

South Ayrshire Council

South Ayrshire Local Development Plan 2 (adopted 31st August 2022)

Statement of Particulars under Section 18 of the Environmental Assessment (Scotland) Act 2005 (‘SEA post adoption statement’)

February 2023

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1. Key facts

Table 1.1 sets out key facts relating to South Ayrshire Local Development Plan 2 (LDP2) and its associated strategic environmental assessment.

Table 1.1: Key facts

Key Facts	Detail
Responsible Authority	South Ayrshire Council
Title of Plan / Programme	South Ayrshire Local Development Plan 2
What prompted the plan	Statutory review mandated by the Town and Country Planning (Scotland) Act 1997 (as amended by the Planning etc. (Scotland) Act 2006)
Plan subject	Town and country planning
Time period covered by plan	2022 – 2027 (statutory review of this document will proceed in due course under the auspices of the succeeding legislative framework introduced by the Planning (Scotland) Act 2019)
Frequency of review	5-yearly
Plan area	South Ayrshire
Plan purpose and / or Objectives	LDP2 sought engagement with businesses and communities which highlighted various issues the planning authority needed to address via the development plan. LDP2 needed to consider the needs of - and the provision of services for – a changing population, and aims to address these issues. LDP2 aims to provide a more supportive, flexible and forward looking approach to sustainable development, re-affirm commitment to major growth areas, help communities achieve their aspirations, support resurgent town centres, provide a vision for new leisure and employment opportunities, and contain a fresh approach to rural diversification.
Date of plan adoption	31 st August 2022
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2. Strategic environmental assessment process

- 2.1 South Ayrshire Local Development Plan 2 (LDP2) underwent a process of strategic environmental assessment (SEA) as prescribed by the Environmental Assessment (Scotland) Act 2005. This included the following activities:
- Taking into account the views of the statutory consultation authorities (Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report;
 - Preparing an environmental report on the likely significant effects on the environment of the LDP2 which includes consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the plan and other relevant strategies, policies, plans, programmes (PPS) and environmental protection objectives;
 - existing environmental problems affecting the plan;
 - the plan's likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen; and
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken;
 - Consulting the public and the consultation authorities on the environmental report;
 - Taking into account the environmental report and the results of consultation in making final decisions regarding the content of LDP2; and
 - Committing to monitoring the significant environmental effects of the implementation of LDP2. This will also identify any unforeseen significant environmental effects and enable appropriate remedial action to be taken.
- 2.2 The purpose of this statement is to set out how environmental considerations have been integrated into the plan and how the findings in the environmental report and associated consultation responses were taken into account during the preparation of the plan. It explains the extent to which LDP2 content and iteration was influenced by the SEA and provide a summary of the reasons for choosing the plan as adopted in light of other reasonable alternatives considered. Finally, it sets out arrangements for monitoring any significant environmental effects of implementing the plan.
- 2.3 This statement ('SEA post-adoption statement') has been prepared in accordance with section 18 of the Environmental Assessment (Scotland) Act 2005.

3. How environmental considerations have been integrated into the plan

3.1 LDP2 contains numerous principles and policies seeking to ensure the protection and enhancement of environmental assets, providing for a balanced approach in managing development proposals. Although the inclusion of these policies is not as a direct result of the SEA process, it is considered the existence and prominence of SEA process and other environmental legislation bears continuous influence upon policy-makers from the outset of the plan-making process. This leads to a more environmentally-aware blueprint for a development plan before statutory environmental assessment of policies and site commences. Table 3-1 sets out how the SEA objectives associated with each of the environmental topics have been integrated into the content of the plan.

Table 3-1: integrating environmental considerations into LDP2

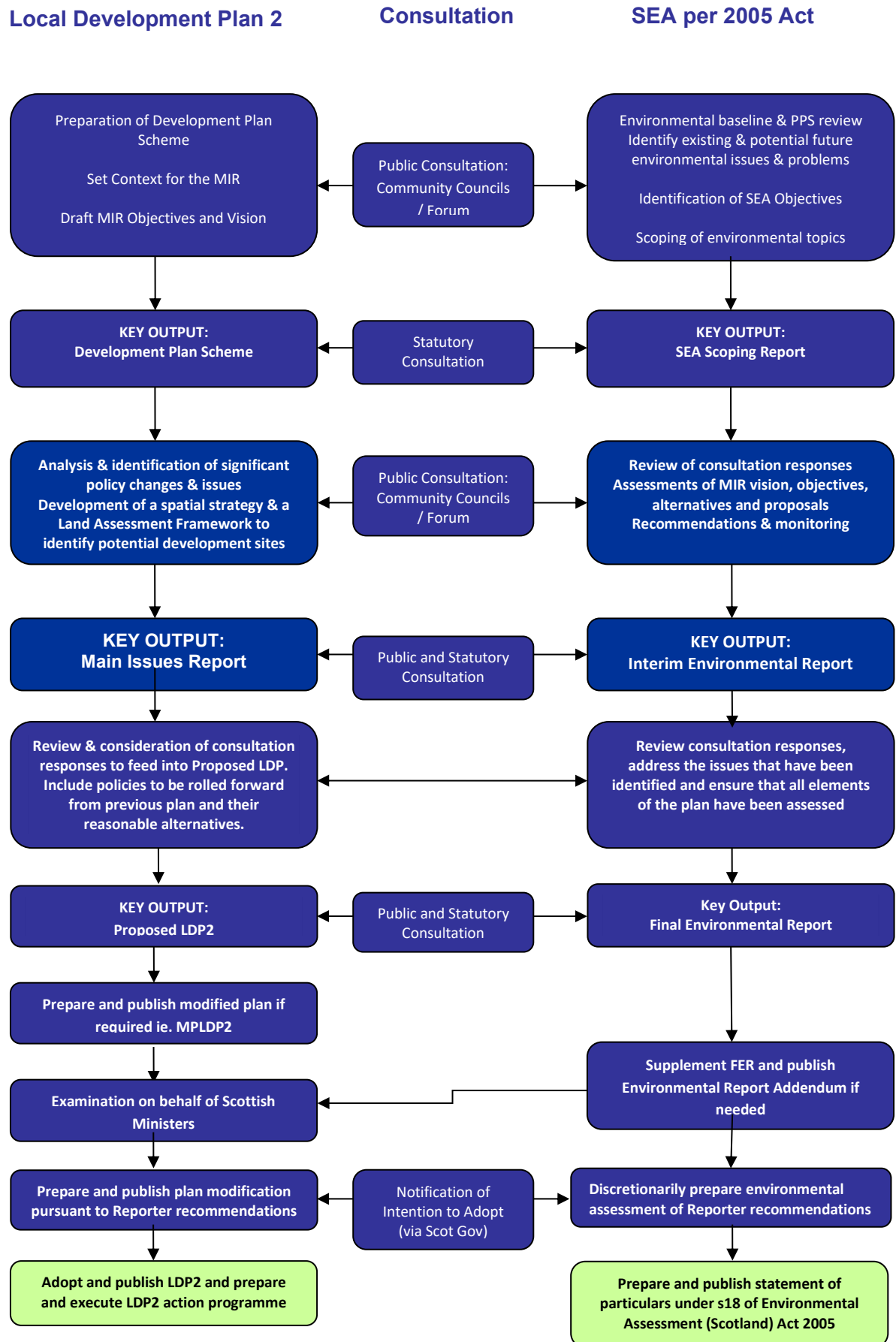
SEA topic	Environmental considerations as expressed via 'SEA objectives'	How environmental considerations have been integrated into LDP2
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Avoid adverse effects on protected habitats and species Where possible, enhance biodiversity Avoid adverse effects, so far as possible, on all habitats and species 	LDP2 bears provisions protecting existing biodiversity from encroachment and fragmentation and promoting opportunities for networking of habitats through wildlife corridors.
Cultural heritage	<ul style="list-style-type: none"> Safeguard and, where appropriate, enhance cultural heritage features and their settings 	LDP2 bears provisions ensuring that future development proposals are sensitively sited with regard to cultural heritage features.
Water	<ul style="list-style-type: none"> Protect and enhance the state of the water environment Protect, and where necessary, enhance water quality to "good" ecological and chemical status in line with the Water Framework Directive (2000/60/EC) (WFD). Reduce the risk of flooding 	<p>LDP2 bears provisions directing that development should avoid areas which are likely to be affected by flooding or would increase the likelihood of flooding elsewhere, unless adequate flood mitigation measures are employed.</p> <p>LDP2 expressly supports the objectives of the WFD and requires that development meets same. Plural policy protections require development to demonstrate that the water environment will be protected or where possible improved; with further safeguards on averting risk to quality of controlled waters and harm to biodiversity.</p>
Soils, geology and land use	<ul style="list-style-type: none"> The LDP should promote the use of brownfield land when directing proposals to appropriate locations. Maintain or improve soil quality and prevent any further degradation of soils 	<p>LDP2 bears provisions promoting the development of brownfield sites and in so doing encourages the rehabilitation of contaminated land.</p> <p>LDP2 bears provisions directing that development should protect carbon-rich soils and improve soil quality</p>
Landscape	<ul style="list-style-type: none"> Avoid adverse impacts on protected landscape, wild land and geodiversity Avoid adverse effects on all landscapes Where possible, enhance landscape quality 	<p>LDP2 affords protections to South Ayrshire's varying landscape assets and promotes enhancements to same where possible – principally via safeguarding policy provisions which recognise and respond to the particular qualities and sensitivities of each landscape character type.</p> <p>LDP2 brings landscape character framework up to date with best practice, by manifesting the findings of an authority-wide local landscape review via designation of a suite of Local Landscape Areas (LLAs) – per NatureScot guidance.</p>
Air quality	<ul style="list-style-type: none"> Prevent deterioration in air quality 	<p>LDP2 bears a proactive policy context which encourages active travel and the use of public transport to reduce reliance upon private car usage.</p> <p>Elsewhere LDP2 bears provisions assuring the spatial appropriateness of new industrial development.</p>
Climatic factors	<ul style="list-style-type: none"> Contribute to reduction of GHG emissions in line with Scottish Government targets Comprise or contribute to avoidance, mitigation of / increased resilience to climate change-borne flooding 	LDP2 bears a proactive policy context which encourages active travel and use of public transport to reduce congestion and private car usage. Elsewhere LDP2 also bears provisions encouraging the installation and operation of low and zero carbon generating technologies.

		Consequently implementation of LDP2 shall appropriately contribute to national GHG reductions targets.
Noise	<ul style="list-style-type: none"> The LDP should ensure that noise levels do not exceed acceptable standards. Noise generating development should be directed to appropriate locations avoiding noise sensitive receptors Noise sensitive developments should be directed to appropriate locations, avoiding areas which experience excessive levels of noise. 	LDP2 bears provisions supervising appropriate siting both of noise-sensitive and noise-generating developments alike; ensuring development is not adversely affected by unacceptable levels of noise pollution, nor that it causes unacceptable levels of noise to sensitive receptors. Relatedly LDP2 bears various safeguards likewise protecting the established amenity of existing land uses in respect of noise.
Human health	<ul style="list-style-type: none"> To enhance and protect human health and promote healthy living through improved active travel opportunities, particularly the quality of and availability to, walk and cycle. Maintain and improve recreational facilities and promote access to health, social and recreational facilities. Enhancement of green/blue networks to improve their health and wellbeing benefits 	<p>LDP2 bears provisions directing recreational developments to accessible locations and encouraging active travel through accommodating walking and cycling, such as enable and support delivery of external targets for minimum recommended levels of activity.</p> <p>LDP2 bears spatial and infrastructural considerations aiming to provide and encourage sustainable means of travel to a range of community facilities, including through the adoption of a Town Centre First principle.</p> <p>LDP2 bears provisions expecting that urban greenspaces render multiple functions which include key beneficial effects to human health and wellbeing, and sets platform for CSGN.</p>
Population	<ul style="list-style-type: none"> Maintain or enhance sustainable access to key services, amenities and employment. Promote economic growth to encourage retention of the working age population. 	<p>LDP2 bears provisions enabling sustainable economic growth eg. encouraging appropriately-located proposals which represent employment, business, leisure and tourism opportunities.</p> <p>LDP2 spatially directs development proposals, ensuring their suitable positioning in relation to ease of access to public transport, walking and cycling routes.</p>
Material assets	<ul style="list-style-type: none"> The existing infrastructure network should be appropriately maintained and enhanced, where possible. Material assets should be safeguarded and utilised sustainably and efficiently. 	<p>LDP2 bears provision promoting and prioritising active travel, sustainable transport modes and inclusive access.</p> <p>LDP2 bears provisions recognising the need to make efficient use of existing material assets, and securing contributions for requisite interventions to offset impacts of new development on established infrastructure networks</p>

4. How the environmental report has been taken into account

- 4.1 In terms of direct and reactive action, the environmental report has had a proportionately confined influence over the content of LDP2 for a number of reasons. Much of LDP2's substantive change relative to SALDP (as precipitated and directed thematically by the intervening Main Issues Report) represents minor evolution of, rather than a radical departure from, the established SALDP position which was the respective subject of a full SEA appraising the overall appropriateness of its own environmental effects; and to which alternatives and mitigation measures have already been considered and applied, where possible.
- 4.2 The strategic direction and overarching principles applied within LDP2 are further constrained, to a large extent, by mandatory compliance with higher-level plans contemporary to its preparation, most particularly Scottish Planning Policy (SPP) (NB. itself latterly superseded by NPF4). This fundamentally limited the scope for considering or justifying comparatively radical approaches for the policies set out within LDP2, including from the particular perspective of accounting for environmental effects.
- 4.3 However, that the account taken of the environmental report did not obviously result in clear instances of editorial overriding of the plan content does not mean that it has not borne important value in the plan-making process in less immediately obvious or retroactively interventionist ways. Various, the operation of environmental assessment in parallel to plan preparation (as illustrated overleaf and via the informal internal professional dialogue and peer review that facilitates same) provides a continuous 'checks and balances' function throughout the iterative stages of developing the plan: by raising and maintaining the planmaker's awareness of SEA objectives, thereby ensuring they are consciously embedded in the overall framing of plan strategy and policy provisions, and ultimately averting a situation whereby the plan's emerging direction veers materially from those objectives to a degree which warrants major corrective action via SEA-led mitigation / policy option jettison. In this regard, on reflection it is considered a strength that the mainstreaming of environment assessment during LDP2's preparation has been observed to appropriately prevent any such episodes of significant misalignment as aforesaid.
- 4.4 A recurring focus for the mitigation measures initially advanced by the environmental assessment was in reducing uncertainty of the plan content's effects by way of additional specifics. However it is necessary to note that the content of a single policy at hand cannot by its nature typically provide the levels of detail sought by the mitigation, as this would entail a repetitious and unworkable importation of the protective provisions of other policies catering to other matters; and so undermining, and failing to recognise, the requirement for the plan to be read as a whole and applied as a coherent single entity, whereby the cross-application of diverse policies introduces balance to the assessment and thus appropriate mitigation upon the incidence of adverse effects on a topic area.
- 4.5 Relatedly the plan-maker responses to the suggested mitigation measures reflect an awareness of the particular functionality and operating nature of the plan, most specifically its required application as a whole. As such, where mitigation has been suggested in a given instance it does not automatically mean that the content as proposed necessarily requires a greater or lesser degree of amendment, but that such mitigation may variously be secured by a combination of site-level, proposal specific mitigation measures secured through development management; greater detail more appropriately found within forthcoming supplementary guidance; and existing cross-referencing mitigation provided by relevant existing LDP policies, as carried forward. It is ultimately a combination of all the foregoing which will ensure that a balanced approach is taken in the decision-making process.
- 4.6 Figure 4-1 overleaf identifies the phases and integration of plan-making and SEA processes in parallel. The boxes coloured green signify the current, final stages of the respective plan-making and environmental assessment processes.

Figure 4-1



5. How opinions expressed in response to invitations have been taken into account

- 5.1 As part of the LDP2 and environmental report's parallel processes, various stages of consultation have taken place ensuring the Council has met its statutory requirements as responsible authority. Consultation under the 2005 Act has taken place as part of the preparation of an initial scoping report, for the interim environmental report which accompanied the MIR, and for the environmental report which accompanied the proposed plan. At each of these stages, consultation comments have been received which have been used to refine and inform the content of the environmental report. Appendix A to this statement contains tables setting out the consultation comments received during respective stages, with a final column corresponding to how the Council took account of opinions expressed.
- 5.2 The consultation process demonstrably added value to the SEA's various stages and therefore LDP2 itself, such as it is underpinned by its respective environmental assessment. The Council has sought to take account of opinions expressed by statutory and non-statutory consultees by way of reflection, action and/or clarification as and where deemed necessary. The value of the dialogue provided for via statutory consultation has been realised via multiple means; including through additions and crosschecks to environmental baseline constituents, methodological refinements, second opinion on certain examples of subjective policy assessment, and expert guidance from consultation authorities. Collectively, these inputs have contributed to making the SEA processes and outputs more robust – and moreover, help to provide learning outcomes which can be taken forward and/or further developed to provide improvements in respect of environmental assessment of succeeding plan/s in due course. Appendix A refers.
- 5.3 To illustrate the latter, we outline below two helpful and constructive examples which arose via consultation authority statutory feedback. HES raised concern that historic environment policy in PLDP2 neither provided overt protection for undesignated assets nor a presumption in favour of retaining listed buildings. This feedback triggered reappraisal of how the policy content may be strengthened to bear more favourable environmental effect in line with HES' suggestions, and the policy was duly reworked for MPLDP2 – representing a positive enhancement precipitated via consultation opinion on the environmental report. Elsewhere, SNH were able to highlight outdated assumptions regarding their interfacing with DM casework via consultation, which had been factored into the preliminary proposals for plan monitoring. Through SNH's opinions on the environmental report, SAC were able to update the monitoring strategy presented via this statement in order that it more appropriately referenced SNH standing advice as a benchmark against which the cumulative effects of development enabled via DM may be monitored.

6. Consultation under regulation 14 of the Environmental Assessment of Plans and Programmes Regulations 2004

- 6.1 The regulation cited above provides mechanisms for international notification and consultation procedures to be undertaken with neighbouring sovereign European states, in respect of where significant transboundary effects are identified as arising from a proposed plan. No consultations of this nature were found necessary or therefore undertaken at any stage in the preparation of LDP2.

7. Reasons for choosing LDP2 as adopted in light of reasonable alternatives considered

- 7.1 In accordance with the nature and purposed of the main issues report (as per regulation), numerous wide-ranging alternatives were identified for consideration at that particular stage. Any alternatives require by regulation to be reasonable in that they must seek to achieve the overall objectives of the LDP2 and comply with higher-level PPSs. Considering these alternatives provides an opportunity to assess different methods of achieving the same goals. Likewise during environmental assessment of LDP2 it was mandatory to consider the environmental effects of any such reasonable alternatives to its content.
- 7.2 Reasonable alternatives were considered in respect of each of the component parts of LDP2, including the vision, spatial policies and general policy statements. Correspondingly the environmental report sets out details of the alternatives considered in the course of deriving the policies set out and taken forward through LDP2 as ultimately adopted.

- 7.3 At MIR stage, a number of policy options were explored in accordance with the requirements of SEA and planning legislation. This resulted in refining the preferred options and arriving at the policies which are presented within the proposed plan. For completeness, the environmental report contains details of the alternatives and how they were assessed within the main issues report and proposed plan. Throughout the process, the policies and alternatives were assessed against the SEA objectives and associated questions using the matrix set out in the ER.
- 7.4 In some instances the assessment process showed that the preferred option was not always the most environmentally beneficial option. The SEA sought to ensure that the most environmentally sound option was the one taken forward, however, for reasons outwith SEA considerations, this was not always the case. Details of any instances where this has occurred are also set out within the Environmental Assessment section of the ER. The context for these balance judgements is discussed further within preceding section 4 of this s18 statement.
- 8. Measures to be taken to monitor significant environmental effects of LDP2 implementation**
- 8.1 Section 19 of the Environmental Assessment (Scotland) Act 2005 requires the responsible authority (in this instance, South Ayrshire Council) to monitor the significant environmental effects of LDP2's implementation so that any unforeseen adverse effects can be identified at an early stage and remedial action taken.
- 8.2 For monitoring to achieve its above-noted purpose, a monitoring methodology requires to detect and measure the environmental outcomes of LDP2, including the plan's performance against pre-defined environmental objectives or targets where relevant and identified. Effective monitoring can contribute to managing uncertainty, improving knowledge, enhancing transparency and accountability and aid management of environmental information.
- 8.3 It is acknowledged that NPF4 is now adopted by Scottish Government as of 13th February 2023 upon which it forms part of the development plan alongside LDP2. In hypothetical terms, the status of NPF4 could fragment monitoring scope and responsibilities for the development plan as a whole, given NPF4 is liable for environmental assessment, plan review and monitoring by Scottish Government itself. Additionally, an outset monitoring strategy may in time come to be augmented and influenced by evolving statutory context as planmaking provisions of the 2019 Act take effect via forthcoming regulation. Thus duties and processes arising therefrom may come to be of growing relevance when monitoring the environmental implications of this plan, especially as the environmental baseline evolves towards the end of its lifetime – and in the course of considering the strategic direction of its replacement with a 'new regime' LDP3.
- 8.4 Nevertheless, whilst cognisant of likely future evolution in the new-form development plan landscape, the draft monitoring strategy has been prepared relative to the principal context of pertaining to the environmental effects of LDP2 itself, and its details are set out within Table 10-1.

A monitoring strategy for LDP2

- 8.5 The monitoring strategy has been developed from the SEA objectives and indicators deployed via the environmental report, the existing environmental baseline, significant effects identified during the environmental assessment process and any proposed mitigation measures intended to alleviate adverse effects.
- 8.6 Monitoring is a key part of the cyclical SEA process and its framework (as presented in Table 8-1 overleaf) has been refined throughout the development of LDP2. Monitoring focus duly bears upon:
1. The significant environmental effects that give rise to irreversible effects on environmental attributes of a recognised value. Monitoring seeks to identify trends in advance of such irreversible damage being caused;
 2. Significant effects where considerable uncertainty has been evident throughout the SEA process and where monitoring could enable remedial action to be taken; and,
 3. Effects where a lack of information could constrain the decision-making process associated with the delivery of projects e.g. the gathering of data over an extended timescale.
- 8.7 Monitoring helps consider whether predictions made within the SEA assessment process were accurate and whether the proposed mitigation measures are proving effective. If monitoring predicts or moreover indicates a significant issue, preventative or remedial action respectively may be required: this would involve identifying and analysing any failing aspects of the plan whilst LDP2 remains extant. Where any significant impacts are identified as a result of the monitoring strategy these will be iteratively addressed as part of the LDP3 plan preparation process, which shall proceed under the auspices of the succeeding legislative framework introduced by the Planning (Scotland) Act 2019. The timeline for same shall be intimated by the latest annual update of the Development Plan Scheme.

Table 8-1: Monitoring Strategy

SEA topic	Indicator	Data source	Who is responsible for obtaining the data?	When should remedial action be taken?	What remedial action can be taken?
Biodiversity, flora and fauna	Volume and effect of development proposals permitted within sites of natural heritage designation	Planning applications, selective SNH consultation comments as interpreted in conjunction with universal relevance of prevailing standing advice.	South Ayrshire Council	When there is an identified threat to or deterioration in the quality of natural heritage assets within South Ayrshire owing to development pressure/activity	Review LDP natural heritage policy with SNH expertise to ensure that biodiversity implications are duly protected in the development management process
Cultural heritage	The number of listed buildings within South Ayrshire on the Buildings at Risk Register (BARR).	Historic Environment Scotland	South Ayrshire Council	When there is a significant increase in the number of listed buildings within South Ayrshire on the BARR.	Policy review in the context of how investment in existing cultural heritage features can be encouraged.
	Environmental quality of existing and new conservation areas	SAC (professional judgement)	South Ayrshire Council	When there is a significant deterioration in the environmental quality of conservation areas.	Policy review in the context of how greater investment in conservation areas can be encouraged.
Water	Water quality of all watercourses for which SEPA hold data.	SEPA	South Ayrshire Council	When there is a significant deterioration in the water quality of watercourses within South Ayrshire, linked to development activity	Review LDP water quality policy in conjunction with SEPA to ensure water quality implications are given due regard development management assessments.
	Any development constructed on areas identified as being at risk from flooding, allowing for climate change.	Planning applications, SEPA consultation comments.	South Ayrshire Council	Preventative action prior to any development, through the application of mitigation measures in agreement with SEPA.	If a flooding incident occurs, there may be a requirement to review the flooding and development policy of the LDP at national level.
Soils, geology and land use	Total area, and status longevity, of vacant and derelict sites within South Ayrshire	Scottish Vacant and Derelict Land Survey (annual)	South Ayrshire Council (on behalf of Scottish Government)	Upon statutory plan review	Create a policy context with greater focus on the redevelopment / rehabilitation of vacant and derelict land
	Extent and integrity of peat resources	British Geological Survey; SNH	South Ayrshire Council	When development adversely impacts peat resources	Strengthen policy position
Landscape	General themes appearing in terms of landscape impacts as a result of consented planning applications and selective SNH	Planning application decisions (cumulative) as corroborated against selective SNH consultation input, alongside relevant standing advice.	South Ayrshire Council	When there is an identified threat to or deterioration in the quality of landscape assets within South Ayrshire owing to development pressure/activity	Review LDP landscape policy with SNH expertise to ensure that landscape implications are duly protected in the development management process across the

	consultation input in conjunction with standing advice	LLA Designation Review Report			lifetime of successor development plan/s
Air quality	Air quality objectives not being met within South Ayrshire	Environmental Health	South Ayrshire Council	When air quality objectives are not met.	Consult with Environmental Health on relevant applications to ensure acceptable standards.
Climatic factors	Development constructed on areas identified as being at risk from flooding, with allowance for climate change.	Planning applications, SEPA consultation comments.	South Ayrshire Council	Preventative action prior to any development, through the application of mitigation measures agreed by SEPA.	If a flooding incident occurs, there may be a requirement to review the flooding and development policy of the LDP at national level.
	Trajectory of greenhouse gas emissions, nationally and corporately	Scottish Government; South Ayrshire Council	Scottish Government; South Ayrshire Council	Upon any regression of progress nationally, or where progress by South Ayrshire Council falls behind national progress	Consult with Building Standards on energy efficiency in construction. Review spatial strategy to consider more stringent centralisation of growth.
Noise	Level of noise-related complaints in town centres and predominantly residential areas.	Environmental Health	South Ayrshire Council	When there is a significant increase in the number of noise-related complaints	Consult with Environmental Health; adopt a more restrictive approach and/or review policy
Human health	Percentage of the South Ayrshire population considered to be in good health.	National census data	South Ayrshire Council	When there is deterioration in the percentage of people within South Ayrshire in good health.	Create and enhance active travel opportunities. NB. a wide range of factors beyond the control of the LDP will influence human health.
Population	Headline population trend for South Ayrshire in conjunction with age profile demographics and employment rates	National census data	South Ayrshire Council	When there is a significant increase in unemployment rates or shifts towards an unsustainably imbalanced demographic profile	Review policy position to ensure network of centres supports job-creating investment. Ensure housing land supply caters for needs across the demographic.
Material assets	Quality of infrastructure network, including waste management, supporting population and economy.	Ayrshire Roads Alliance (and site visit observations)	South Ayrshire Council	When infrastructure network function and congestion levels impair economic activity and people's access to resources	Ensure that proposals to support upgrades to the infrastructure network, relieve congestion and manage waste are fully supported.

9. Conclusion

- 9.1 The subject matter of this statement of particulars is a unitary local development plan for the whole South Ayrshire planning authority area. South Ayrshire Local Development Plan 2 (LDP2) has been produced consequent to statutory review of the preceding development plan, and as adopted it now supersedes both the South Ayrshire Local Development Plan (SALDP) (2014) and the Town Centre and Retail Local Development Plan (TCRLDP) (2017).
- 9.2 By its nature a local development plan has to cover a wide range of issues to ensure that planning decisions are taken based on balancing a range of considerations including those of an environmental nature. It is therefore the case that policies designed to protect the environment would form part of an LDP by default, regardless of strategic environmental assessment legislation. It is therefore considered that whilst the SEA has had some influence over the content of LDP2 as adopted, this ought not be exaggerated owing to the fact that much of the policy scope and intent would have and has been in place already, cumulatively via the superseded development plan and higher-order plans (especially Scottish Planning Policy) respectively.
- 9.3 Nonetheless, the statement duly notes how the environmental report has been taken into account in the preparation and finalisation of LDP2, indicated by the duality of the respective iterative processes illustrated via Figure 4-1 – and in what regard the SEA process has influenced and added value to LDP2 from an environmental perspective within the contextual limitations described by this statement. The most readily identifiable examples of its influence have been noted in this statement – principally as effected by certain mitigation measures it has proposed and secured.
- 9.4 This statement further presents how opinions expressed on the environmental report via statutory consultation processes have been taken into account, and sets out the rationale for choosing LDP2 as adopted in light of having considered reasonable alternatives.
- 9.5 Finally, the statement establishes the centrality of monitoring to the cyclical SEA process and has illustrated a bespoke monitoring strategy developed for LDP2 from the plan's SEA objectives originally identified at the SEA scoping stage.

Appendix A – Account taken of opinions expressed

A(i) – Scoping consultation input (2016)

Consultation Body	Ref. Scoping Report Ref.	Consultation Body Comment	Account taken of opinions expressed (see Interim ER)
Historic Environment Scotland Ref: LDP/SAYR (31 Aug 2016)	1. General comments	On the basis of the information provided, I am content with this approach and am satisfied with the scope and level of detail proposed for the assessment, subject to the detailed comments provided in the attached annex.	Noted.
	1. General comments	I note that Section 7: Next Steps of the Scoping Report sets out that South Ayrshire Council intends to consult on the Environmental Report in March 2017 for a period of six weeks. We are content with this. Please note that, for administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.	Noted.
	1. General comments	Overall, we are broadly content with the content of the SEA Scoping Report and welcome the scoping-in of the historic environment (under Cultural Heritage) as an SEA assessment topic.	Noted.
	2. Detailed comments (Annex) 4. Framework for assessing environmental effects	It would be useful, however, to have been provided with some further detail regarding the elements of the Main Issues Report and how these will interact with the Assessment Matrix at Table 4-2. Is it proposed, for example, to assess both the policy elements of the plan and the proposed development allocations and their alternatives through this matrix?	The MIR considers both policy themes and development allocations, and respective alternatives; these are assessed in the IER per assessment matrix. See Appendices C & D.
	Table 3-1: Relevant PPS Review Appendix A: PPS Review	We also note that relevant plans, programmes and strategies have been identified in relation to LDP2 at Table 3-1. We'd recommend updating this table to reflect the recent publication of the Historic Environment Scotland Policy Statement (HESPS) 2016 to replace the Scottish Historic Environment Policy (SHEP) 2011.	The PPS review has been updated in the IER in accordance with this recommendation. See Appendix A.

	Table 3-4: Development of SEA Objectives	<p>We note that, following the review of relevant plans, programmes and strategies, a key policy implication identified for the Cultural Heritage topic area within Table 3-4 is for the sensitive location of development proposals in relation to cultural heritage features. While we would agree with this aim, we would also highlight the potential for development proposals to enhance cultural heritage features through re-use or restoration.</p> <p>We'd therefore suggest some slight alteration to the SEA Assessment Objective for Cultural Heritage at Table 3-4 to read:</p> <p>'Safeguard and, where appropriate, enhance cultural heritage features and their settings.'</p>	The SEA Assessment Objective has been updated in the IER in accordance with this recommendation. See Section 4, Table 4-2.
	4.2 Alternatives, Mitigation and Residual Effects	We consider that the responsible design and positioning of development are mitigatory measures to be explored in a later part of the assessment matrix.	These suggested measures have been borne in mind when advancing mitigation proposals as part of the assessment process, and reflected in the mitigation proposed where appropriate. See Table 7.1 and Appendix C.
	Table 3-5: SEA objectives and associated questions	We also suggest amending the SEA question for the Cultural Heritage topic area in Table 3-5 to include inventory designed landscapes and any non-designated cultural heritage features.	The SEA question has been updated in the IER in accordance with this recommendation. See Section 4, Table 4-3.
	1. General comments	We are broadly content with the framework for assessing effects and the example assessment matrix at Section 4 of the Scoping Report.	Noted.
SEPA Ref: PCS/148596 (12 Sept 2016)	1. General comments	Subject to the comments in Appendix 1 below we are generally satisfied with the proposed scope and methodology of the assessment.	Noted.

	<p>2. Detailed comments (Appendix 1) Table 3-1: Relevant PPS Review Appendix A: PPS Review</p>	<p>As you undertake the full and comprehensive review of relevant PPSs as part of the SEA process we recommend you refer to our standing advice on SEA scoping and topic specific guidance on air, soil, water, material assets and human health, available through our website, which includes reference to other PPS which may be relevant to the plan.</p> <p>For information, some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to LDP2. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere.</p>	<p>This resource is noted and has been helpful in informing further additions to the PPS Review.</p> <p>See Appendix A.</p> <p>These recommendations have been instrumental in informing a thorough update of the environmental baseline, data for which has incorporated the reviewed PPSs as far as possible. See Section 3: and Appendix B.</p>
	<p>Table 3-2: Environmental baseline data</p>	<p>With reference to Table 3-2, whilst we acknowledge this represents an initial overview of the baseline data, we note that this forms the basis for the scope of the assessment; it is therefore essential that a thorough baseline is collected for each issue. We have highlighted a number of areas for consideration in Table 1 below. This is not exhaustive and, as noted above, we recommend reference to our standing advice and topic specific guidance for further advice on matters within our remit.</p>	<p>These recommendations have been instrumental in informing a thorough update of the environmental baseline, the SEA topics within which have now incorporated the suggestions made as far as possible. See Section 3 and Appendix B.</p>
	<p>Table 3-3: Scoping in/out of SEA topics</p>	<p>We agree that in this instance all environmental topics should be scoped into the assessment.</p>	<p>Noted.</p>
	<p>4: Framework for assessing environmental effects</p>	<p>We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental effects.</p>	<p>Noted.</p>
	<p>Table 3-4: Development of SEA objectives</p>	<p>We would recommend that the SEA objectives are updated, as necessary, to reflect any revised baseline (see comments in Section 2 above). This could, for example, include adopting an objective for water “to protect and enhance the state of the water environment” and for soil “to maintain or improve soil quality and prevent any further degradation of soils”. We note and welcome the objective included for flood risk but consider this to be slightly unclear; an objective “to reduce the risk of flooding” may be stronger. Our topic specific guidance may offer further useful suggestions for SEA objective and sub objective wording for matters in our remit.</p>	<p>The SEA objectives table has been updated with due regard to both the advice given and the revisions to the environmental baseline. See Section 4, Table 4-2.</p>
	<p>4: Framework for assessing environmental effects Table 4-2: Example Assessment Matrix</p>	<p>We welcome the proposed assessment matrix approach with scoring provided in Table 4-2. For information, including a commentary section within the matrices in order to state, where necessary, the reasons for the effects cited and the score given would help to fully explain the rationale behind the assessment results. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered. This allows the Responsible Authority to</p>	<p>The assessment matrix incorporates textual commentary as a central component. See Section 4.3, Table 4-5 And Appendix C. The matrix commentary endeavours to account for contextual assumptions and procedural limitations; also explored where</p>

		be transparent and also allows the reader to understand the rationale behind the scores given.	relevant in the assessment outcome summaries within Section 7.
	4: Framework for assessing environmental effects Table 4-2: Example Assessment Matrix	It is helpful if the assessment matrix directly links the assessment result with proposed mitigation measures such as in the example below <i>[example matrix]</i>	The textual commentary which is central to the assessment matrix format (see above) accommodates mitigation measure proposals. See Appendix C.
	Table 3-5: SEA objectives and associated questions 4: Framework for assessing environmental effects Table 4-2: Example Assessment Matrix	When it comes to assessment of the effects of allocations or sites we advocate a rigorous methodology which clearly assesses potential effects on all environmental topics. Our experience in relation to assessment of allocations is that it can be a much easier and useful exercise for the plan-maker if the assessment is made against a range of related questions, rather than directly against the environmental topics. This allows a very practical assessment to take place which clearly highlights the environmental benefits and costs of each individual allocation. As an example, assessing the allocation against the question “Can the allocation connect to public sewage infrastructure?” gives a clear practical view on how this allocation is likely to affect the water environment.	Noted. The SEA objectives associated with each SEA topic have in turn been used to formulate SEA questions, which act as focusing tools forming the basis for the assessment process – in accordance with this advice.
	4: Framework for assessing environmental effects Table 4-2: Example Assessment Matrix	We would draw your attention to the joint SEA and development plan site assessment pro forma which sets out the issues which we require to be addressed in more detail.	This pro forma has been cross-referenced against the SEA questions developed and has acted as an additional reference point during the assessment process for site-specific proposals. See Appendix C.
	4.2: Alternatives, Mitigation and Residual Effects	We note that alternatives are still being considered. Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the Environmental Report.	A structure of sequential assessment of preferred options and alternatives is reflected in the outcome summaries (Section 7) and assessment matrix (Appendix C). Comparative analysis of the assessment outcomes will explicate the preferred option selection.
	4.2: Alternatives, Mitigation and Residual Effects	We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.	Where appropriate and achievable, the environmental assessments will make recommendations, identify mitigation measures and/or propose further alternatives to the MIR proposals in order to reduce potential adverse effects or enhance those of a beneficial nature.

	4.2: Alternatives, Mitigation and Residual Effects	It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.	Assessed effects and mitigation proposed should be seen to bear a self-evident correlation. See Appendix C.												
	4.2: Alternatives, Mitigation and Residual Effects	<p>We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).</p> <p>One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA.</p>	<p>The textual commentary which is central to the assessment matrix format (see above) accommodates mitigation measure proposals. Assessed effects and mitigation proposed should be seen to bear a self-evident correlation. See Appendix C.</p> <p>Moreover, Table 7-1 accords with Schedule 3 of the Act and sets out MIR responses to mitigation suggested as a result of the assessment process, alongside a reassessment reflective of applying the mitigation as taken on by the revised MIR position.</p>												
	4.2: Alternatives, Mitigation and Residual Effects	<p>Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process.</p> <table border="1" data-bbox="904 922 1688 1166"> <thead> <tr> <th data-bbox="904 922 1115 995">Issue / Impact Identified in ER</th> <th data-bbox="1115 922 1301 995">Mitigation Measure</th> <th data-bbox="1301 922 1509 995">Lead Authority</th> <th data-bbox="1509 922 1688 995">Proposed Timescale</th> </tr> </thead> <tbody> <tr> <td data-bbox="904 995 1115 1069">Insert effect recorded in ER</td> <td data-bbox="1115 995 1301 1069">Insert mitigation measure to address effect</td> <td data-bbox="1301 995 1509 1069">Insert as appropriate</td> <td data-bbox="1509 995 1688 1069">Insert as appropriate</td> </tr> <tr> <td data-bbox="904 1069 1115 1166">etc</td> <td data-bbox="1115 1069 1301 1166">etc</td> <td data-bbox="1301 1069 1509 1166">etc</td> <td data-bbox="1509 1069 1688 1166">etc</td> </tr> </tbody> </table>	Issue / Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale	Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate	etc	etc	etc	etc	<p>Where proposed mitigation is extrinsic to the content of the plan this is fully identified and explained within Table 7-1, within the overall context of the MIR's accounting for and response to the suite of recommendations proposed by the assessment.</p>
Issue / Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale												
Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate												
etc	etc	etc	etc												
	4.5 Monitoring	<p>Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. We therefore welcome the intension to include a monitoring framework within the ER and recommend that this include a description of the measures envisaged to monitor the significant environmental effects of the plan.</p>	<p>Noted. The monitoring framework as set out in Table 10-1 sets out a series of monitoring indicators aligned to respective SEA topics, alongside proposed action trigger points and action to be taken when so triggered.</p>												

	6.2 Environmental report consultation	We are satisfied with the proposal for a 6 week consultation period for the Environmental Report.	Noted.
	6.3 Environmental Report and Post Adoption ES	We would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.	Appendix E represents such a summary, intended to meet this recommendation.
SNH Ref: 01219 (26 Aug 2016)	1. General comments	Subject to the specific comments below and in the annex, we are content with the scope and level of detail proposed for the environmental report. We note that all the SEA topics are currently scoped in.	Noted.
		However, we are disappointed there is no information presented within the scoping report on the environmental baseline and SEA objectives for biodiversity, flora and fauna and landscape. We have therefore recommended some baseline data sources for these respective topics which we hope are useful. We have also recommended some SEA objectives for these topics and added additional objectives for other areas of our interest for your consideration.	Thank you for highlighting this unintentional omission owing to administrative error. This omission has been resolved in the Interim ER with the aid of your recommendations; see section 3.2 and tables 4-2 and 4-3.
		We note that a period of six weeks is proposed for consultation on the Environmental Report and we are content with this proposed period.	Noted.
	2. Detailed comments (Annex) Table 3-2: Environmental baseline data	<p>There is no inclusion of any data for the topic of Biodiversity, Flora and Fauna or no inclusion of potential implications for the LDP. Some potential baseline data could be that South Ayrshire has International/ European/ National and Local nature conservation designations, requiring protection from the adverse effects of development. Ailsa Craig has been designated a Special Protection Area (SPA) under the EC Birds Directive (1979), and parts of Glen App and the Galloway Moors are designated SPAs. Under the EC Habitats Directive (1992), the Lendalfoot Hills Complex and Merrick Kells (partly in Dumfries and Galloway) are designated Special Areas of Conservation (SAC). Land use in South Ayrshire is predominantly rural so there is a need to avoid loss of habitats and priority LBAP species as a result of the conversion of farmland and semi-natural habitats to development. There is therefore the potential for development to lead to fragmentation of habitats and wildlife corridors, resulting in isolation of populations of rare or threatened species.</p> <p>The SNH natural spaces is a good data resource for international and national natural heritage designations http://gateway.snh.gov.uk/natural-spaces/index.jsp</p>	These recommendations have been instrumental in informing a thorough update of the environmental baseline, the SEA topics within which have now incorporated the suggestions made as far as possible. See Section 3 and Appendix B.

		<p>There is no inclusion of any data for the topic of Landscape or no inclusion of potential implications for the LDP. A wildland area has been identified in the Merrick and the existing South Ayrshire Local Plan has designated almost two-thirds of South Ayrshire as a Scenic Area. There are also 28 Tree Preservation Orders. There is the potential for development to adversely affect these landscapes and the local landscape character.</p> <p>The SNH natural spaces is a good data resource for showing the extent of wild land area in South Ayrshire http://gateway.snh.gov.uk/natural-spaces/index.jsp</p>	<p>These recommendations have been instrumental in informing a thorough update of the environmental baseline, the SEA topics within which have now incorporated the suggestions made as far as possible. See Section 3 and Appendix B.</p>
		<p>Within the topic of soils, geology and land use we recommend the topic is widened out to consider valuable soils such as prime agricultural soils and carbon rich soils. The LDP has an important role in directing development away from these valuable soils. A new data source is the Carbon and Peatland map 2016 which is now available for download as a GIS shape file http://gateway.snh.gov.uk/natural-spaces/index.jsp</p>	<p>These recommendations have been instrumental in informing a thorough update of the environmental baseline, the SEA topics within which have now incorporated the suggestions made as far as possible. See Section 3 and Appendix B.</p>
	Table 3-4: Development of SEA objectives	<p>There is no mention of biodiversity, flora and fauna within the SEA objectives. Some potential SEA objectives are suggested below</p> <p>Does the policy/proposal impact on avoid adverse effects on protected habitats and species?</p> <p>Does the policy/proposal enhance biodiversity?</p> <p>Does the policy/proposal avoid adverse effects on all habitats and species?</p>	<p>Thank you for highlighting this unintentional omission owing to administrative error. This omission has been resolved in the Interim ER with the aid of your recommendations; see section 3.2 and tables 4-2 and 4-3.</p>
		<p>There is no mention of landscape within the SEA objectives. Some potential SEA objectives are suggested below</p> <p>Does the policy/proposal avoid adverse impacts on protected landscape, wild land and geodiversity?</p> <p>Does the policy/proposal avoid adverse effects on all Landscapes?</p> <p>Does the policy/proposal enhance landscape quality?</p>	<p>Thank you for highlighting this unintentional omission owing to administrative error. This omission has been resolved in the Interim ER with the aid of your recommendations; see section 3.2 and tables 4-2 and 4-3.</p>
		<p>Soils geology and land use – We recommend that this topic should be widened out to give consideration to the possible disturbance of valuable soils such as prime agricultural land and carbon rich soils. Soil organic matter underpins many soil functions. It is particularly important as a carbon store and this has implications for climate change. A potential additional SEA objective could be</p>	<p>The suggestion is welcomed and agreed.</p> <p>The SEA objectives table has been updated with due regard to both the advice given and the revisions to the environmental baseline. See Section 4, Table 4-2.</p>

		“avoid adverse impacts on valuable soil resources e.g. prime agricultural land, carbon rich soils”	
		Health – We recommend that the multiple benefits of protecting and where possible enhancing the green network should be included within the SEA. A potential additional SEA objective could be “to enhance and protect the green network to deliver multiple benefits to people and nature”	The suggestion is welcomed and agreed. The SEA objectives table has been updated with due regard to both the advice given and the revisions to the environmental baseline. See Section 4, Table 4-2.
	Table 4-2: Example Assessment Matrix	When it comes to assessment of the effects of allocations or sites we advocate a rigorous methodology which clearly assesses potential effects on all environmental topics. Our experience in relation to assessment of allocations is that it can be a much easier and useful exercise for the plan-maker if the assessment is made against a range of related questions, rather than directly against the environmental topics. This allows a very practical assessment to take place which clearly highlights the environmental benefits and costs of each individual with where relevant mitigation being built into the plan. An example template can be found here http://www.snh.gov.uk/docs/A1636437.pdf	Para 4.1.4 of the Scoping Report confirms application of the questions as the methodological basis for the assessments. See Tables 4-2 and 4-3 of the IER for the derivation of SEA objectives and questions respectively, and Appendix C for the assessment matrix whose scorings and commentaries are informed by the questions.
	5: Habitats Regulations Appraisal	Habitats Regulations Appraisal- We welcome the text in section 5 on the approach to integrate the environmental report with the Habitats Regulations Appraisal. IF this is taken forward we recommend that the title of the document should include reference to the HRA as well as to it being the Environmental Report. It is also important the findings of both appraisals are clearly documented, that the HRA record is clearly separated within the Environmental Report and uses the correct, precise HRA terminology. We would be very happy to have an early discussion with you on the HRA process	(See HRA Record apart)

Appendix A(ii) – Interim ER consultation input (2018)

Consultation Authority	Ref.	Consultation Authority Comment	Account taken of opinions expressed (see Final ER)
<p>Historic Environment Scotland</p> <p>Ref: LDP/SAYR</p> <p>Case ID: 300020243</p> <p>(31 Jan 2018)</p>	<p>Annex 2: Interim Environmental Report</p>	<p>We consider that the introductory sections of the Interim Environmental Report clearly set out the purpose of Strategic Environmental Assessment (SEA) and how it relates to the preparation of the emerging development plan. We particularly welcome where the Main Issues Report has been produced in close relationship with the Strategic Environmental Assessment (SEA) process. We also welcome where the implications of current historic environment legislation and policy are identified at Appendix A in support of the development of the Plan.</p>	<p>Feedback noted with thanks.</p>
	<p>Environmental Baseline</p> <p>(cf. Ch 3 of IER)</p>	<p>We welcome that the Cultural Heritage topic area has been scoped-in to the assessment and the overview of South Ayrshire’s heritage assets included in the baseline chapter. We note that this analysis concentrates on South Ayrshire’s designated heritage assets, and would also recommend additional concentration on the area’s non-designated heritage assets. We note that the baseline analysis identifies buildings at risk within Ayr town centre as a key environmental issue for the Cultural Heritage topic area.</p>	<p>Chapter 3’s environmental baseline has been updated with discussion of non-designated heritage assets to ensure it is not inferred by omission that South Ayrshire’s cultural heritage value derives solely from designated assets. NB. SAC has not as yet formally or informally identified at local level any non-designated assets, by way of ‘lists’ or otherwise.</p>
	<p>Assessment Framework</p>	<p>We note that sites considered as potential housing allocations are afforded preliminary consideration through a Matrix within the ‘Site Selection’ Appendix. We have reviewed this Matrix and note that potential effects on the historic environment are considered here. We note that this section of the Matrix is entitled ‘Built Environment Constraints’ and we would recommend that this should be re-titled as ‘Historic Environment Constraints’ to ensure that potential effects on all heritage asset types, including archaeology, are given due consideration.</p>	<p>The Land Assessment Framework, which further develops site allocation environmental assessments in greater detail, incorporates multiple assessment themes which relate to a wide variety of heritage asset types.</p>

		<p>It appears that each site has been subject to thorough consideration, however we would disagree with the ‘amber’ scoring for site <i>CFS 59</i>. It is our view that development over further green field elements of land in this area would give rise to significant adverse effects on the settings of the heritage assets located within the site boundary and that this scoring should be changed to ‘red’. It is also our consideration that the findings of this assessment should have been incorporated into the body of the Interim Environmental Report with the aim of identifying cumulative environmental effects resulting from the implementation of the plan or its alternatives.</p>	<p>The Land Assessment Framework duly and fully incorporates detailed site assessment findings within the body of the ER proper. The LAF assessment for <i>CFS59</i> produces ‘red’ (-2) graded scorings for multiple heritage asset assessment themes, in line with HES’ advice.</p>
		<p>We also note that the Main Issues Report proposes to incorporate many existing development plan policies and proposals into the South Ayrshire Local Development Plan 2. While these policies and proposals have already been subject to recent Strategic Environmental Assessment (SEA) in support of the adopted South Ayrshire Local Development Plan (2014) and the Town Centre and Retail Local Development Plan (2017), we consider that the Interim Environmental Report would have benefitted from incorporating the findings of the previous assessments so as to more fully explore any potential cumulative effects emerging from the policy options under consideration as part of the Main Issues Report.</p>	<p>The evolution of the MIR into the self-contained PLDP is reflected in the Final ER by a comprehensive assessment of the PLDP as a whole, inclusive of incorporated existing policies, which should address these recommendations.</p>
	Environmental Assessment	<p>We note that this assessment does not include any analysis of where the ‘Additional Issues for Consideration’ identified at Section 3 of the Main Issues Report may result in additional environmental effects. Should further policy options be developed to address the issues identified here, we would recommend that these should be subject to Strategic Environmental Assessment.</p>	<p>Feedback noted, this will be followed through as advised should indeed such further policy options be developed.</p>
		<p>We welcome the analysis of the potential environmental effects of the policy options within the Main Issues Report and their alternatives included here and within the Assessment Matrix at Appendix C. We particularly support the robust and considered analysis of effects on the Cultural Heritage topic area at Appendix C. This includes a welcome consideration of where communities may creatively re-use heritage assets and, also, where a focus on town centre development and renewal may ensure also the continued re-use of historic buildings, features and spaces. The assessment at Issue 2 also highlights the potential for adverse effects on historic environment features caused by the Spaceport development. We note that, overall, the assessment of effects predicts uncertain outcomes for the ‘Cultural Heritage’ topic area.</p>	<p>Feedback noted with thanks.</p>
<p>SEPA Ref: PCS/156192 SG Ref: SEA/01219ER (30 Jan 2018)</p>	<p>Appendix 1: Comments on the Environmental Report General comments</p>	<p>We note that the proposed sites for LDP2 were not consulted on externally before the MIR was published and therefore the full range of comments on the sites has not been considered in the environmental report. A full assessment of sites should be undertaken as part of the SEA for the proposed plan.</p> <p>We welcome the amendments that have been made following our scoping comments in our response of 12 September 2016. However, we feel that the following changes would give a more comprehensive picture of the effects of the plan.</p>	<p>Feedback noted with thanks.</p> <p>The Land Assessment Framework within the Final ER represents a full assessment of shortlisted site allocations.</p>

	Detailed comments	<p>Section 3.2 Statutory Requirement describes the environmental context of LDP 2. Some of the statements made in this section could be clearer in relation to information provided later in the Environmental Report.</p> <p>3.2.22 The air quality data referred to is 2015 but 2016 data is mentioned in Appendix B;</p> <p>3.2.31 Climatic Factors – indicates that there is no baseline data but in Appendix B baseline data is shown as greenhouse gas emissions.</p> <p>Additionally some sections could be expanded:</p> <p>3.2.12 in the water section flooding is generally referred to as coastal and no mention is made of the Strategic Flood Risk Assessment (SFRA) for the area;</p> <p>3.2.33 material assets are confined to infrastructure. We do not consider this to be the case and in our previous response recommended waste information and heat maps to be considered.</p>	<p>Clarifications and consistency improvements have been made in discussion of air quality and GHG emissions, and these corroborate with Appendix B.</p> <p>Content on water has been added to and clarified in order to reference the different types of flooding and the role of the SFRA.</p> <p>The material assets section has been comprehensively expanded in line with recommendation to include the facets of energy/heat demand and supply, natural assets and waste management infrastructure.</p>
		<p>We also consider that the SEA objectives and questions in Table 4.2 and 4.3 should be expanded. Climatic factors only refer to greenhouse gas emissions, flooding is not mentioned. Reference to green networks could usefully include blue networks.</p>	<p>SEA objectives and questions have been expanded in line with these recommendations to incorporate climate change-related flooding and blue networks.</p>
		<p>Table 10.1: Monitoring Strategy The SEA water topic refers to water quality of watercourses in and around town centres. We consider that this too restricted and all watercourses that we hold data for should be considered. The climatic factors topic refers to flooding and there is no mention of greenhouse gas emissions.</p>	<p>Monitoring measures have been improved to universalise consideration of watercourses, and a new measure added to capture consideration of changes to greenhouse gas emissions.</p>
	Appendix B – Baseline data	<p>We note that our recommendations for baseline data in Table 1 of our scoping response have not been included in the Environmental Report. In order for the SEA to comprehensively consider the full range of potential environmental effects of LDP2 the baseline data must be thorough.</p> <p>The data for soils does not include contaminated land; Climatic factor data only includes greenhouse gas emissions; Material assets information does not refer to waste data.</p>	<p>Thank you for the alert on outstanding omissions. These have been rectified to the extent made possible by availability of data, noting in particular that contaminated land is recognised nationally as a challenging data subject regards lack of source material / data collection regimes.</p>
SNH Ref: CEA148364 / A2501544 (30 Jan 2018)	General comment	<p>Our comments on the SEA are provided in the attached Annex. At this stage, it is too early in the plan preparation cycle to undertake substantive work on the Habitats Regulations Appraisal (HRA) of the LDP. We would be happy to discuss the HRA with you at the appropriate stage.</p>	<p>Noted, thanks. See section 6 comment / response, below.</p>

	Annex	Key principles of SEA set out in PAN 1/2013 include proportionality and the benefits of focusing on clear and succinct assessment. The interim Environmental Report adopts this approach in the scope of the assessment. However, we found the discursive content of Chapters 1 to 6 unclear and we have concerns about the accessibility of this report to non-technical audiences who will have an interest in the environmental assessment of the MIR and Proposed Plan.	Council regret the opinion expressed regarding report text; note that no other CA raised the same concern and indeed HES, to the contrary, were complimentary of the explanatory content's clarity. Would further note there has been no negative feedback received from 'non-technical audiences' in this regard, following public consultation.
	Section 4 – Assessment Framework	We generally agree with the approach to assessing main areas of change that is set out in this section. However, there are several references in Section 4 to “material effect” and “material change” which we feel should be reconsidered. SEA is based upon assessment of “significant effect” and the use of “material effect” may confuse the environmental assessment of strategy and proposals with consideration of their planning merits. We recommend that the assessment of policy and proposals focuses on significant effect.	The terminology used within this section has been amended for clarity and the avoidance of doubt, as recommended.
	Section 6 – Other Environmental Assessments	This section includes discussion of the required Habitats Regulations Appraisal (HRA), noting in paragraph 6.1.3 that there is insufficient detail for an assessment to be carried out with confidence. In reference to paragraphs 3.10 to 3.13 of our HRA Guidance for plan-making bodies, it should be possible at this stage to identify relevant European sites and therefore remove any options where it is not possible to identify mitigation that would avoid Likely Significant Effect. Further analysis, including the assessment of allocations, should accompany the Proposed Plan. We can provide further advice on HRA as the Proposed Plan and its accompanying assessments are drafted.	Section 6 as-was duly identified relevant European Sites and explicitly dealt with LSE under methodology stage-5 step-3. Post-MIR, due process was followed in utilising the 2015 Guidance to prepare an HRA record, the draft of which has been subject to consultation with SNH in advance of publication of PLDP2.
	Section 7 – Environmental Assessment Table 7-1 Mitigation and Recommendations	The relationship of the assessment of policy options in Table 7-1 to the SEA questions set out in Table 4-3 is not clear. The assessment does not consider whether SEA topics are enhanced, adversely affected, etc. and the mitigation hierarchy set out in paragraph 5.1.2 does not appear to have influenced the recommendations or MIR response.	Table 7-1 reproduces in condensed format (for ease of reference) both the summary assessment outcome, and suggested mitigation, from the full assessment matrices comprising Appendix C which represents the assessment considerations in their fullest extent. The mitigation hierarchy received implicit consideration throughout recommendations made; note limited potential for and relevance of explicit implication in the high-level and thematic discourse of the MIR options. Accordingly this is evolved as appropriate for PLDP2.
	Appendix C – Assessment Matrix	Issue / Comment <i>The Vision Statement</i>	Critiquing assessment findings at a fine level of subjective detail amounts in many cases to matters of interpretation. Where a critical stance has been adopted, this is

	<p>The assessment of the Biodiversity, Flora and Fauna topic states that realising the potential to “benefit habitats, species and biodiversity depends upon the interpretation of the vision ... securing them is uncertain pending interpretation.” This should be reviewed as issues covered by this topic (European sites, national designations and protected species) should not be adversely affected by “interpreting what balance of competing interests is considered ‘sustainable’ within a given perspective”. There are clearly defined tests for each of these that should be applied where they may be affected by development. Given the uncertainty set out in the current assessment, we recommend that the scoring given to this topic is reviewed.</p> <p>Under the Soils, Geology and Land Use topic, the rationale of “brownfield reuse can contribute to an ‘inclusive’ community by helping to regenerate deprived areas, whereas a ‘dynamic’ community may prioritise the viability of greenfield growth at the expense of prime agricultural land” is unclear. ‘Inclusive’ and ‘dynamic’ appear to stem from Community Planning for South Ayrshire; we recommend that further explanation of the source of these community priorities/types is provided if this rationale is carried into the next iteration of the Environmental Report. The likely meaning of ‘inclusive’ appears to change throughout the assessment of the Vision as Climatic Factors includes reference to ‘inclusive’ housing development on greenfield land. We also recommend that the potential for ‘type’ of community is not used as a justification for allocation of prime agricultural land as paragraph 80 of Scottish Planning Policy does not appear to include this as an essential reason for allocation of this valuable resource.</p> <p>The assessment of the Landscape topic is unclear. Assessment of the Vision is necessarily high level and general; however the assessment of SEA objectives and questions does not appear to have been carried out. The Summary of the assessment states that there are “uncertain long-term local benefits”. We are unclear why the scoring is moderate positive.</p> <p><i>Spatial Strategy</i> Assessment of the Biodiversity, Flora and Fauna topic notes that there is uncertainty due to the high-level nature of this strategic policy. As the assessment should be iterative, a conclusion on effects should be possible based on assessment of the other policies and proposals in the emerging plan.</p> <p><i>The Economic Outlook: Issue 1</i> We disagree with the assessment conclusion that none of the areas identified “sensitive receptors with regards to biodiversity, flora and fauna”. These areas may be less likely to host designated sites but it is not possible to state that no protected species are present. We are concerned that this conclusion may lead to lower adherence to the need for survey at application stage.</p> <p><i>The Space Port: Issue 2</i> We disagree with the assessment conclusion that none of the areas identified “sensitive receptors with regards to biodiversity, flora and fauna”. These areas may be less likely to host designated sites but it is not possible to state that no protected species are present. We are concerned that this conclusion may lead to lower adherence to the need for survey at application stage.</p> <p>We are uncertain that the assessment of “negligible effects” for the Landscape topic is correct. The nature of the potential use could lead to landscape impacts within and outwith the site. We therefore recommend that this topic is assessed as having an uncertain effect.</p> <p><i>The Ayrshire Growth Deal: Issue 3</i></p>	<p>noted. Constructive suggestions for improved/alternative considerations have been acted upon wherever possible.</p> <p>It is pertinent to reiterate and emphasise that the MIR was a transient and consultative document forming an intermediate stage in the formulation of a settled policy expression in the proposed plan. Furthermore, the MIR content consists of high-level and thematic discussion of a selective group of broad issues – this is inherently distinct from the format, exactness and detailed specifics of a comprehensive suite of settled policy statements forming a complete plan. This peculiarity of status and content, and its implications for and recognition within the assessment, is alluded to repeatedly throughout both the textual sections of the Report and the assessment matrices appendix.</p> <p>A fundamental consequence of the distinct nature of the MIR is that PLDP2 comprises a different document in terms of content, format and detail, and this in turn requires replacement assessment to supersede that of the MIR content. It will not therefore add value to further debate/revise isolated aspects of the latter assessment, as any outcomes of so doing will have little if any direct bearing on the PLDP content and assessment.</p> <p>In order to mitigate against disproportionate concentration upon subjective assessment minutiae, and to better relate to and reflect the interconnectedness and complementarity of the PLDP2’s policies, assessment matrices in the final ER are now deployed per LDP chapter, as advocated by PAN 1/2010; enabling stronger and more rounded focus on ‘LSE’.</p>
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		<p>We are uncertain that the Ayrshire Growth Deal should be assessed in and of itself. As an economic measure it will influence the delivery of other Issues and we recommend that the assessment of those Issues should reflect the influence of the Growth Deal. This may be restricted to an assessment of the change in likelihood of particular projects happening within LDP2’s lifetime.</p> <p><i>Employment Land and Rural Enterprise: Issue 4</i> The interim Environmental Report does not assess Option 1 of Issue 4. We assume that this is because this Option maintains the position of LDP1. Our advice is that this Option should be reassessed to support identification of changes in factors influencing topics that may have arisen since the SEA of LDP1. Reassessing this Option would also maintain consistency throughout the Environmental Report as all other Options that maintain LDP1 policy approach have been reassessed.</p> <p><i>A Strategy for Housing Development: Issue 5</i> We agree with the assessment of the preferred approach of Issue 5A. However, a more robust approach to mitigation is required. At present the proposed mitigation is that “Care and prudence in such site selection is especially important” and that “allocations made could be supplemented with site briefs to provide project-level mitigation”. Our advice is that sites should be carefully assessed and that, if a place-based agenda as discussed in the MIR is to be taken to LDP2, site briefs should be prepared as part of the plan. We welcome the assessment in Issue 5B of the contribution of place-making to integrating greenspaces and habitat corridors into development. The benefits of this approach could be made more likely if allocations are accompanied with clear development principles and site briefs in the plan.</p> <p><i>Rural Housing: Issue 6</i> We have no comments on the assessment of this Issue.</p> <p><i>The Central Scotland Green Network: Issue 7</i> In general we agree with the assessment of Issue 7. However, we note that the CSGN Theme of a Place for Growth focuses on “Creating an environment for sustainable economic growth” and not “long term economic growth”.</p> <p><i>Local Landscape Areas: Issue 8</i> The assessment of this Issue refers to the roles identified in our guidance on local landscape designations. We welcome the proposed review but consider that the assessment of this Issue requires review. At present it does not appear to have considered the SEA objectives or questions set out in Table 4-3.</p>	

Appendix A (ii contd.) – Interim ER consultation input – public (2018)

<p>Public comments on IER per 2005 Act, s.16(2)(a)(iii)</p>	<p>Account taken by authority of opinions expressed</p>
<p>Representation references: #0131 #0146 QW-I5b-SfC-MuirL-Row17</p>	<p>A very limited number of representations made during the MIR/IER public consultation period directly cited the IER. It is notable that those few who did all commented almost exclusively in the context of one particular development site suggested for consideration in the MIR. One comment repeats verbatim the wording of part of one other. The critiques offered naturally have a privilege of affording full bias to one particular standpoint in respect of one preferentially selected sub-component of environmental effects, and this of course contrasts to the much wider and broader set of compromises that the ER’s report must make in its assessments; assessing – at a strategically higher and more holistic level than a single-site analysis – across all twelve prescribed SEA topics and reconciling the weight of effects between those topics as appropriate. Notwithstanding this pertinent distinction, the viewpoints expressed are duly acknowledged.</p> <p>The comments portray some misconceptions about the parameters of the SEA process, including for example confusing the relationship between the environmental baseline (ie. as a baseline, it establishes an up-to-date position of environmental conditions <i>prior to plan implementation</i>) and how the provisions of the plan (or MIR, in this case) may affect environmental media. The baseline is by definition a benchmark to establish a position prior to assessing the change that new effects might render.</p> <p>Other misconceptions apparent in the representations largely arose from the peculiarity of the MIR’s nature as a tentative options document, and perceiving the interim ER as an end-point in the SEA process rather than, as its name suggests, an interim assessment confined by the various restrictions and uncertainties that the nature of the MIR entails: to be followed, in turn, by a finalised ER. As the end-point in the SEA process, it is the finalised ER to which the commitments of the DPS pertain.</p> <p>The MIR content was high-level and expressed thematically, to include a housing strategy. The IER assessed that housing strategy on a commensurate basis. Consultation was undertaken on sites suggested without having preconceived which sites may or may not progress to allocation, this is the nature of the MIR stage as a consultative process. Representations prematurely sought site-level assessment within the IER, whereas this is now comprehensively included within the final ER’s methodology through the ‘land assessment framework’ process, per Appendix C (ii).</p> <p>Moreover, the PPS itself (such as the PLDP2 comprises) directly and demonstrably takes account of the strength and consistency of opinion in respect of the subject site suggestion, in that it has ultimately been excluded from the plan’s site allocations.</p>

Appendix A (iii) – Final ER consultation input (2019)

Consultation Authority	Ref.	Consultation Authority Comment	Account taken of opinions expressed
<p>Historic Environment Scotland</p> <p>HES Case ID: 300020243</p> <p>(15 Nov 2019)</p>	<p>Part 2: Final Environmental Report (September 2019)</p>	<p>We have reviewed the Final Environmental Report (September 2019) and broadly agree with the conclusion that, cumulatively, the constituent parts of the Proposed Plan are likely to give rise to positive effects on the cultural heritage topic area.</p>	<p>Noted.</p>
		<p>While we consider that the assessment framework to be appropriate, we note that the environmental assessment included at Chapter 7 and the associated assessment matrices at Appendix C is relatively high level and consider that a more granular level of analysis would have been helpful in this instance. Individual policies and land allocations are not assessed within the main part of the assessment in either Chapter 7 or Appendix C. This makes it difficult to pinpoint where environmental effects are likely to occur.</p>	<p>In order to mitigate against disproportionate concentration upon subjective assessment minutiae, and to better relate to and reflect the interconnectedness and complementarity of the PLDP2’s policies, assessment matrices in the final ER were deployed per LDP chapter, as advocated by PAN 1/2010; enabling stronger and more rounded focus on ‘LSE’ specifically. Land allocations are assessed via the Land Assessment Framework within Appendix C.</p> <p>It is further considered that the nature of LDP2 as a review of – and modest iterative evolution to – an existing and fully SEA’d LDP provides favourable context for the approach taken given the FER content does not exist in isolation of (and need not duplicate) relevant preceding SEA baseline.</p> <p>SAC is keen to work with HES at scoping stage of future SEA for superseding plan/s to explore options for alternative ways of best reconciling the tension between proportionality and granularity of assessment.</p>
		<p>In particular, we note that limited consideration is given to the environmental performance of the Cultural Heritage topic policy. As set out above, we consider that this policy does not provide protection for all of South Ayrshire’s undesignated heritage assets and does not include a presumption in favour of the retention of listed buildings or buildings that make a positive contribution to the character and appearance of a conservation area. Similarly, we note that the assessment of LDP Part 1: The Spatial Strategy does not include an analysis of where individual development allocations may</p>	<p>See comment and rationale above.</p> <p>Moreover, SAC acknowledge and agree the shortcoming identified by HES regards protection of South Ayrshire’s undesignated heritage assets.</p>

		<p>give rise to environmental effects on the Cultural Heritage topic area. As a result of this, it is difficult to predict where cumulative effects may occur as a result of implementing the Spatial Strategy as a whole. Additionally, we note that no mitigation is offered through the environmental assessment to address individual impacts.</p>	<p>This detail is duly rectified and explicitly addressed via reworked policy in MPLDP2.</p>
		<p>We also note that the Development Opportunity Sites included at Appendix E of the Proposed Plan have not been subject to environmental assessment. We would therefore recommend that the ‘Development Opportunities Schedule’ to be published alongside the plan should be subject to environmental assessment. We note that many of these Development Opportunity Sites are located in town centres and consider it essential that site specific mitigation measures are explored through the environmental assessment process to ensure that development is delivered in a way that protects and enhances South Ayrshire’s cultural heritage resources.</p>	<p>Opinion and suggestion noted with thanks.</p> <p>Accordingly, the Development Opportunity Table in its capacity as a speculative passive device is given both specific and granular assessment against all SEA topics via the FER Addendum.</p> <p>However, SAC consider it crucial to avoid conflating said device with the quite distinct status, specificity, nature and purpose of a bona fide plan-led site allocation per se (which the listed development opportunities are not); this context and the discrimination between same is thus alluded to within aforesaid assessment in FER Addendum.</p> <p>Given these reasons/context, SAC consider it is most appropriate that sufficient universal mitigation is assured for SEA purposes by the cross-referencing of applicable LDP policies, whereas the compound assurance of site-level mitigation is best explored on a proposal-specific basis via DM process.</p> <p>SAC is keen to work with HES at scoping stage of future SEA for superseding plan/s to explore options for best frontloading the identification of site-specific provisions / content of the plan besides actual formal allocations; and cooperatively reconciling for same the limit of scope between the SEA process and DM procedure respectively, especially viz mitigation.</p>
<p>SEPA Ref: PCS/167832 SEA01219/ER (7 Nov 2019)</p>	<p>Appendix 1: Comments on the Environmental Report Purpose of SEA</p>	<p>SEA should contribute to enhanced transparency enabling the public to better understand the effect of a plan on the environment and how environmental issues have been considered in the development of the plan. Contrary to ER paragraph 7.2.5 SEA does not require environmental protection and enhancement to be the primary end for all plans. Rather, SEA is a valuable opportunity to help those responsible for a plan to achieve better environmental outcomes while still delivering the objectives of the plan.</p>	<p>Opinion and interpretation of SEA purpose is noted. SAC was not dictating an absolute requirement for SEA here, but proposing an aspirational context and direction for an ideal SEA outcome. Such commentary may be omitted from future ER narrative if found unhelpful.</p>

	Purpose of SEA	In terms of contributing to transparency and understanding the ER is written using language and terminology which is frequently impenetrable, repetitious, and often confusing. As such it could be argued that the ER does not aid the understanding of key environmental issues associated with the plan to the extent which it could have done had it been presented in more simple language.	<p>SAC note and regret the negative generalised characterisation of the ER content. The ER is largely reflective of the method and format previously used in the 2014 SALDP and the 2017 TCRLDP and which SEPA did not criticise in the same manner. SAC further note that no member of public complained about the accessibility of the ER content.</p> <p>With limited resources it is difficult to reconcile simplification of an essentially technical discipline whilst maintaining both statutory compliance and sufficient assessment detail, without relying heavily upon constructive help from expert stakeholders whose own resources are also limited.</p> <p>The Scottish Government offers very little in terms of active capacity-raising to modernise and rationalise SEA, and showcase and exchange best practice. eg. Their SEA guidance has not been updated in a decade and the former National SEA Forum appears moribund.</p>
	Purpose of SEA	Overall it is disappointing to note (section 5.3) that the SEA was only felt to have a limited influence on the plan and we would welcome working with you in future to explore how a different approach to the SEA could make a more positive contribution to the plan and the public’s understanding of the environmental issues associated with it.	SAC note the observation and are grateful for SEPA’s invitation to explore alternative approaches in the future. SAC would like to open this dialogue in the course of the SEA scoping stage for a succeeding plan.
	Influencing the PLDP2	Scottish Government SEA guidance promotes a proportionate approach to SEA. Paragraph 5.3.1 of the ER states that “The SEA has had a limited influence over the content of PLDP2” largely because PLDP2 is “an evolution” of the original plan. For clarification, SEPA supports of a proportionate approach and we would expect an assessment such as this to build on the previous assessments and associated monitoring findings and not start from scratch.	SAC are grateful that SEPA have acknowledged our explanation for the pragmatic findings regards the SEA’s influence with which they had noted disappointment above.
	Considering the carried-forward policy context	We highlighted in our scoping response that it is necessary to assess the new or amended elements of a plan within the context of the full range of development strategies, policies, and land use allocations (including those carried forward). Paragraph 5.1.3 seeks to explain the approach taken to this aspect of the assessment but is quite difficult to understand – for example references to rejection of mitigation measures are quite misleading. If the carried-forward policy context already establishes mitigation for potential negative effects then this should have been factored into the assessment rather than new mitigation proposed and then dismissed in a completely extraneous exercise. Such an approach would have negated the need to then go on to justify the rejection of mitigation measures (paragraph 5.1.4)	<p>SAC note SEPA’s commentary regards understanding the approach taken. It is noted that other consultation authorities did not raise concerns over this methodological component ie. considering carry-forward policy content.</p> <p>Clearly the approach taken was not intended nor felt to be extraneous and this characterisation is regrettable. SAC thus considers the issue raised to be one of interpretation and expression / approach</p>

		as it could have simply been scored as it would perform in the context of the plan (i.e. within the context of the assumed mitigation provided by the carried-forward policy context).	technique, rather than substantive methodological flaw. Notwithstanding this, at future SEA scoping stage SAC will seek SEPA's advice on how carried-forward policy context can be factored into the assessment in an explicit and cogent way without bloating the assessment commentary with contextual narrative.
	Terminology	Paragraph 4.4.1 introduces the term "weighting" – it is unclear whether this simply refers to a score (i.e. + or -) or whether some actual weight has been applied to topics or scores for some reason. The use of this term through the ER is confusing e.g. paragraph 7.3.2 which deals with mitigation measures.	Thank you for highlighting this ambiguity. SAC will take future care to avert reference to 'weighting' when the discussion in fact relates to scoring procedures.
	Methodology / level of detail	<p>Overall the method of assessing and assigning a score for complete chapters rather than individual policies means that the analysis is quite clumsy and therefore lacking in terms of usefulness in improving the policies within the plan or identifying mitigation measures which may lie outwith the plan itself. Given the varied sets of issues and policies contained in each chapter attributing an overall score for each chapter is quite also misleading.</p> <p>The single-score per chapter approach is particularly fraught with difficulty when trying to draw overall conclusions. Paragraph 9.1.4 which refers to "an aggregated compromise view of overall adverse effects" seems to support this – implying as it does that the act of trying to combine all aspects of a chapter into one score does not provide the nuanced output required by policy makers if they are to be able to understand and address environmental issues within the context of their plan.</p>	<p>Feedback and perspective is noted. SAC is of the opinion that scoring individual policies is itself an extraneous exercise because in no real-world proper application of the development plan would a single policy be deployed in total isolation.</p> <p>The feedback implies there is nil regard to individual policy and has not acknowledged that the assessment commentary throughout in fact widely cites individual policies in informing and constructing the written evaluation.</p> <p>SAC does not agree that 'overall' scores for chapters are misleading given the above insofar as the LDP is to be read and applied as a whole, and given that the SEA is correspondingly driving towards an outcome of identifying the likely significant effects of the implementing the plan entire.</p> <p>Critique of para 9.1.4 is felt unfair as it has been taken out of context: the phrase is not felt inappropriate given that the cited paragraph is within the Conclusion chapter of the ER. It neither comprises nor replaces the finer assessments which fed into it.</p> <p>The assessment duly elucidates that the LDP as a whole document is, unsurprisingly, largely self-mitigating with regards to the majority of overt environmental effects capable of being considered significant.</p>

	Methodology / level of detail	A more usable approach (one able to better influence the plan and at the same time be more transparent) would have been to assess the effects of each policy (or group of closely related policies) against each SEA topic. The conclusion of this would be an individual score against each topic for each policy. This approach would enable opportunities for improving the environmental performance of each policy to be clearly identified. The chapter summary commentaries which have been provided in Appendix C of the ER would then have been more appropriate. As it stands, the report of the assessment is lacking in the detail.	SAC is grateful for this constructive suggestion and considers this could form a basis for exploring and informing methodology options-appraisal in a future SEA scoping stage.
	Methodology / level of detail	Section 7 of the ER would also benefit from inclusion of more detailed discussion of issues, especially in regard to negative effects and mitigation e.g. paragraph 7.2.10 (economic development). The discussion identifies a “trade-off” with regards adverse environmental effects (noise, climate and air quality) – reference to potential mitigation would be helpful here e.g. developer requirements, master-planning (e.g. to address vacant and derelict land issues), influencing other policy areas which support economic development outwith the LDP (e.g. local transport or tourism strategy) not only to address the adverse effects but also to ensure that opportunities to deliver “greener” economic development are identified and capitalised on.	SAC notes the example provided and considers that the relevant discussion in regard to negative effects and mitigation is covered in the detailed desired further on in the chapter via Table 7-1: Mitigation and recommendations. SAC is content that the mitigation identified was both appropriate and sufficient in the context of the environmental performance of the plan when implemented and applied as a whole. Nevertheless SAC is grateful for the constructive suggestions for more creative, outward-looking mitigation possibilities and will give thought as to how a future SEA may recommend and incorporate these if/where necessary via appropriate and deliverable mechanisms (ie. LDP Action Programme, supplementary guidance).
	Methodology / level of detail	It would also be useful for Section 7 to draw more on the information set out in Section 3 (environmental baseline). For example, paragraph 7.2.15 (environment and climate change) has no mention of impacts on the water environment despite this being identified as a key issue in the baseline (paragraphs 3.2.12 to 3.2.16). The baseline discussion identifies water quality issues including sewage disposal affecting the quality of watercourses and coastal waters. Given the dual role of a local development plan in allocating land for development and establishing the policies which underpin the delivery of such development we would expect the SEA to consider the potential impact of the plan on water quality issues either under the water environment policy or the infrastructure policy.	Feedback is noted. Chapter 7 provides a textual assessment overview which is intended to draw together and focus on the likely significant effects on the environment of the respective plan components, and it is intended to be read in conjunction with the detailed assessment material set out within the assessment matrices forming Appendix C (i); as provides, for example, analysis against the scoped SEA topic of Water specifically.
	Appendix C(ii) Land Assessment Framework	We note that we were asked for our comments regarding the site selection for sites in parts a & b of this appendix. We are disappointed that our response and comments on these sites were not taken into account and are not reflected in the table. Sites where we have indicated the requirement for an FRA have not had this noted (5, 12, 14, 16, 31, 37, 54, 59, MIR-TRY, MIR-DAL and MIR-BOG). Additionally, contaminated land issues relating to radioactive substances at sites that historically were associated with airfields and aircraft maintenance in both World Wars have not been taken into account.	Thank you for highlighting this oversight within the Land Assessment Framework’s format / structure. The site-specific requirements you have raised consequent to consultation are taken into account and identified (relative to those sites ultimately allocated) within both LDP2 Appendix D and the Supplementary Guidance: Housing Site Design Briefs which are the

		We also note that we were not asked for updated comments on sites in part c of this appendix despite changes in legislation and available information (ie updated flood maps).	respective components of the plan liable to set out such site-level details. However, future iteration of the LAF could be improved in line with your feedback to encapsulate and represent the mitigation identified.
Scottish Natural Heritage Ref: CEA156942 / A3082413 (13 Nov 2019)	General comments	The summary of the environmental assessment findings on page 6 of the Environmental Report notes that while the realisation of effects is uncertain, the overall effect will be positive due to compliance with Scottish Planning Policy (SPP) and the balanced approach taken in LDP2. As this is a review of LDP1, with relatively few significant changes to policy or proposals, the overall assessment is a reasonable conclusion on the effects of the plan.	Noted with thanks.
	Annex Table 4-1, page 17 Landscape SEA Topic	The key baseline implications for the Landscape SEA topic include reference to Natura 2000 sites, SSSIs and local wildlife sites. While these sites will play a role in landscape quality in South Ayrshire they are not designated for landscape qualities. For monitoring of LDP2, we suggest that this baseline is either amended or that the role of sites not designated for landscape qualities in making an overall contribution to landscape quality is explained. Relevant landscape related designations in South Ayrshire would be the Merrick Wild Land Area and the Local Landscape Areas.	This useful corrective distinction is noted with thanks. This will be duly picked up and incorporated within the review and update of the environmental baseline at such time as such work is necessary in preparing groundwork for future SEAs.
	Section 4.5, page 23 Land Assessment Framework	We welcome the continued use of the Land Assessment Framework (LAF) and its role in providing comparability and continuity between LDP1 and LDP2. We expect that this will be a useful addition in longer-term monitoring of the effects of the plans, particularly where sites are rolled forward from one plan to another.	Noted with thanks. SAC was likewise motivated to assure ease of future comparison across chronological series of development plans eg. important for monitoring, as well as such consistency providing transparency and legibility for third parties.
	Section 6.1, page 29 Habitats Regulations Appraisal	Section 6.1 of the Environmental Report provides a useful summary and link to the findings of the Habitats Regulations Appraisal (HRA) Record. We have provided advice on the HRA Record in our response to the Proposed Plan consultation.	Noted with thanks.
	Table 10.1 Pages 41 – 43	In general, we agree with the monitoring strategy. However, we have comments about the following actions: <u>Use of SNH consultation comments in monitoring impacts on Biodiversity, Flora and Fauna</u> – we have recently revisited how we provide advice on Development Management casework and have created Species Planning Advice1 notes that should be treated as standing advice. It may be useful to review the data source to include these sheets rather than rely on our consultation comments as we	Thank you for this useful contextual update. SAC will explore how the monitoring strategy can be adapted during the lifetime of the plan to take cognisance of the scale-back of NatureScot consultation input, and in order that the planning authority takes on a more proactive and greater

		<p>expect to engage less frequently on straightforward protected species issues. We also suggest that as any responses from us will not form a complete picture of the effect of development proposals permitted it may be useful to review permissions granted in terms of maps and descriptions of their natural heritage designations and interests. Overlying this information with extent of development sites would provide a clear record of extent lost.</p> <p>1 https://www.nature.scot/professional-advice/planning-and-development/advice-planners-and-developers/planning-and-development-protected-animals</p> <p><u>Use of SNH consultation comments in monitoring impacts on Landscape</u> – we have recently reviewed our provision of landscape advice and will prioritise cases affecting designated sites (e.g. National Scenic Areas), inputting to development plan preparation, cases affecting wild land and cases raising issues of national interest in the wider countryside. It is therefore likely that our consultation comments will be reduced from previous levels, forming a less robust data source and baseline for monitoring of cases where the above criteria do not apply. This may, however, be acceptable if the monitoring scheme clearly sets out the context.</p>	ownership of monitoring via its own Development Management activity.
	Appendix C(i) – Assessment Matrix	We agree with those parts of the assessment relevant to our remit.	Noted with thanks.
	Appendix D – Cumulative effects assessment	We agree with those parts of the assessment relevant to our remit.	Noted with thanks.

Appendix A (iv) – Environmental Report Addendum consultation input (2020)

Consultation Authority	Ref.	Consultation Authority Comment	Account taken of opinions expressed
<p>Historic Environment Scotland</p> <p>HES Case ID: 300020243</p> <p>(14 Aug 2020)</p>	<p>Part 2: Environmental Report Addendum (March 2020)</p>	<p>We have reviewed the Environmental Report Addendum (March 2020) and broadly agree with the conclusion presented that the fine grain modifications within the Modified Proposed Plan are unlikely to give rise to significant adverse effects additional to those predicted in the Environmental Report (September 2019). We do, however, consider that some beneficial effects on the historic environment may occur following the revision if the historic environment topic policy to include provision for South Ayrshire’s non-designated heritage assets. We therefore disagree with the decision to screen this modification out from more detailed assessment within the Environmental Report Addendum (March 2020). We also note potential for uncertain environmental effects caused by the modification to Strategic Policy 2 to permit development which is not overtly plan-led.</p>	<p>Noted with thanks. SAC acknowledge the difference in opinion over the ER Addendum’s screening outcome relative to the historic environment policy modifications.</p> <p>SAC propose that in any future instance of a similar screening / filtering stage of assessment, we would contact HES and invite an informal view prior to screening out a cultural heritage element.</p>
<p>SEPA</p> <p>Ref: PCS/172062 SEA/01219/ER</p> <p>(13 Aug 2020)</p>	<p>Appendix 1: Comments on the Environmental Report</p>	<p>In general we agree that the modifications to the Local Development Plan are unlikely to lead to environmental effects that are markedly different from those already assessed. However, the addition of Policies that were not in the original LDP may be an exception to this.</p> <p>Table 1 provides a clear review of the changes that have been made to the LDP.</p> <p>Tables 2 & 3 provide an easily understood summary of the changes and what has been screened in and out. We agree with the reasoning and the assessment shown in these tables.</p> <p>We agree with the assessment shown in Appendix Add B.</p>	<p>Noted with thanks.</p>
<p>SNH</p> <p>Ref: CEA159762 / A3269521</p> <p>(13 Aug 2020)</p>	<p>Annex Environmental Report Paragraph 5.1</p>	<p>We agree that the modified Local Development Plan (LDP) is unlikely to lead to environmental effects that differ from those already assessed.</p>	<p>Noted with thanks.</p>
	<p>Table 1</p>	<p>The first tier screening of the modified LDP presented in Table 1 is very clear, showing changes in a way that is easy to follow. We welcome this approach.</p>	<p>Noted with thanks.</p>
	<p>Table 2 and Table 3</p>	<p>The modification typology matrix provides a useful overview of modifications and whether they are screened in or out. We welcome this approach and consider that it represents good practice in presenting the assessment in a clear, accessible manner. The second tier screening in Table 3 is therefore very easy to understand. We agree with the summary assessment presented here.</p>	<p>Noted with thanks.</p>

	Paragraph 5.9.	<p>We note that there is no mitigation proposed as part of the addendum to the Environmental Report. Paragraph 5.9 explains that this is due to embedded mitigation within the modifications alongside the assessment that there is no fundamental change to earlier assessment findings. We agree with this position.</p>	Noted with thanks.
		<p>We agree with the assessment of the modification of Core Principle C1.</p> <p>We agree that the introduction of development that is not overtly plan-led, as may now happen via Strategic Policy 2, could lead to uncertain effects depending on location of development.</p> <p>Assessment of the modification to the Open Space policy identifies a neutral effect on the Biodiversity topic. As the modification includes promoting appropriately sited community growing / allotments, we consider that the assessment could be more positive in terms of effects on biodiversity. Similarly, we would expect positive impacts on Landscape due to the general nature of community growing / allotments.</p>	<p>Noted with thanks.</p> <p>SAC appreciate highlighting the oversight in consciously recording the potential positive effects arising from community growing and allotments relative to Biodiversity and Landscape topics.</p> <p>Explicit reference to positive potential can be woven into subsequent environmental assessment, especially where LDP monitoring identifies the corresponding policy provision facilitated associated development.</p>

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本信息可应要求提供盲文，大字印刷或音频格式，以及可翻译成多种语言。以下是详细联系方式。

本信息可慮應要求提供盲文，大字印刷或音频格式，以及可翻譯成多种語言。以下是詳細聯系方式。

ਇਹ ਜਾਣਕਾਰੀ ਮੰਗ ਕੇ ਬੋਲ, ਵੱਡੇ ਅੱਖਰਾਂ ਅਤੇ ਸਣਨ ਵਾਲੇ ਰਪ ਵਿਚ ਵੀ ਲਈ ਜਾ ਸਕਦੀ ਹੈ, ਅਤੇ ਇਹਦਾ ਤਰਜਮਾ ਹੋਰ ਬੋਲੀਆਂ ਵਿਚ ਵੀ ਕਰਵਾਇਆ ਜਾ ਸਕਦਾ ਹੈ। ਸੰਪਰਕ ਕਰਨ ਲਈ ਜਾਣਕਾਰੀ ਹੇਠਾਂ ਦਿੱਤੀ ਗਈ ਹੈ।

Niniejsze informacje mogą zostać udostępnione na życzenie, w alfabecie Braille'a, w druku powiększonym lub w formie audio oraz mogą zostać przetłumaczone na wiele języków obcych. Dane kontaktowe znajdują się poniżej.

Faodar am fiosrachadh seo fhaighinn, le iarrtas, ann am braille, clò mòr no clàr fuaim agus tha e comasach eadar-theangachadh gu grunn chànanan. Tha fiosrachadh gu h-ìosal mu bhith a' cur fios a-steach.