in the SEA Tool Kit (available at: <a href="http://www.scotland.gov.uk/Publications/2006/09/13104943/45">www.scotland.gov.uk/Publications/2006/09/13104943/45</a> ).	Noted. Paper and electronic copies of the ER will be sent out via the Gateway to the Consultation Authorities.

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	Detailed Comments	Environmental Baseline Issues and Implications.	<p>Table 3-1 provides a detailed account of the information (SEA environmental baseline data/issues, implications for the MIR, baseline data required and sources of data) that will be used to inform the environmental assessment. We understand that this will include information on the following for the historic environment:</p> <ul style="list-style-type: none"> <li>• Historic gardens and designed landscapes;</li> <li>• Conservation areas;</li> <li>• Listed buildings; and,</li> <li>• Scheduled monuments.</li> </ul> <p>However, it should be noted that the environmental baseline data should also include other sites of local and regional importance and consider how these may be affected by the plan, including:</p> <ul style="list-style-type: none"> <li>• Unscheduled archaeology;</li> <li>• Archaeological sites on the Sites and Monuments Record (SMR);</li> <li>• Marine archaeology; and</li> <li>• Historic townscapes and landscapes.</li> </ul>	Comment noted and the Environmental Baseline (see Appendix C of this report) will include details of these historic features.
			<p>We also note in Table 3-1, that that the protection of listed buildings and their setting is not included under the heading „Implications for the MIR“.</p>	This section will be updated in the ER.
			<p>In the Environmental Report it would be helpful to provide separate maps showing the baseline data for the historic environment in relation to the current situation, and in relation to the proposed land allocations. This will assist consultees in identifying and/or verifying potential impacts on the historic environment.</p>	Comment noted. Will be discussed with SAC.
		Environmental Issues.	<p>Table 3-1 also includes a summary of the environmental issues which are relevant to the South Ayrshire Local Development Plan. We welcome that potential effects for the historic environment have been included here. The assessment should also consider any linkages between SEA topics. For example, flooding and climate change can also have effects on the historic environment, both in terms of direct impacts, such as the effects of increased flooding and storminess on historic buildings or coastal archaeological sites - and impacts arising from measures derived to mitigate and adapt to climate change, such as renewable energy developments or flood defences.</p> <p>It would be helpful if your Environmental Report identified key environmental issues within South Ayrshire, such as the potential for flooding and coastal erosion to affect archaeological sites.</p>	The ER includes a section on the inter-relationship between SEA topics and also identifies key environmental issues within the LA area in Chapter 3.
		Development of SEA Objectives.	<p>Table 4-1 provides a summary of SEA objectives (SEA topic, key policy implications and key baseline implications). We welcome that you would wish to „safeguard cultural heritage features and their settings through responsible design and positioning of development“. We would note however that that the protection of listed buildings and their setting is not included under the heading „Key Baseline Implications“.</p>	Acknowledged. This will be addressed within the ER.
SEA Objectives and	<p>We welcome that the SEA questions in Table 4-2 ask if the policy/proposal would have a positive or negative effect on cultural heritage features. As noted in section 1.3 of our covering letter, we</p>	As specified in the Baseline document (Appendix C), Archaeological		

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		Analytical Questions: Framework for Assessing Environmental Effects.	understand this term to mean all elements of the historic environment as outlined in the SHEP. We note the inclusion of the term „Archaeological Consultation Trigger Sites“ and would welcome clarification as to whether this relates to unscheduled archaeology and archaeological sites on the Sites and Monuments Record (SMR).	Consultation Trigger Zones relate to those sites listed on the SMR.
			We understand that this framework will be used to assess both the vision/objectives of the plan and the individual land allocations (including their alternatives). Splitting the topic into individual questions can assist the plan maker as it provides a systematic process for reviewing each allocation, highlighting the benefits and costs of each allocation. This method also assists in targeting any mitigation that may be required (e.g. specifying developer requirements for the allocation to protect the site/setting of a scheduled monument).	
			In light of this, you may find it useful to develop an additional series of prompts to assist in determining the environmental effects of each allocation. For example, will the allocation affect scheduled monuments? Will the allocation affect listed buildings? etc.	Each individual cultural heritage designation type will be considered when assessing the effects on cultural heritage using the existing questions. It is not thought necessary to have a question for every individual cultural heritage feature.
		Assessment Framework: SEA Objectives and Indicators.	We note that section 5.1 sets out the framework, methodology and significance of effect criterion which will be used to assess the environmental effects of the MIR. We note that the Major adverse effect definition refers to Moderately – should this say significantly? It would be helpful in the environmental report to refine this so that it is clear what is considered to be a significant effect (e.g. are both moderate and major considered to be significant?). It may be clearer to separate these two attributes in table 5.1 to help the reader understand how they combine to give an indication of significance.	Moderately affecting an internationally important site would have overall significance of major adverse. The definitions will be refined within the ER to make it clearer to the reader.
			Para 5.3 states that significance can be determined through the combination of magnitude of effect with the sensitivity of the receptor. While we accept that such an approach can be helpful in identifying how the actions within the plan and the receptors interact, it is important to bear in mind that not only sites of national/international status can experience significant effects. We therefore welcome that professional judgment will play a key role and that this will be supplemented with GIS/spatial information where appropriate	Comment noted.
			We note that table 5.1 also provides some guidance as to what is considered to be viewed as a positive effect. It will be important to bear in mind when carrying out the assessment that not all historic environment features lend themselves to restoration (e.g. scheduled monuments).	Noted and will be considered during the assessments.
			When documenting the environmental assessment, it would be helpful to set out any assumptions that are made during the assessment e.g. relating to implementation of the plan. We welcome the inclusion of a commentary box in the assessment matrices. It is important to provide a detailed commentary, particularly where significant effects are predicted, as this allows the reader to understand the thought process behind the conclusion.	Detailed commentary will be provided in the matrix along with any assumptions made.
		Alternatives	As noted above, we assume that the assessment framework outlined in section 5.3 will be used to assess the environmental affects of the alternatives generated during the development of the plan and its subsequent iterations. We welcome that where relevant the ER will influence the	Comment welcomed.

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			development of the plan through the provision of recommendations and mitigation measures.	
		Mitigation	<p>As you will be aware, mitigation may involve making changes to the plan and/or developing more detailed mitigation proposals to be implemented as the plan is delivered.</p> <p>It would be helpful in the Environmental Report to clearly describe any changes made to the plan as a result of the environmental assessment, and to clearly set out any recommendations or expectations for lower level plans, projects or activities that are identified as mitigation measures. It would also be helpful to identify in the report who will be responsible for ensuring that the mitigation measures are taken forward as the plan is implemented.</p>	<p>Within the ER, a table will be set up containing:</p> <ul style="list-style-type: none"> <li>- Initial assessment weighting;</li> <li>- proposed mitigation measures;</li> <li>- SAC response to measures;</li> <li>- reassessed assessment weighting; and</li> <li>- If the MIR has been altered as a result.</li> </ul>
		Monitoring.	As you will be aware, when monitoring the effects of the plan indicators chosen for the historic environment should reflect both the actions to be taken within the plan, and the potential effects identified in the course of the SEA. At the monitoring stage, you may wish to develop indicators that are closely related to the expected effects of the plan and we would be happy to discuss these with you if that would be helpful.	Comment noted. Monitoring chapter will include information on potential indicators relating to the expected effects of the plan.
		Relationship with other PPS.	<p>Table A1-1 sets out a comprehensive list of the relevant legislation and policies that protect the historic environment, including SPP 23 <i>Planning and the Historic Environment</i> and the <i>Scottish Historic Environment Policy</i> (SHEP), and we welcome that these have been included. Simply for information, the SHEP was updated in July 2009 to include a policy on historic battlefields: <a href="http://www.historic-scotland.gov.uk/index/heritage/policy/shep.htm">http://www.historic-scotland.gov.uk/index/heritage/policy/shep.htm</a>.</p>	Noted.
			<p>We note that the <i>Memorandum of Guidance on Listed Buildings and Conservation Areas</i> is not included in Table A1-1. Simply for information, this has now been withdrawn and new guidance notes will ultimately replace it. These have now been published for consultation and are available on our website at: <a href="http://www.historic-scotland.gov.uk/index/heritage/policy/memorandumofguidance.htm">http://www.historic-scotland.gov.uk/index/heritage/policy/memorandumofguidance.htm</a></p>	Noted.

## Consultation Comments on Initial Environmental Report

Consultation body	Ref.	MIR SEA ref	Consultation body comment	Response	Action for LDP Preparation
SEPA	General comments		Generally, the Environmental Report is very comprehensive, clearly set out and easy to understand. However, we do have a number of more detailed comments which are set out below.	Comment noted	None
	Detailed comments	2.2 Integration of the LDP and the SEA.	It would be useful for any revised ER to set out where the plan has changed in response to the findings of the SEA.	The updated ER will include a section which clearly identifies how the SEA has influenced the plan preparation process.	None
		2.3 Relationship with other PPS	Seeks the inclusion of the Climate Change (Scotland) Act 2009 (the associated delivery plan), the Climate Change Adaptation Framework and the Scotland River Basin Management Plan.	The updated ER will recognise these plans within the relevant section.	None
		Table 2.1 – climatic factors	<p>The „climatic factors“ section should be updated to include a section on the new SPP and the issues which have been highlighted in relation to climate change.</p> <p>Other relevant plans/legislation have been omitted including the Zero Waste Plan, the Marine (Scotland) Act, the Strategic Transport Projects Review and the Scottish Soil Framework</p> <p>There is updated guidance in relation to air, water, soil (<a href="http://www.seaguidance.org.uk/12/Legislation-and-Other-Relevant-PPS.aspx">www.seaguidance.org.uk/12/Legislation-and-Other-Relevant-PPS.aspx</a>) and climatic factors (<a href="http://www.scotland.gov.uk/Publications/2010/03/18102927/13">www.scotland.gov.uk/Publications/2010/03/18102927/13</a>) which should be included in any update ER.</p> <p>We would expect the assessment of relevant plans, programmes and strategies to be updated as and when a revised ER is prepared.</p>	The amended ER will be amended to reflect any relevant new or updated guidance. Discussions with the Gateway revealed that the ER cannot be continually updated to reflect the content of emerging documents. The main issue in this regard is to ensure that the LDP takes cognisance of these documents.	None
	General comments	Environmental baseline and issues	It would have been useful for the baseline to include reference to where the LDP will have a direct influence over the identified environmental issues.	It is considered that the LDP has the potential to affect all of the environmental issues identified within the baseline data. This is why the issues have been identified in this document.	None

Detailed comments	3.2.3 Water environment	Further detail in respect to particular areas of flood risk would have been useful, particularly in relation to the identification and assessment of sites. We note that this will be undertaken as part of the LDP preparation and would welcome, where appropriate, this additional information being provided in a revised ER.	The purpose of this section of the report is to provide a summary of the current state of the environment in relation to the individual issues identified; it is not to contain details of any site assessments. The LAF ensures that flood risk issues are taken into account in determining appropriate potential development sites. Additional details of how flood risk issues have been taken into account in conducting this assessment are set out in the revised ER.	The LDP preparation will continue to be guided by the LAF in site selection. Further detailed consideration of sites to be considered for development through release in the LDP has involved consultation with SEPA and further assessment of potential flood risk.
		The final paragraph of this section states that " <i>the MIR should not exacerbate flood risk and where possible could reduce...</i> ". SEPA would prefer that this is strengthened to state that the LDP should in principle avoid development in areas of flood risk as well as " <i>...reduce flooding issues through the provision of well designed infrastructure...</i> ". We would also encourage the LDP to identify opportunities to reduce flooding in areas already at risk.	Revised ER has been updated to reflect this comment.	It is not proposed that the LDP adopts the principle of avoidance of flood risk. Glasgow Prestwick Airport, as well as the largest towns within South Ayrshire, are affected by areas of flooding. To avoid development in these areas (as an example) would conflict with national policy (as in NPF2 and SPP) and identified national developments.
		It is also suggested that the LDP should identify opportunities to reduce flooding in already at risk areas.	This comment relates more to the content of the MIR and LDP than it does to the content of the ER.	Noted. This will be investigated as part of the development of the proposed plan.
	3.2.7 Climatic factors	It would have been useful for the MIR and the subsequent LDP to identify how the climatic issues identified will be dealt with.	SEA objectives are developed by considering relevant PPS and their associated objectives along with the current environmental baseline. The purpose of this section is to collect baseline data which will inform the SEA objectives, which will form the basis for the assessment of policies and proposals. In this regard climatic issues are dealt with by ensuring that the issues identified are taken into account when assessing the policies and proposals of the plan.	None. It should be noted that in addition to climate change being integral to the consideration of the development of LDP policies and selection of sites, the LDP will state its position on climate change via relevant policies. Climate change is also integral to the vision of the LDP.

			We would prefer to see the term “avoidance of flood risk” used as opposed to “risk of more frequent and severe flooding is minimised”.	Updated ER will be altered to reflect the suggested change.	It is not proposed that the LDP adopts the principle of avoidance of flood risk. Glasgow Prestwick Airport, as well as the largest towns within South Ayrshire are affected by areas of flooding. To avoid development in these areas (as an example) would conflict with national policy (as in NPF2 and SPP) and identified national developments.
	General comments	4 SEA Objectives, indicators and targets	We welcome the comprehensive set of SEA objectives used to underpin the assessment. In particular, we welcome the alignment of the water objective directly to the Water Framework Directive terminology and also specific reference to the need to avoid flood risk. We also welcome the climate change objectives that focus on both emissions reduction and increasing resilience of development in South Ayrshire to a changing future climate.	Noted.	None.
	Detailed comments	5.1 Assessment methodology	For information, the SNIFFER air, water and soil guidance has been significantly amended from the draft version and is now available at <a href="http://www.seaguidance.org.uk">www.seaguidance.org.uk</a> . The Scottish Government has recently published guidance on the <i>SEA of Development Plans</i> (PAN1/2010) ( <a href="http://www.scotland.gov.uk/Publications/2010/03/18102824/0">www.scotland.gov.uk/Publications/2010/03/18102824/0</a> ) and on <i>Consideration of Climatic Factors within SEA</i> ( <a href="http://www.scotland.gov.uk/Publications/2010/03/18102927/0">www.scotland.gov.uk/Publications/2010/03/18102927/0</a> ).	Updated ER will ensure that the appropriate guidance is used in developing the assessment methodology.	None.
		5.4 Assessment methodology	We welcome the comprehensive approach to the assessment of the preferred (and alternative) policy options and the potential sites. The LAF provides a clear and consistent way of assessing the potential suitability of individual sites.	Noted.	None.

	General comment		<p>The LAF appears to offer equal weight to all potential impacts. This does not reflect where a severe impact could rule a site out on its own, regardless of the remainder of the assessment. The inclusion of a "severe constraints" box in the assessment is noted and it is assumed that this will be used to address this point as decisions on what sites go forward are made.</p>	<p>The LAF represents the first stage in the process of identifying potential sites for development. It will be backed up by site visit observations. In addition the „severe constraints“ box does provide an opportunity to present any significant issues of concern.</p> <p>In addition, the updated ER sets out the methodology used as part of the LAF, why such methodology was adopted and the outcomes of this process.</p>	None.
		6 Environmental Assessment	<p>Overall the assessment findings are clear and comprehensive. We welcome the breadth of policy options and alternatives that have been tested.</p>	Noted.	None.
			<p>We are supportive of the approach in determining and applying suitable mitigation measures, however it does require some certainty that a mitigation measure will actually occur in order for the identified revised score to be realistic. Accordingly, we consider that a robust framework for delivering the mitigation measures is important.</p>	<p>In this regard the purpose of the SEA is to determine suitable mitigation measures where they are appropriate and required. It is not for the SEA to ensure that the mitigation measures will be taken forward in the plan itself. The SEA will simply consider where mitigation could improve the environmental performance of the Plan and make an assessment of the policy or proposal following the application of a mitigation measure. However, it can be taken that where there is a response by South Ayrshire Council and that a suggested amendment is accepted, that this will be taken forward into the LDP.</p>	<p>Where environmental recommendations are made, they are reviewed by a supervisory officer with responsibility for overseeing the LDP process. The recommendations are all reviewed and an indication of whether the recommendation is accepted or not is given. Where recommendations are accepted, the LDP team reviews all policies to ensure wording is consistent with recommendations. An audit check is undertaken following amendment of policies to ensure policies have been altered to reflect SEA recommendations, where relevant.</p>
	Detailed comments	6.4.1 Appendix E GPIA	<p>There is a concern that development will occur around GPA where it has already been identified that there is a risk of flooding. It is suggested that all flood risks will be managed rather than avoided. This contradicts the flood risk objective set out in Table 4.1 and also SEPA's interim position statement on planning and flooding.</p>	<p>To ensure that there is consistency throughout the SEA it is recommended that SEPA's advice on this matter should be taken into account to ensure that areas of flood risk are not developed and thereby not exacerbating existing problems.</p>	<p>It is not proposed that the LDP adopts the principle of avoidance of flood risk. To avoid development at Glasgow Prestwick Airport would conflict with national policy (as in NPF2 and SPP) and identified national developments.</p>

			<p>Given that there is an identified flood risk at this location which will have to be managed, that a negative is recorded under both the initial and post mitigation weightings. This should also apply to alternatives considered.</p>	<p>The preferred policy option states that flood risk issues will be addressed at a more detailed stage where the development impacts on flooding or vice versa. It is considered that although a negative impact would be possible, that there is still an element of uncertainty as the location of development is not clear at this stage. A more appropriate scoring would be “+/-”.</p>	None.
			<p>The Climatic factors section is scored as “+/-” due to negative impacts as a result of increased emissions from increased airport activity and conversely, for the promotion of land in connection to the renewable sector. It is considered that the negatives that would be imposed by increased aircraft activity significantly outweigh the positives that could emerge in association with developments related to the renewable industry. The scoring should therefore be changed to reflect this. A scoring of “+/-” is suggested.</p>	<p>The policy has been altered and re-assessed. An overall weighting of “+/-” has been applied.</p>	None.
		Meeting housing needs	<p>By focusing on the higher threshold target, there is the potential for more significant environmental impacts to be generated – due to the increased scale of development that the increased threshold will likely generate. Accordingly, we feel this should be recognised in the assessment, although we recognise that this policy does not deal with specific sites but with the level of allocation and therefore that more detailed assessment will fall to consideration of individual sites to support the higher threshold.</p>	<p>It is agreed that by selecting a higher threshold target that there is a greater chance of significant environmental impacts. However, as noted in the consultation comments, no specific sites are identified. It would be inaccurate to identify negative impacts at this stage of the assessment without knowing what the specific sites are. The strategic nature of this policy option creates difficulties in identifying potential impacts and this is reflected in the scoring for that policy within the ER. A more detailed and therefore accurate level of assessment can take place when considering individual sites.</p>	None.
	Detailed comments	Housing growth strategy	<p>Generally we are content with your assessment for this policy area. In particular, we welcome the mitigation as applied to the preferred policy option (and indeed the alternative options) which refers to the need to avoid flood risk and to prioritise development on brownfield and derelict land.</p>	Noted	None.

		Ayr and Troon Ports	<p>We note the assessment identifies the risk of flooding in these locations and welcome the mitigation that refers to avoiding areas of high to moderate flood risk.</p> <p>With respect to the preferred option to prepare a traffic management plan, we note the identification of potential benefits for air quality from this. While we do not contest this, we would recommend that the management plan identifies routes that avoid areas that are already experiencing poor air quality as set out in the environmental baseline.</p>	<p>Comments noted. In reference to the comments made on the traffic management plan, it is envisaged that this would have to go through its own environmental assessment process and that the appropriate issues will be addressed at this stage.</p>	<p>None directly for LDP. Related documents will be appropriately environmentally assessed at the appropriate time.</p>
		Craigie Estate	<p>We welcome the identification of the need to avoid land at flood risk on the Craigie site. The mitigation measure clearly states that development in this area should avoid flood risk and we would expect the indicative masterplan to reflect this.</p>	<p>Noted</p>	<p>As per proposed policy.</p>
		Coast	<p>We agree with the assessment findings with respect to water, which recognises the objectives set in the Scotland River Basin Management Plan and the risk of coastal flooding. Despite these being recognised in the assessment and contributing to the negative score, no mitigation measures appear to have been identified. We would welcome inclusion as a mitigation of the sentence in the assessment which says "<i>coastal development should be sited appropriately to avoid effects associated with the management of current and projected flood and erosion risk</i>".</p>	<p>Revised ER will be amended to include this recommendation.</p>	<p>This will be considered in the amended recommendation on this policy assessment.</p>
		Flooding	<p>We broadly welcome the intention to develop a policy requiring developers to prepare a flood risk assessment to accompany applications in areas of flood risk.</p> <p>We are content with the findings of the assessment of this policy option.</p>	<p>Noted.</p>	<p>None.</p>

		Waste Management – policy to be re-written in any case	Clearly there are considerable uncertainties regarding the environmental effects of this policy as it is dependent upon the findings of the Ayrshire Joint Strategic Waste Management Project Group. We assume that the proposed plan will include a policy that implements the recommendations made by this group. It is likely that the policy may result in significant environmental effects and accordingly there will likely be a need for a specific assessment of this policy as part of the revised Environmental Report in order to clarify the many uncertainties. We will provide more detailed comments on this when such information is available.	The Council have still not obtained the finding of the AJSWMP and has therefore decided to adopt a criteria-based policy in an attempt to ensure that waste management facilities are directed to the most appropriate locations. Again, the impacts of this policy are largely uncertain as the outcomes would be dependent upon where such a facility was to be located.	A criteria based policy has been produced in an effort to ensure that waste management facilities are directed to the most environmentally acceptable locations.
		Meeting infrastructure needs	We recognise that the effects of this policy are uncertain and that they will depend upon individual needs on specific sites. Accordingly, we are content with the assessment. We make specific reference to the proposed policy in our response to the MIR.	Noted.	None.
		Housing Site Assessment - LAF	The scoring system appears to assume an equal weight to all potential impacts and that this has the potential to mask specific very significant impacts.	The scoring system is purposely simple to ensure that it can be easily understood and quickly read. It is recognised that providing various weights to reflect different impacts would, potentially be useful. However the current scoring system does contain a „severe constraints“ box to ensure that potentially significant constraints are recognised and accounted for. In any case, this assessment represents the first stage in the process of determining potentially appropriate sites for development. This has been backed up by a detailed assessment of constraints, which makes recommendations where constraints are impacted upon.	None.
		Monitoring strategy	In table 8.1, there is reference to SEPA being responsible for monitoring whether there is a “ <i>reduction in number of new developments built in areas of flood risk</i> ” under both water and climatic factors. For clarity, we provide advice with regard to flood risk to enable Local Authorities to make informed decisions when deciding planning applications, but the decision rests with the Planning Authority and therefore the monitoring in this regard should rest with SAC.	Monitoring strategy has been altered.	None.

			With regard to climate change and climatic factors, it should be noted that our Indicative River and Coastal Flood Map (Scotland) does not include an allowance for predicted climate change effects. As such, including an allowance for climate change in flood risk assessments should be explicitly mentioned in Table 8.1 and section 6.4.7. For example, the indicator "Decline in number of properties built in areas of flood risk <i>including an allowance for climate change.</i> "	Section 6.4.7 simply summarises the outcomes of the environmental assessment. If it is not contained within the policy then it will not be reflected within the assessment. Table 8.1 will be amended to reflect the suggested wording.	Flood risk policy has been amended to ensure that development proposals make an allowance for the future effects of climate change.
		Consultation	Layout of Appendix B is supported, however there are a couple of our comments which we still consider to be outstanding and that should be taken into consideration as the LDP and any revised ER is prepared.	Noted	None directly from this comment.
			We suggested that it would be useful if the environmental baseline contained information about existing capacity of the drainage infrastructure (identifying any limitations). This did not appear to be included in the baseline or in assessment of the policy options, although we welcome the fact that this was identified as a constraint in the Land Assessment Framework. We anticipate that its inclusion here will ensure that such issues are fully considered in identifying which sites go forward.	The Council have explored infrastructure constraints as part of the LAF and have identified sites accordingly. Scottish Water have been in contact throughout the process of preparing the MIR and proposed plan as to where there are drainage constraints to ensure that development is directed to the most appropriate and sustainable locations. A brief outline of identified infrastructure constraints highlighted by Scottish Water is set out within the baseline information.	None.
			We suggested that the baseline should include a Strategic Flood Risk Assessment (SFRA). While there is a summary of flood risk in the baseline, no SFRA appears to have been undertaken at this stage. The MIR does however refer to the fact that " <i>the new LDP shall identify broad areas where consideration of potential flood risk or mitigation/management measures will be required in order that future flooding problems are not created by new development</i> ", which we assume will take the form of an SFRA and which will occur between now and publication of the proposed LDP. We also recognise that each of the sites assessed in the Land Assessment Framework were considered for flood risk and SEPA is content that this provides sufficient information about flood risk across those sites being actively considered. Accordingly, we are content that this suggestion in our scoping response is being taken forward.	The Council will produce a SFRA along with the proposed plan. It is considered that the LAF does present a more detailed level of assessment in terms of identifying the most suitable locations for new development, formally taking into account any areas at risk of flooding.	The consideration of the proposed LDP will have regard to the outcomes of the SFRA in strategically directing development.

		Next steps	We note the intention, where necessary, to update the Environmental Report to take into account additional information within the LDP as it is progressed to Proposed Plan stage and the commitment to issue the revised Environmental Report for further consultation at that time. This is welcomed. There are some specific areas noted above where we consider that additional information and assessment may be necessary.	Noted	None directly from this comment.
SNH	General comments	General comments	<p>We are satisfied the ER has addressed the issues as required by Schedule III of the Environmental Assessment (Scotland) Act 2004 and has followed the layout suggested by the SG SEA toolkit. SNH acknowledges the high standard of the report submitted and welcomes the approach to management of data implemented in the report design.</p> <p>The report successfully addresses its key objectives, those being, to describe and evaluate significant effects (positive and negative) of implementing the proposed policy options. The effects of alternative policy options are also evaluated and measures to avoid, reduce and offset any significant adverse effects comprehensively explored.</p>	Noted	None.
	Detailed comments	3.2.1 Biodiversity, flora and fauna	Table 2-1 in Section C2.1 does not list the conservation objectives of the identified sites. To ensure the correct assessment is made it is important one of these questions refers to the conservation objectives and these should be included in the ER and these are available on SNH's web site. A question should be included which asks: „Will the development affect the Conservation Objectives?“	<p>This section has been updated to ensure that the conservation objectives, along with site integrity are considerations through the assessment process.</p> <p>In addition, the Plan has been subject to a Habitats Regulations Appraisal which has comprehensively and specifically addressed any impacts of the Plan upon any Natura 2000 sites.</p>	None.
		3.2.3 Water environment	<p>A significant issue adversely affecting the water, and more specifically, coastal environment of South Ayrshire which has been overlooked by the report is that of the invasive Carpet Sea Squirt <i>Didemnid vexillum</i>. The rate at which this organism can multiply and spread represents significant threat to native marine biodiversity. The organism can be transferred from port to port via the hulls of boats and significant population have already been identified in ports which feed South Ayrshire such as Belfast.</p> <p>This point should be addressed in C4.2.5 Coastal Area – General Condition and Threats.</p>	The baseline data within the updated ER will include this information.	None.

		<p>3.2.4 Soils and Geology</p>	<p>The ER should recognise the value of the peat resource within SA as an important sink and resource for carbon capture in the effort to counter/delay the onset effect of climate change. Damage and destruction of peat bodies should be avoided at all costs and policies strengthened to steer development away from these highly sensitive and valuable areas. Overlaps with climate change policy options as part of the SEA should be established. Monitoring of the extent and condition of peat soils could be included in Table 8-1: Monitoring Strategy under the SEA objectives on Soils or Climate Change to measure the environmental impacts.</p>	<p>It is recognised that although impacts upon peat resources were a consideration in the initial assessments which took place, that this was not made explicitly clear. Impacts upon peat resources falls within the „soils and geology“ topic and any impacts upon such resources formed part of the considerations within the assessment of policies and potential development sites.</p> <p>It is recognised that there are overlaps with climate change and this is something which is evidenced in the policy assessments where relevant.</p> <p>The monitoring strategy has been amended to monitor the extent of peat resources within South Ayrshire.</p>	<p>The assessments have been updated to include specific reference to peat resources where necessary.</p> <p>Through paying specific attention to impacts upon peat resources, the most effective method of dealing with impacts was to provide reference to peat within a policy in the plan. The Sustainable Development policy has been amended to ensure that impacts upon peat are taken into account in the consideration of all development proposals.</p>
		<p>SEA objectives and targets. Table 4-1</p>	<p>No SEA objectives are set for CSGN in the topics we would expect such as biodiversity, landscape, human health, climate change. How the MIR affects or addresses the goals of CSGN will be an important indicator for these topics.</p>	<p>SEA objectives are determined through the process of identifying the objectives of relevant PPSs in conjunction with issues raised through the collection of baseline data. It is not anticipated that this exercise can encompass every objective from every relevant PPS. Notwithstanding, some of the objectives of the CSGN are inherent within the existing SEA objectives e.g. enhancing landscape setting, promoting the use of vacant and derelict land etc. This has been discussed with SNH and it was agreed that the aims of the CSGN were covered by the existing SEA objectives.</p>	<p>None.</p>

		5 Assessment methodology. 5.2 SEA objectives	<p>There is no mention in table 5.1 of CSGN. If this subject was treated as protected sites as an objective in this table then the impact of the MIR on CSGN could be assessed and in this way pointers as to how to achieve the aims of the CSGN in respect of biodiversity, landscape, human health, climate change could be highlighted.</p> <p>In relation to human health, we believe the full effect of the MIR on human health could be more clearly understood if the SEA questions here related not just to policies that will facilitate healthy lifestyles and address safety concerns. We also believe they should relate to the whole spectrum of human health benefits that a LDP could facilitate such as provision and location of good quality greenspace, access opportunity etc, many of which are the goals of CSGN.</p>	<p>The CSGN does not have specific sites identified as it is simply a concept at present which has been promoted through the NPF2. All of South Ayrshire falls within the CSGN. At this stage in the plan-making process, it is not considered necessary or reasonable to identify specific sites for the CSGN and thereby ensure their protection</p> <p>SNH agreed that the existing objectives are satisfactory in respect of the CSGN.</p>	None.
		5.3 Environmental assessment	<p>The assessment methodology correctly identifies the parameters of magnitude and environmental sensitivity in determining significance however it is unclear whether or not probability, frequency, duration and reversibility together with spatial extent have been adequately incorporated into the assessment in order to fully evaluate the significance of effects. It may be that at this stage of the LDP process these other parameters are not clear but SNH would welcome clarification of assessment parameters.</p>	<p>It is considered that Table 5-2 satisfactorily sets out the assessment parameters and provides examples of the types of effects that would fit in each category. The issues of duration, frequency, probability and reversibility are all accounted for within the table.</p>	None.
		6 Environmental assessment	<p>SNH offer support for the Council's preferred vision.</p>	Noted	None.

		6.2.2 Land assessment framework compatibility assessment	The LAF relates to the 25 constraints rather than assessing the capacity of the land to cope with the various forms of development	The LAF is the first stage in assessing the suitability of sites for development. It is considered that one of the strengths of the LAF is that it does not consider the type of development that may take place on a particular site, thereby ensuring that the most significant potential impacts are accounted for in the assessment. Regardless of this, the LAF represents the first stage in the process for assessing the suitability of land for development. This is backed up by site visit information on each of the sites and a detailed study of the issues arising. Assessing sites in terms of what could potentially be developed on a site and the ability of the land to cope with such a development is considered to be a matter of detail which would be more appropriately assessed at a later stage in the process given that the ER is conducted at a strategic level.	None.
		Appendix E – Environmental assessment of policy options and their alternatives	The mitigation set out in Table tends to be generic, representing best practice applicable everywhere rather than specific solutions. As a result it is not clear as to whether previous comments have been taken on board.  The mitigation measure in question states: “Care should be taken to protect and, where possible, enhance biodiversity, marine water quality, cultural heritage assets and the local landscape character in and around the ports. Development should also be sited appropriately to avoid the risk of flooding.”	Mitigation measures seek to identify, where possible, the potential environmental performance of a policy/proposal can be improved upon. In some instances there may be a wide range of issues which can be improved upon through adapting the wording of a policy. It is considered appropriate to use generic language to ensure that the policy/proposal accounts for a wide range of impacts where appropriate.	None.
			The key issues of interest to SNH have all been catered for within the LAF. However, the LAF does not systematically address any benefits to the issues identified such as improving landscape or settlement setting and thereby could miss opportunities to promote housing where the current conditions are poor and thus achieve a benefit to issues like landscape, biodiversity and human health through enhancing open space.	The purpose of the LAF is to identify which sites are suitable or unsuitable for development, not to identify opportunities to promote housing where the current conditions are poor. In any case the LAF represents the first stage in the process of identifying potential sites for development. This has been backed up by site visit observations and a detailed study of the issues arising.	None.

		6.4.1 GPIA	SNH are concerned about the matrix for GPIA which translates that any extension to the airport and resultant increase in emissions could be offset by the identification of land around the airport for the promotion of businesses which utilise renewable energy sources.	This policy has been altered and re-assessed.	None.
			SNH believe that having regard to the goals and objectives of CSGN would be a useful basis on which GPIA Action Plan could proceed.	Noted. This is more of a comment on the content of the MIR. In any case the purpose of the GPIA Action plan is not to focus on the goals of the CSGN.	Noted. There will be no airport action plan directly linked to the LDP, CSGN issues are dealt with through the spatial strategy and green network policies which may also be applicable to development around the airport.
		6.4.2 Housing – conversion, replacement and extensions to houses in the countryside	Old traditional buildings often represent a diminishing resource with regard to roosting opportunities for European Protected Species such as bats. Thus the conversion and restoration of traditional and listed buildings can have a particular impact on biodiversity. This impact should be included in the ER to recognise this impact and allow the emergence of policy or supplementary guidance to help ensure future proposals to restore or renovate such buildings to maintain or enhance this resource.	A mitigation measure was suggested to the Rural Housing policy in order to take account of this issue.	This will be considered and responded to in the amended mitigation proposed. A decision as to whether this recommendation will be accepted or not will be stated within that assessment. Notwithstanding, it should be noted that other policies within the LDP will set out the Council's position on issues such as biodiversity.
			New housing proposals present opportunities to incorporate sustainable buildings design, energy efficiency and waste management requirements into housing.	Agreed, although this is a comment in relation to the content of the MIR as opposed to the SEA.	The MIR stated the Council's intention to develop policies related to sustainable design, energy efficiency and waste management. While these issues may or may not be specifically referenced in the LDP policy on new housing, they will be contained as separate policies elsewhere. Since the LDP policies will not be read in isolation, separate policies will ensure this issue is taken into account anyway.
	6.4.6 Green and rural economy - CSGN	SNH welcomes the policy options which promote the CSGN. However they could be improved by being strategically integrated with projects such as Greenspace for Communities and Community Woodlands.	This is a comment on the content of the MIR and not the SEA.	The LDP provides strategic support for green networks and the policy would not preclude CSGN objectives being integrated with objectives of other environmental projects where appropriate.	

			The CSGN also has benefits to human health both as a result of increased opportunity for active transport routes but also for the clear benefit to general mental and physical health that access to good quality greenspace can achieve. The ER should recognise this aspect of the CSGN in order that it may be fully considered in the MIR and emerging LDP.	The policy has been amended and re-assessed from MIR stage. Benefits in terms of human health are identified as part of the assessment.	Any suggested amendments are dealt with in the mitigation policy.
		6.4.7 Climate change - flooding	As well as the benefits noted in this section note the ER should the opportunities for enhanced biodiversity, habitat creation and maintaining wildlife corridors as many flood prone areas are along linear features such as water courses or coasts. There are also benefits to human health due to opportunity for access and recreation.	The policy is concerned with managing development which could have flooding implications; it is not considered that this process can be used for the enhancement of biodiversity. In any case, there are other policies within the plan which cover this issue.	None.
		7 Residual and cumulative effects assessment	The assessment does not consider how effects might work together in a single geographic area e.g. whether the policy options are placing too much pressure on the environment such that capacity may be breached.	<p>The ER identifies the cumulative effects for each of the preferred policy options. For those policy options which have defined boundaries i.e. GPIA, ports etc, it is evident that if there are adverse cumulative effects then this provides a sufficient assessment as to how the overall effects of the policy options work together in providing either adverse, beneficial or neutral impacts. For those policies which are generic and apply throughout the plan area, it would be extremely difficult and impractical to assess how they impact upon a specific geographic location.</p> <p>In addition, those policies which have a defined spatial element to them have been assessed in terms spatial implications. All of this information has been fed into the spatial assessment.</p> <p>The cumulative effects of the identified development sites are addressed within the ER.</p>	None.

			The assessment also fails to address cumulative effects which might arise beyond the confines of South Ayrshire to identify how it might add to (or be added to) by effects from neighbouring plans or strategies. For some elements of the MIR and LDP such as wind farm development, CSGN, access etc, the parameters of the SEA should be widened to address these issues.	Discussions took place with SNH who confirmed that the main area of concern was in relation to the visual impacts of wind energy developments. Nonetheless, a full assessment has taken place for the purposes of determining the impacts of the plan on land outwith South Ayrshire.	None.
		8 Monitoring strategy	There is a concern that the consideration for remedial action for SEA objectives is too late in the process and may miss the opportunity to influence development. In relation to one of the SEA objectives for water the timing of remedial action is stated as being "when planning applications are granted for development in areas considered at risk of flooding." Developments can therefore be granted which do not deliver the objectives.	The mitigation strategy has been re-written for reasons outlined within the strategy. In any instance it would be unreasonable to attempt to amend the plan following its adoption in order to accommodate a particular set of previously unforeseen circumstances. One of the main theories behind recent planning reforms was to create more certainty within the planning process. If a local authority was able to alter a policy as and when it did not meet an SEA objective this would remove a great deal of certainty from the process and contradict one of the main aims of the new planning system.	None.
		C2.6 Non statutory locally designated sites	Wildlife/green corridors are identified for their importance for biodiversity. Further emphasis should be placed on the importance of wildlife corridors in mitigating the effects of climate change. As climatic conditions change wildlife must migrate in order to adapt to temperature change. These corridors are vital in facilitating this movement of species in response to climatic change. SEA should acknowledge the importance of wildlife corridors under climate change policy options.	C2.6 will be updated to include this information. In terms of updating the policy options to acknowledge the importance of wildlife corridors, this is not considered necessary within this section as wildlife corridors will be afforded the necessary protection within another section of the LDP. In any case the SEA can only assess the content of the MIR. There is no mention of wildlife corridors within the climate change policy option/s. This comment would therefore be more suitable with regards to the content of the MIR.	Consideration will be given to the inclusion of wildlife/green corridors within the development of CSGN policies.
		C5.2.3 Peat resources	SEA should account for the importance of peat as a carbon sink to allow policies likely to affect peatland to be fully assessed. Policy options should be developed in recognition of this in parallel with climate change objectives.	All of the peatland areas within South Ayrshire are located within remote rural areas where most types of development are highly unlikely to take place. Impacts upon peat have formed part of the assessment from the outset, although this was not made explicit. The updated assessments have made reference where necessary.	Noted. The LDP has responded to mitigations measures suggesting the protection of peat by including this within the strategic „sustainable development“ policy. This will now form part of the considerations for all relevant planning applications.

		C8.3 Renewable energy usage	The report describes three wind farms currently in operation in South Ayrshire but we note the absence of renewable technology from the list of main issues to be addressed in the Development Plan. It is assumed that this absence is due to the fact that you are satisfied with the policy for the whole of Ayrshire recently completed by the 3 Councils in collaboration with the Joint Planning Team, and simply intend to import it into the new plan. Confirmation of this would be helpful in allaying any uncertainty on this subject.	This is a comment on the content of the MIR and not the SEA.	It is confirmed that the reason for non-inclusion of wind farms as a standalone main issue in the MIR is because the current guidance is considered to be broadly suitable for being rolled forward (subject to appropriate environmental assessment, if necessary). This is consistent with Circular 1/209 on development planning, which gives guidance on what should and should not be included in MIRs.
		Appendix F Cumulative effects assessment – Housing – Meeting housing needs	SNH would expect this to be more accurately assessed as uncertain as it is unclear as to how using higher threshold targets can be predicted to have no adverse landscape effects.	This was a policy option at MIR stage and is no longer a policy. The PSALDP has adopted a medium growth strategy and identifies a range of sites which have been selected through the adoption of an environmentally led approach. The outcomes of this assessment are set out within the ER.	None.
<b>Historic Scotland</b>	General comments		Overall the ER was found to be well written and HS are broadly content that comments made in their scoping response have been taken into account in the assessment process. However some elements were difficult to follow, particularly in relation to the status of the LAF matrix which is not reported in any detail and which adopts different methodology to that outlined in the ER.	Noted and addressed in detail below.	None.
	Detailed comments	Table 2.1	Content with the list provided in the table. For information, a new edition of the Scottish Historic environment Policy (SHEP) was published in July 2009 to include new policies on historic battlefields.	Noted.	None.
		Baseline and environmental issues	Data is comprehensive. More consideration could have been given to the benefits that the historic environment can bring in relation to regeneration and the creation of new places. In this respect the MIR could seek to not only protect historic environment features and their settings, but to look for opportunities for their adaptation and use.	This is a comment which related to the MIR and not to the ER. However, although the MIR does not explicitly state that it recognises the benefits that the historic environment can bring in relation to regeneration, it does support the reuse of traditional and listed buildings within the countryside where appropriate.	Noted. In consideration of built heritage policies within the LDP, consideration will be given to achieving benefits from the adaptation of historic environment features.
			C3.2.3 states that gardens and designed landscapes are jointly designated by HS and SNH. For info HS are now solely responsible for maintaining the Inventory of Gardens and Designed Landscapes and commenting on development proposals affecting these sites.	Noted. The revised ER has been amended to reflect this comment.	None.

		SEA objectives, indicators and targets	Table 4-1 sets out the SEA objectives for the assessment. It is welcomed that these are shown in relation to the key messages arising from the review of relevant policies. Overall, HS are content with the objective for the historic environment and the key baseline implications, although it is suggested that the Council may wish to include „and their setting" after the scheduled monument criteria in the revised ER.	The updated ER has been amended to include this change.	None.
		Assessment findings: The land assessment framework scoring matrix	The LAF is not weighted and therefore does not take account of the significance of certain effects and could lead to environmental effects being balanced against other considerations (due to the fact that the 25 constraints not only relate to environmental issues). For the purposes of SEA, this could result in underplaying the likely effects of implementing the plan and missing opportunities to mitigate.	<p>All of the 25 (now 27 including LB's and conservation areas) constraints identified within the LAF relate to an element of the environment. The constraints were developed through consideration of each of the SEA topics contained within schedule 3 of the Environmental Assessment (Scotland) Act 2005 and expanding on particular issues where it was considered appropriate and necessary to do so.</p> <p>The scoring methodology is set out in the ER, however, at the stage of assessing whether any site affected a constraint indicator, this was simply to flag the likely impact, so that detailed consideration of the impact could occur at a later stage. Later phases of the site selection process give a qualitative analysis of the impact of the development of a site on an existing or predicted constraint, and how mitigation (including avoidance) could be employed to offset the adverse impact.</p> <p>This process ensures that appropriate weight and consideration is given to each environmental impact, at an appropriate stage. This allowed later filtering processes to remove sites from consideration where environmental impact was considered unacceptable.</p>	None.

			<p>It is not clear whether the matrix is intended to form part of the ER. The ER does not contain a comprehensive summary of the LAF/RAG findings or any details of the scoring system which is different to that outlined elsewhere in the ER. It would have been helpful if the ER had included the matrix table in its appendices together with a clear commentary outlining the criteria that have been used in applying the scoring. This would have provided a clearer picture of how the environmental assessment has influenced the spatial strategy in the MIR.</p>	<p>The matrix is intended to form part of the ER and it will be included as an appendix to the revised ER which will accompany the LDP.</p> <p>Although the ER does not provide a comprehensive summary, it does attempt to briefly summarise the findings of the LAF at 6.3. The revised ER will contain maps in its appendices which show the full results of the LAF exercise.</p> <p>Details of the criteria that have been used in applying the scoring system are briefly outlined at 5.4.2. The revised ER contains full details of the scoring system.</p> <p>In term of how the assessment influenced the spatial strategy, this will become clearer when a detailed summary of the findings of the LAF is presented.</p>	None.
		Compatibility assessment: land assessment framework	<p>It is HS's understanding that the compatibility assessment in relation to the LAF aims to show that environmental considerations have been taken into account in determining the parcels of land which are suitable for development. There is concern that in this respect that the criteria do not include opportunities for identifying effects on listed buildings or other locally designated built heritage. It may have been advisable if you had provided details of the proposed criteria for the site assessment at the scoping stage to allow us to ensure that all aspects of the historic environment were represented.</p>	<p>The purpose of the compatibility assessment is to determine the most suitable criteria for the LAF. Options for the most suitable criteria are assessed against the environmental objectives for each of the environmental media. The options which show the highest degree of compatibility are taken forward into the LAF. It is acknowledged that listed buildings and conservation areas are not included in the matrix. The LAF has been amended to include LB's and conservation areas.</p>	None.
		Environmental assessment of policy options and reasonable alternatives (appendix E)	<p>The assessment of the spatial or Housing Growth Strategy (north/south of the area) identifies the potential effects of development for the historic environment, but does not specify from which particular proposals or land parcels the effects will arise.</p>	<p>This is a general policy which does not apply to any particular parcels of land. It is important to note that no parcels of land have been identified as being suitable for development at this stage. The reasons for applying a „?“ and then a „+“ after mitigation are outlined in the ER.</p> <p>The LAF provides an assessment of individual land parcels.</p>	None.

			<p>It is noted that the LAF which accompanies the MIR does contain an assessment of each site against a number of criteria including environmental objectives. However this adopts a different methodology to that used in the environmental assessment and does not appear to reflect the content of the ER.</p>	<p>The ER has been updated to clarify how the LAF was undertaken and why it adopted the methodology that was used.</p>	<p>None.</p>
			<p>One example of where more information would have been welcome relates to the allocation/land parcel 2 (ID 2 # 2) identified in the MIR includes the scheduled monument, Property in the Care of Scottish Ministers and Category A listed building Dundonald Castle. This is a significant and impressive defensive monument and an important visitor attraction. There is the potential for development in this area to impact on the setting of this castle, although some small-scale development may be possible further to the south of the castle. I note that the LAF scoring matrix acknowledges that this site may have a negative impact on scheduled monument. In my view, it would have been useful if the SEA contained this information and went on to identify likely effects together with suitable mitigation to ensure that they are taken into account in developing the Proposed Plan.</p>	<p>The LAF represents the initial stage in the assessment process for determining the most suitable sites for development. Later stages in the site selection process include, a detailed analysis of identified constraints followed by filtering out of sites that are environmentally unacceptable.</p> <p>The site in question has been removed from final consideration, due to its environmental impact.</p>	
			<p>In terms of site selection it would have been beneficial to have documented the key findings of work such as the call for sites within the ER. This would have made the assessment easier to understand and would have offset any need for further consultation at a later stage. We understand that you intend to prepare a revised ER to accompany the Proposed Plan. This therefore provides an opportunity to draw out in more detail the significant environmental effects arising from each of the preferred development locations to ensure that appropriate mitigation can be incorporated within the Action Programme.</p>	<p>Section 5.4.2 of the ER provides details of how sites were selected for the LAF. 6.3 of the ER briefly describe the outcomes of this assessment. It is accepted that these findings could be presented in more detail and this will be reflected within the revised ER.</p> <p>It should also be noted that the LAF represents the first stage in the process of identifying sites which are potentially suitable for development. This will be backed up by site visit information and a detailed analysis of the implications of developing each site contained within the assessment.</p>	<p>None.</p>
			<p>With regard to the assessment findings as presented in the ER, I note that positive effects have been identified for the historic environment where a proposal or policy is found to protect the historic environment in line with the SEA objective. It is questioned as to whether maintaining the status quo by protecting assets would result in significantly positive effects for the historic environment. It is the view of HS that in order for positive effects to arise the plan would need to include measures to enhance the historic environment.</p>	<p>In relation to this issue, features of the historic environment are frequently threatened by the impacts of development. It is considered that policies and proposals which seek to protect and/or enhance the features of the „historic environment“ merit the prediction of a positive impact in light of what could happen in their absence.</p>	<p>None.</p>

			<p>The ER does not provide a detailed assessment of the existing policies to be carried forward from the previous plan. It would be helpful if the revised ER could provide an assessment of these policies to look at their compatibility as well as synergistic and cumulative effects of implementing the plan as a whole. In particular you should consider existing policies in light of new policies that have been developed since their conception, for example those included in the SHEP for historic battlefields. To help keep this process concise, it may be possible to carry out a mini-screening exercise on all the plan policies to assess their likely effects, and then explore any potentially significant effects in more detail. I would be happy to discuss this further with you.</p>	<p>The revised ER will be updated to reflect these comments. This will be a significant piece of work which may alter parts of the existing ER where policies from the previous plan have to be carried over overlap with any of the issues identified within the MIR.</p> <p>The LDP Historic Environment Policy will be supplemented by supplementary guidance, which will contain a policy position on battlefields.</p>	None.
		Monitoring strategy	<p>The monitoring strategy in the ER is clear. The indicators relate to potential positive effects of the plan through the reuse and regeneration of historic buildings. You may also wish to consider including indicators for potential negative effects arising from the implementation of the plan. For example, an indicator could be included which measures the number of planning applications granted where a negative effect on the historic environment is predicted.</p>	<p>The monitoring strategy has been altered as it was considered that the indicators that were previously suggested were difficult to measure and would not provide an accurate reflection of the performance of the plan in respect of cultural heritage. There are also issues in terms of the resources which are available to conduct a monitoring exercise and therefore the monitoring strategy has been simplified. Indicators have been based upon information which, to some extent, is readily available; however, this has not led the strategy. In respect of cultural heritage it was considered that the most important issue was to safeguard cultural heritage features and promote their enhancement. This is reflected in the indicator for cultural heritage within the amended monitoring strategy.</p>	None.

## Consultation Comments on Updated Scoping Report

Consultation body	Ref.	Scoping Ref.	Consultation body comment	Response
SNH	Consultation timescale	6.2 Addendum Environmental Report Consultation	The consultation period for the Addendum ER is proposed starting between December 2010 and January 2010 and is for 6 weeks. We would expect that if consultation begins in December 2010 allowance is made for the holiday period	Consultation dates have been amended.
	General comments		As background to some of our comments attached we draw the Council's attention to SNH new guidance on Habitats Regulations Appraisal of Plans in case they are not aware this is now available ( <a href="http://www.snh.gov.uk/docs/B698695.pdf">http://www.snh.gov.uk/docs/B698695.pdf</a> ).	Noted.
			We note there is no section stating the likely impact on the environment in the absence of implementing the plan and this should perhaps be added.	This will be included in the ER.
	CSGN		The emergence of CSGN as an NPF2 project is noted in the Report but there is little other reference to this. CSGN has implication for human health, Climate and Material Assets and Biodiversity, Flora and Fauna. Consultation on CSGN is currently being completed, but these issues have already been identified by Scottish Government as part of the project in its description which is viewed as leading to „a step change in environmental quality“. We would hope the potential wide ranging impacts on CSGN will be included as fully as possible in the ER and incorporated as appropriate in SEA objectives.	The MIR sets out the preferred option for how the LDP will deal with the issue of the CSGN. This was assessed in the existing ER.  In terms of the CSGN being incorporated within the SEA objectives, the SEA objectives that are in place were established through a rigorous process of considering the objectives of associated PPSs and the current environmental baseline within South Ayrshire. It is considered that the goals of the CSGN have been incorporated within SEA objectives where appropriate.
Detailed comments	3.2.2 Biodiversity, flora and fauna	<p>In relation to Biodiversity, Flora and Fauna, by way of clarification we believe the information relating to EC (Habitats) Directive 1992/42/EEC, could be clarified and offer the following comments:</p> <ul style="list-style-type: none"> <li>• The Habitats Directive is transposed into domestic law in Scotland through the Habitats Regulations</li> <li>• The Report states; that the Directive “requires that an appropriate assessment is undertaken for development that directly or indirectly affects an SAC or SPA.” This could more fully reflect the requirements of the legislation. If a plan or project is likely to have a significant effect on the qualifying interests of a Natura site the competent authority must carry out an appropriate assessment.</li> </ul> <p>The proposal can then only be consented if it can be ascertained that it would not adversely affect the integrity of a Natura site (subject to there being no alternative solutions and imperative reasons of overriding public interest).</p> <ul style="list-style-type: none"> <li>• We also suggest that implications for the LDP will include the requirement for the LDP to be subject to Habitats Regulations Appraisal and that the plan can only be adopted if it is ascertained that it would not adversely affect the</li> </ul>	<p>The baseline data of the revised ER will be updated to reflect these comments.</p> <p>The plan has been the subject of a Habitats Regulations Appraisal.</p>	

			integrity of a Natura site (subject to there being no alternative solutions and imperative reasons of overriding public interest).	
		Table 3.1 Biodiversity, Flora and Fauna	<p>The text in the Report leading up to this table suggests that the table outlines issues that need to be taken into account in the LDP production. For completeness it would be worth confirming the four Natura sites noted are the only ones likely to be affected by the plan bearing in mind such sites may be affected at some distance from their boundaries depending on the nature of activities.</p> <p>The Report states that the SACs could be “negatively impacted” and that development could result in “loss of fragmentation” of the SPAs and that an “Appropriate Assessment should be carried out to determine the impact of the LDP on SPA’s and SAC’s”. It may be clearer to suggest that proposals and policies within the LDP could affect the qualifying interest of Natura sites. The LDP should be subject to Habitats Regulations Appraisal and can only be adopted if it can be ascertained that it will not adversely affect the integrity of a Natura site (subject to there being no alternative solutions and imperative reasons of overriding public interest).</p>	<p>The baseline data relates to South Ayrshire exclusively. Any impact upon Natura 2000 sites out with South Ayrshire would be detected and addressed through the HRA.</p> <p>The ER has been amended to reflect these comments.</p>
		Table 3.1 Human Health	<p>One of the baseline issues, backed by a well accepted body of evidence is that human mental and physical health may be affected by the quality of the surrounding environment in terms of access to good quality green space and other informal outdoor areas. If this issue is included then the implications for the LDP can include provision of good quality green space and so the ER can assess the LDP impact on this aspect of Human Health.</p>	<p>It is important to note that this section relates to baseline data. This comment does not offer any baseline data or any sources for the issues being discussed. It appears that there is no such information which relates specifically to South Ayrshire and therefore including this as a statement within the ER without any baseline data would not necessarily be reflective of local circumstances.</p> <p>In any case, one of the associated questions used for assessing impacts upon human health seeks to ensure that development is appropriately sited for access to open space. This has been used throughout the assessment of policies and assessments, ensuring that this is fed into the plan where possible.</p>
		Table 1 Development of SEA objectives	<p>SNH’s comments above at 2.2 in relation to Biodiversity, Flora and Fauna are relevant here also. In addition we note a minor error where the SEA objective should read “ensure the integrity of all” rather than “that all”. The section also refers to sites within or in close proximity to the council area, however as outlined above other sites could be affected by the plan.</p> <p>SNH believes impacts on peat soils are an important element of the Soils, Geology and Land Use topic. We recommend and SEA objective to protect peat soils and where possible enhance these is included in the ER. Loss of and damage to peat soils can have an impact on carbon sequestration and thus is also a Climatic Factor so this objective may also include reference to peat soil protection.</p>	<p>Table 4-1 will be updated to include details of the four Natura 2000 sites. It will also clarify the role of Habitats Regulations Appraisal and Appropriate Assessment. Will also need to consider sites out with South Ayrshire where potential impacts could arise.</p> <p>Typo will be amended.</p> <p>It is recognised that although impacts upon peat resources were a consideration in the initial assessments which took place, that this was not made explicitly clear. Impacts upon peat resources falls within the „soils and geology“ topic and any impacts upon such resources formed part of the considerations within the assessment of policies and potential development sites.</p> <p>It is recognised that there are overlaps with climate</p>

				change and this is something which is evidenced in the policy assessments where relevant.
			In terms of landscape, we believe there is merit in making reference in the SEA objective to the need for the LDP to ensure design and location of development reflects the scale and character of the landscape.	The existing SEA objective in reference to Landscape is a generic objective which seeks to protect and enhance the landscape character of the area. We are satisfied that this covers a range of potential impacts upon the landscape and ensure that the landscape is given adequate protection when utilising the SEA objectives to assess the policies and proposals within the LDP.
		Table 2 SEA objectives and analytical questions	We hope the issues raised above could be reflected in the analytical questions.	The issues are all addressed above. Where it is considered appropriate to include the issues raised within the SEA objectives and associated analytical questions this will be done.
		Appendix A	In Appendix A there is reference to the Habitats Directive. The report states the implications for the LDP are "Requirement to protect these sites from loss or damage by development. Natura 2000 sites require Appropriate Assessment if development is either within, adjacent, or up to 10km from a European site and confirmation from SNH should be sought on this". However, an appropriate assessment is required if a plan or project is likely to have a significant effect on the qualifying interests of a Natura site, there are no fixed distances as suggested here.	The PPS review within the Addendum ER will be updated to reflect these comments.
			It may be useful to have reference to the legislation that transposes the requirements of the Habitats Directive into domestic law or reference to European protected sites.	The revised ER will be updated to ensure the relevant piece of legislation is referenced within the revised ER.
<b>SEPA</b>	General comments		The report is considered to be well structured and easy to follow making good use of tables and diagrams and appears to focus on the issues relevant to the proposed remit of the plan.	Comment noted.
	Detailed comments	3.2 Relationship with other PPS	Section 3.2 explains the effects of planning modernisation on Development Plans. It should be noted however that not all Structure Plans were replaced with Strategic Development Plans. As this is the case for the South Ayrshire Council area you may wish to modify the text to reflect this.	The text in the ER will reflect this comment.
		3.2.1 PPS review	While the diagram on section 3.2.1 is useful, it is noted that the influences are all land use planning documents. It is recommended however that you consider the inclusion of other strategies e.g. River Basin Management Plans.	The purpose of this section is to illustrate the PPSs of most relevance to the forthcoming LDP. Other PPSs which are relevant and which will influence the content of the LDP are outlined within Appendix A of the Scoping Report.
		NPF2	With regard to NPF2 and strategic airport enhancements it is not clear why there is reference to the airports out with the LDP area.	This is simply taken from the wording of the NPF2. There is no suggestion that reference to the other airports will have an impact upon the LDP.
		Scottish Planning Policy	Under the SPP, there is reference to SPPs and NPPGs in Appendix A. You may wish to update this text to reflect the publication of the consolidated SPP.	This will be updated within the ER.
		AJSP	The influence of the AJSP and the existing SALP is clearly described. Given the influence of planning modernisation previously described and that there is no need for a strategic plan for the area, it is not clear why the AJSP is still relevant to this LDP.	Upon commencement of the preparation of a LDP for South Ayrshire, it was agreed that the AJSP will form a key background to the preparation of the LDP, providing a basis for the strategic spatial context to inform the vision statement of the new LDP.
		Figure 3-3 New Planning Structure	The purpose of Figure 3-3 is not entirely clear, possibly as some annotation is missing.	The purpose of Figure 3-3 is to illustrate the new planning structure as it relates to South Ayrshire and this

				is noted in the text above the Figure.
		3.2.2 Environmental Implications of PPS	The organisation of section 3.2.2 appears particularly helpful as it clearly sets the objectives against the influence of the plan.	Comment noted.
		Water	In the section on water, reference is made to achieving good chemical and ecological status. Under the water Framework Directive (WFD) the term „ecological status“ covers quality, quantity, morphology and issues with invasive species. The additional reference to chemical quality may therefore detract from these other issues and it is recommended that your text is amended accordingly. Please note this also applies to other section of the report.	The text will be amended accordingly to reflect this comment.
		Material Assets	For Material Assets it should be noted that the National Waste Plan and Area Waste Plan have been superseded by Scotland’s Zero Waste Plan. This means that text throughout this document will need to be amended accordingly. Scotland’s Zero Waste can be found at <a href="http://www.scotland.gov.uk/Publications/2010/06/08092645/0">http://www.scotland.gov.uk/Publications/2010/06/08092645/0</a> .	The revised ER will be updated to reflect this comment.
		Table 3-1	Again Table 3-1 is thought to be useful and clearly identifies the implications for the LDP.	Comment noted.
			Under the topic of water it is stated that water quality should be protected. Quality has previously been regarded as relating mostly to chemical quality which does not fully encompass the protection required under WFC. It is therefore recommended that this wording is revised and the protection of the physical aspects of the water environment which the LDP can help deliver are emphasised.	This section of the report states that water quality should be protected in line with the WFD. It is considered that this comprehensively covers all aspects of the water environment protected under the WFD.
		3.4 Scoping of Environmental Issues	The reference to SFRA is welcomed.	A SFRA has been made available along with the proposed plan.
		Table 4-1 Development of SEA objectives	The reference to the use of SUDS to help address flood risk is welcomed. We are concerned however with the reference to allowing development provided suitable mitigation is in place. This does not accord with avoidance, one of the key principles of sustainable flood risk management. It is therefore recommended that this wording is amended to reflect this approach.	Amended.
		Table 4-2 SEA objectives and analytical questions	This table is considered to be very useful and the recognition of the physical and mental impacts of flood risk under Human Health is welcomed.	Comment noted
		6.2 Addendum ER consultation	It is noted that a 6 week consultation period for the Addendum ER is proposed starting between December 2010 and January 2011. If the consultation is started in December 2010, this consultation deadline may be difficult to adhere to given the number of statutory holidays and associated annual leave at this time. A further 2 weeks would therefore be requested. If the consultation period started in January 2011 this is unlikely to be necessary.	The consultation dates have been amended.
		General comment	Following the direction of the SEA toolkit it is recommended that a summary of the likely changes to the environment if the Plan is not implemented is produced.	This will be included within the revised ER.
<b>Historic Scotland</b>	Detailed comment	Scope of assessment and level of detail	Overall, I found the scoping report clear and Helpful and I am content with the scope and level of detail proposed for the environmental assessment.	Comment noted
		Consultation period	I am also content with the 6 week period proposed for consultation on the plan	Comment noted

		for the ER	and the ER. For administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.	
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## Consultation comments on pLDP Environmental Report

Consultation body	Ref.	ER reference	Consultation body comment	Response	Action for LDP
SEPA	General comments		The ER is comprehensive and well set out and SEPA is satisfied that an adequate level of assessment of the plan has been carried out. We are also satisfied that the report takes into account the issues raised by SEPA in its response of 12 <sup>th</sup> June 2010 to the Environmental Report of the local development plan main issues report and our Local Development Plan, scoping consultation response of 28 <sup>th</sup> September 2010.	Noted	None
	Detailed comments	Appendix A	The Water Environment (Controlled Activities) (Scotland) Regulations 2005 should be updated to the Water Environment (Controlled Activities) (Scotland) Regulations 2011.	Amended as suggested.	None
	Detailed comments	Table 4.1 SEA Objectives (Material Assets)	Table 4.1 clearly sets out the key policy and baseline implications of the SEA topics. We welcome the reference to the waste hierarchy under material assets, however, it should be noted that the waste hierarchy's preference is for prevention in the first instance, then reduction.	Amended as suggested	None
	Detailed comments	Table 8.5: Mitigation and Recommendations	Table 8.5 clearly sets out mitigation recommendations and how these have been taken into account. We welcome the reassessment of policy with mitigation.	Noted	None
Historic Scotland	General comments		Overall, the ER provides a clear and thorough assessment of the significant environmental effects of the Proposed Plan on the historic environment and we appreciate the effort that has gone into this exercise. We also welcome the clarification provided on how the land assessment framework relates to the environmental assessment. As such, we only have some minor comments to make which are included below.	Noted	None
	General comments		Given that the production of supplementary guidance for the historic environment is given high priority in the Action Plan and a risk has been identified for effective policy implementation should it not be prepared prior to Examination, it is surprising that this has not been highlighted in the ER.	It is considered that the weighting attributed to the Historic Environment policy remains relevant as the issue relating to supplementary guidance is a matter of timing. The policy was assessed on that basis.	None
	Detailed comments	Monitoring strategy	I note that the monitoring indicator in relation to cultural heritage in Table 11-1 is the number of new developments requiring listed building consent. I would suggest that rather than just measuring baseline trends, a more effective approach might be for the indicators to focus on measuring impacts from the plan on the environment. One way of achieving this may be to monitor the performance of supplementary guidance as a planning tool. It may also be helpful to monitor the success or otherwise in masterplans prepared for specific allocations in successfully avoiding harm/enhancing opportunities at the project level.	There is no straightforward way to carry out the suggested monitoring. We are mindful of the resource implications of the monitoring strategy. Any monitoring which is of a subjective nature is likely to be more demanding on resources and may also be of little value.	None
	Detailed comments	Table 8-5: Mitigation and Recommendations	While Appendix E assesses the policies for the historic environment and estates, these do not appear to have included in Table 8-5 – only archaeology is included in this section as a policy option.	No mitigation measures are suggested for the Historic Environment or Estates policies and therefore neither of these policies will be included within the mitigation table.	None
	Detailed comments	Table 8-5: Mitigation and Recommendations	As the Belleisle/Rozelle Masterplan Area includes the Category A-listed Rozelle House (HB Num 21763) and its associated inventory designed landscape as well as some category B and C listed buildings, mitigation for potential impacts on the historic environment could have been highlighted in Table 8-5 alongside flooding and natural heritage considerations.	The policy specifically seeks to ensure the preservation, maintenance and management of historical assets within both of the estates. It was therefore considered that no mitigation was necessary in respect of specific features as the policy presents a strategic approach to ensuring that all valued historical assets within both of the estates are appropriately protected.	None
	Detailed comments	Appendix E	In addition, while I welcome the awareness of the need to protect the category A-listed Ayrshire management Centre (HB Num 21556) within the Craigie Estate in Appendix E, it should be noted that the B-listed Dam park station is also located within the Estate.	The assessment within Appendix E shows that full recognition and consideration was given towards cultural heritage features within the Estate. A mitigation measure relating to features of the historic environment was suggested, however, it was rejected on the basis that the necessary mitigation was already offered by the Historic Environment policy, as is evidenced in Table 8-5.	None
	Detailed comments	Appendix E	Finally, while Appendix E considers the reuse of listed buildings within the estates, many of these are also inventory historic gardens and designed landscapes.	Noted. No action suggested.	None
SNH	Detailed comments	Appendix E	European Protected Species; The policy in the LDP policy: Natural Heritage includes reference to priority species as identified in the Habitats Directive (92/43/EC). The policy relates to the protection of these habitats and species but, only insofar as they are present within a designated site. The outcome of the assessment of this policy in Appendix E for biodiversity is assessed as being 'minor positive'. SNH agrees with this assessment. However, as this is the key policy for the protection and enhancement of the natural heritage it is disappointing that the pLDP, as it stands, will only have a minor positive effect. Our representations on the pLDP offer suggestions to improve the effect of this policy.	The wording of the policy has been altered in order to reflect the suggested wording provided by SNH. However, it is considered that this will not alter the weighting attributed to the policy as there is still scope within the policy for potentially adverse effects upon natural heritage interests. It is considered that this is unavoidable as there will always have to be a degree of flexibility within all policies in order for them to operate effectively.	Yes. The policy has to be re-written in accordance with the views of SNH.
	Detailed comments	Natura 2000	Natura; our current comments on appropriate assessment and the Habitats Regulations Assessment process for this pLDP are contained in a separate response.	Noted	None
	Detailed comments	Appendix E	Biosphere Reserve; we welcome the policy on this and agree with the ER assessment of impacts.	Noted	None

	Detailed comments	Appendix E	Landscape; we welcome the protection the pLDP assigns in the policy on landscape, in particular the reference to settings of towns, scenic areas etc. However, we are not clear on the extent to which the landscape SEA topic is met because of the terms used in this policy such as 'landscape character areas'. In our pLDP response we will give details of our uncertainty and seek clarification.	The reference to 'landscape character areas' within the "protecting the landscape" policy is incorrect. This reference will be removed and the policy will offer guidance relating to the scenic area. The policy will also be altered to include reference to the ALCA and promoting its role in the consideration of development proposals.  The weightings attributed to the policy are considered to remain relevant.	Yes. Alteration to LDP Policy: protecting the landscape
	General comments		We find this ER is comprehensive, transparent and well presented.	Noted	None
	Detailed comments	Table 2-2: Objective instances where the SEA has influenced the PSALDP  Ayr and Troon Ports	SNH welcomes the alteration to this policy to take account of biodiversity. Since the production of MIR, the principles of CSGN are becoming clearer. As well as promoting biodiversity, CSGN has a role in promoting access which can assist in improvements to the SEA topic, public health. These ports have a national cycle route running through them. In addition to meeting SEA objectives on biodiversity, public health could be addressed if the policy acknowledges the cycle route and has commitment to protect and where possible, enhance it. Alternatively, SNH has advised strengthening the policy on CSGN as follows:  "To contribute to the vision and goals of the network, we will <del>try to</del> use development opportunities, including through master planning, to make sure that pathways, cycle routes..."	Comments are raised under the wrong section. This is more relevant to the weighting attributed to the Ports Policy under Appendix E. The policy assessment has been amended and includes a mitigation measure recognising cycle routes within Ayr Port and states that the Council supports the protection of these routes and their enhancement, where possible. The national cycle route does not run through the port area at Troon, as identified on the Proposals Map. A response will be required from the perspective of the Plan determining whether the suggested mitigation measure is accepted or rejected.	The LDP will need to determine if the suggested mitigation measure is to be included in an amended version of the Ports Policy.
	Detailed comments	Table 2-2: Objective instances where the SEA has influenced the PSALDP  Landscape Quality	The policy was amended to ensure that impacts upon the scenic area were given some recognition within the policy. There is no reference to 'scenic area' within the Landscape Quality policy. There is reference to scenic areas in the next policy, LDP Policy: Protecting the landscape. It is assumed that this is an error and scenic reference relates only to LDP Policy: Protecting the landscape. Clarification on this would be appreciated.	This has been amended. The response to the mitigation measure has been changed so that the intended purpose of the policy is not to deal with specific landscape designations, this is the purpose of the "protecting the landscape policy". As such, the suggested mitigation measure is rejected for this policy, however, this will be addressed within the "protecting the landscape policy".	None
	Detailed comments	Appendix E – LDP Policy: Open Space (Human Health)	We believe the policy could be strengthened.  The assessment in Appendix E of the policy on this topic is one of 'moderate benefit'. The current policy may not achieve the 'moderate benefit' as described in Appendix E without clearer commitment to following the standards that emerge from the OSS.	The policy makes no reference to the open space strategy; it refers to supplementary guidance from which open space standards are derived. There are no standards for the provision of open space within residential developments within the forthcoming OSS. It is therefore considered that the weighting attributed to this policy remains relevant.	None
	Detailed comments	Table 2-3, SEA topic: Landscape	We welcome the reference here to Ayrshire Landscape Assessment which we raised in our earlier response. The implications as described here seem appropriate for the LDP policy; however we believe that due to the terms used, the environmental effect will not be as predicted. Our detailed comments about this policy are in our response to the LDP consultation.	The comment here relates to the issue raised and addressed above.	As above
	Detailed comments	3.2.4 Soils and Geology	In the section on Biodiversity this chapter includes the numbers of biological and mixed SSSI. For completeness of information there are several SSSIs that are notified purely for their geological interest and these are; Afton Lodge, Blair Farm, Byne Hill, Craighead Quarry, Girvan to Ballantrae Cost Section, Knockgardner, Knockmoral, Millenderdale, Penwhapple Burn, Roughneuk Quarry, Sgavoch, South Threave, Stairhill and Turnberry Lighthouse to Port Murray. It may be necessary to make some mention of these should they raise environmental issues.	This is a summary section. All SSSIs were considered in terms of 'environmental issues'. Details of all SSSIs can be found within the Baseline Report (C2.3.1).	None
	Detailed comments	3.2.5 Landscape	We are disappointed that the Ayrshire Landscape Character Assessment (ALCA) is not listed as a key part of baseline information as the main subject of this document is an identification of Ayrshire's various landscape character types and is regarded as the baseline for use in EIAs etc. The subsequent mapping in fig 3.3 does however show Ayrshire 'landscape character areas'. These have what appear to be the same boundaries as presented in ALCA, but the titles of the various character areas is not in accordance with the titles in the ALCA. As there is a formal methodology used in identifying these Landscape Character Areas (LCA) which is explained in the ALCA, it would be reassuring to know the landscape character areas in the ER are defined in the same way. So the sensitivities of the LCA called 'Uplands Glens Valleys and Dales' in fig 3.3 in the ER are the same as the LCA named 'Intimate Pastoral Valley' in the ALCA and has the same forces for change and development pressures acting on it and general management guidelines would be appropriate for both. We will be pleased to clarify our concerns here should you find this useful.	This section provides a brief summary of the landscape within South Ayrshire and is not intended to cover studies relating to the landscape. The ALCA is given clear consideration within the Baseline Report under section C6.3 showing that it has formed a clear role in the preparation of the LDP.  Amend Fig 3.3 to ensure the correct labels are applied.	None
	Detailed comments	3.2.9 Human Health	This section notes that: "...South Ayrshire has an extensive path and cycle network including National Cycle Network (NCN) 7 and numerous local routes..."  We also recommend that for completeness, the long distance route which is now being recognised by SNH as one of 'Scotland's Great Trails', the Ayrshire Coastal Path, is also included in this list. Inclusion of this recreational facility in the LDP will enhance the benefit to Human Health which we	This is a summary section and the purpose of this section is not to include details of all major attributes within South Ayrshire. In addition, the Ayrshire Coastal Path is recognised within the Baseline Report at C10.4.1. Nonetheless, the summary has been updated to include reference to the route.	None.

			agree is an outcome from the provision of good quality access opportunities.	The pLDP contains an Environment and Access map which denotes the Ayrshire Coastal Path.	
Detailed comments	3.3 Interaction between Environmental Media		This interesting section highlights the way various elements of the environment affect and are affected by each other and using a strict 'topic' based approach should be tempered with this understanding. We believe a further interaction is should be highlighted here and this is the impact on climate change from loss of and damage to carbon soils, particularly peat. Peat not only takes carbon from the atmosphere and stores it over time and the loss of peat or damage to it means loss of this important facility for active storage, but it also results in release of more carbon from the damaged peat. So protection of soils is closely linked to addressing climate change.	A paragraph has been inserted detailing the links between carbon soils and climate change.	None
Detailed comments	Table 4-1: SEA objectives		Landscape; the SEA objective is described as: "...Protect and enhance & the area's landscape character and designated Scenic Areas. Maintain and protect greenbelt areas in South Ayrshire..."  See above our comments on para 3.2.5 on the need for clarity in the landscape character titles used in the ER and pLDP. Both should make clear reference to the Ayrshire Landscape Character Assessment of 1998 produced by Land Use Consultants for SNH in partnership with the local authorities, including South Ayrshire Council. As noted above, for clarity it would be helpful if the names of the LCA on figure 3-3 were titled in line with this document.	The maps will be updated to ensure that the titles reflect those used within the ALCA.	None.
Detailed comments	Table 4-1: SEA objectives		Human Health; the SEA objectives and the implications for the policies will be more usefully addressed through ensuring the targets and aims of CSGN are included, particularly where new development provides opportunity for master planning which can address these aims.	It is unclear what is being suggested here. The purpose of Table 4-1 is to identify the main issues relating to each of the SEA topics which have been identified through consideration of relevant PPS and baseline data. It would be unfair and inaccurate to base the SEA objectives relating to Human Health solely on the targets and aims of the CSGN.	None.
Detailed comments	Assessment Methodology		This is clear and well presented and we agree the methods. The chapter explains part of the basis for the matrix presented in Appendix E. However, we note that the text for the policies against which the assessments are made in Appendix E is not as presented in the published pLDP. In particular, we comment on the following policies where the current wording in the pLDP may result in the assessment in this matrix not being accurate due to the different wording of the actual published pLDP policies. Below we point out some areas of concern about the assessment in Appendix E.  i) Open Space Policy: the wording in the published pLDP is less likely to achieve the benefits for human health as the published policy wording does not have the clarity about levels of protection proposed. Our response to the pLDP suggests modification that we believe will lead to the outcomes for human health identified in Appendix E.  ii) Landscape Protection Policy; the policy as presented here refers to 'Landscape Character Areas (as defined on the LDP Map)'. The published pLDP has no mapped Landscape Character Areas as presented in the Landscape Character Assessment from 1998 Land Use Consultants' report. It has mapped 'Scenic Areas', but not 'Landscape Character Areas'. The pLDP policy does not clearly identify this Landscape Assessment as the basis for informing decisions on the impact of development and in our response to the pLDP consultation we provide suggested additional caveat for this policy to ensure the policy results in benefits to the landscape as concluded in the ER Appendix E.  iii) Green Networks Policy; the text in the policy in this Appendix states; 'the Council will seek to use development opportunities to ensure that pathways...' This is not as found in the published pLDP policy which states; '...we will try to use development...as far as possible'. The current pLDP policy test gives far less certainty of the outcome of the policy and thus of the ability of this policy to achieve moderate benefit for biodiversity and benefit for human health as assessed in Appendix E. Our response to the pLDP gives more detail about our concerns with this policy.	Many of the policies within the Plan have gone through several iterations before reaching the format as set out within the pLDP. Going through several iterations has resulted in policies appearing within the pLDP which were not those as laid out in the ER. However, in all instances consideration was given as to whether any of the modified policies would result in alterations to the weightings and suggested mitigation measures set out within Appendix E. The outcomes of this process are set out as an addendum to this table.  Where SNH are of the view that the weighting is inaccurate, the assessment will be re-done and amended as appropriate.  i) The policy will be amended as suggested and therefore, the weighting attributed to the policy remains relevant.  ii) This is an inaccuracy. The landscape character area is the scenic area and there has been an error in progressing this policy from the SALP to the LDP. The policy has been amended to include reference to the ALCA and the weighting attributed to this policy remains relevant.  iii) The policy has been amended as suggested. The weighting attributed to the policy therefore remains relevant.	The "protecting the landscape" and "CSGN" policies require to be amended as suggested.
Detailed Comments	Land Assessment Framework		We appreciate this transparent assessment of sites and identification of limitations relating to the themes used in the assessment.	Noted	None
Detailed Comments	Environmental Assessment		This is clear and well presented and includes a description of other assessments including Habitats Regulations Appraisal (HRA). SNH has commented separately on the HRA, but for completeness we record here that we are content with the conclusions of the HRA provided inconsistencies between in policy wording can be resolved.	Noted	This has been addressed through the HRA.
Detailed Comments	Environmental Assessment		We note the Preferred Vision Option presented at the start of this chapter. We accept the justification for this and welcome the Preferred Vision. Section '8.8 Environmental Assessment – Policy Options' summarises the outcomes of the assessments. Our comments in relation to Chapter 5 above and the references there to Appendix E include our views on the outcome of the assessment. We point out above in our comments on Chapter 5 that policies in Appendix E are different to that which appears in the published pLDP. As a result some policies will not achieve the assessment outcomes attributed to them. We highlight particular problems with policies on Open Space, Landscape and Green Networks (Central Scotland Green Network).	Many of the policies within the Plan have gone through several iterations before reaching the format as set out within the pLDP. Going through several iterations has resulted in policies appearing within the pLDP which were not those as laid out in the ER. However, in all instances consideration was given as to whether any of the modified policies would result in alterations to the weightings and suggested mitigation	None

			It appears the summary presented here is also based on the text of policies in Appendix E and so the same problems with the assessment outcomes are present.	measures set out within Appendix E. The outcomes of this process are set out as an addendum to this table.  One of the main reasons for altering policies was as a result of the Crystal Marking process. This resulted in some of the wording within the policies being simplified, however, the overall thrust of the policies remain the same.	
	Detailed Comments	Residual and Cumulative Effects Assessment	Comments here mirror our concerns about the disparity between the wording of the published pLDP and the text of the policies in the ER.	Many of the policies within the Plan have gone through several iterations before reaching the format as set out within the pLDP. Going through several iterations has resulted in policies appearing within the pLDP which were not those as laid out in the ER. However, in all instances consideration was given as to whether any of the modified policies would result in alterations to the weightings and suggested mitigation measures set out within Appendix E. The findings of this are set out as an addendum to this table.  One of the main reasons for altering policies was as a result of the Crystal Marking process. This resulted in some of the wording within the policies being simplified; however, the overall thrust of the policies remains the same.  Where any of the weightings attributed to the most up-to-date have been altered, this has been fed through to the cumulative and residual effects assessment.	None
	Detailed Comments	Conclusion	The conclusion includes identification of how the SEA process has lead to the inclusion of the protection of peat in the policy on sustainable development. However, this reference to peat does not appear in the text of the Sustainable Development policy in the ER and its Appendices, but it is present in the published pLDP. However, in principle we agree the conclusions reached in this section.	The reason for this is that the inclusion of peat in relation to the Sustainable Development Policy was only something which was identified through the assessment process. This shows that the assessment process had resulted in the application of a mitigation measure, as is evidenced by the Sustainable Development policy set out within the pLDP.	None
	Detailed Comments	Monitoring Strategy	We note the strategy in Table 11-1 includes reference to 'quality' of national and international sites such as SSSIs and Natura sites. SNH will be pleased to contribute to this monitoring. Our input will relate specifically to the SSSI feature 'condition' as this is part of our ongoing Site Condition Monitoring programme and we hope this will provide useful information for the SEA process.	Noted	None