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## NORTH AYRSHIRE COUNCIL

8 September 2020

### Cabinet

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**Title:** **Millport Coastal Flood Protection Scheme: Preliminary Scheme Confirmation**

**Purpose:** To update Cabinet on the formal Scheme Notification consultation, objections received, and proposed next steps.

**Recommendation:** It is proposed that Cabinet: -

- a) considers the objections received during the formal Scheme Notification stage as detailed within Appendix 1; and
- b) makes a preliminary decision to confirm the proposed Millport Coastal Flood Protection Scheme without modification.

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### 1. Executive Summary

- 1.1 The requirement for a coastal flood protection scheme for Millport was included within the Ayrshire Local Flood Risk Management Strategy and Plan produced in 2015 and 2016 respectively. Since then work has been progressing to develop an acceptable design solution for the flood protection scheme.
- 1.2 Three design solutions were presented to Cabinet in December 2018. The preferred solution was the provision of offshore breakwaters connecting the small islands in Millport Bay, plus onshore flood walls along the Millport shoreline as shown in the diagram at paragraph 2.1. The preferred option will not only provide the required flood protection, but it will also create an area of sheltered water which could allow the future development of a community marina supporting the potential for step ashore facilities under the auspices of the Ayrshire Growth Deal.
- 1.3 To date, four non-statutory community consultation events have been held with stakeholders. In addition, targeted community consultation was carried out in July 2019 for the Clyde Street, Cross House and Crichton Street residents. A forum was also established involving stakeholders, elected members and officers to discuss issues relating to the impact of the proposed flood protection scheme. This has afforded opportunities for extensive consideration of the views of the local community and reflection of these views within the design.
- 1.4 On 26 November 2019 Cabinet agreed that the outline design be finalised and that officers submit the Scheme Notification to Scottish Government to allow statutory public consultation on the proposals to take place in early 2020.

This map illustrates the proposed Millport Harbour Bridge, a long, low-profile structure spanning Millport Bay. The bridge is shown in a light blue color, with its approach roads highlighted in red. The map includes various geographical features such as Millport Bay, Millport Harbour, and the surrounding land. Key locations marked on the map include Millport, Millport Bay, Millport Harbour, and the surrounding land. The map also shows the proposed bridge structure, which is a long, low-profile bridge spanning the bay. The map includes a scale bar indicating distances up to 400 metres and a north arrow. The map is titled 'Map of Millport Bay' and is part of a larger project to build a bridge across the bay.

- 2.2 A non-statutory community consultation event was held in Millport in February 2019 followed by further targeted consultation with the Clyde Street, Cross House and Crichton Street residents. Further comments and queries were addressed with another non-statutory community consultation event in August 2019, which showed strong community support for the scheme.
- 2.3 This feedback was reported to the Cabinet on 26 November 2019 and it was agreed that the outline design be finalised and that officers submit the Scheme Notification to Scottish Government to allow statutory public consultation on the proposals.
- 2.4 The Scheme Notification was submitted to Scottish Government on the 6 March 2020 and a 28-day statutory public consultation on the proposals started as planned. Following the COVID-19 outbreak it was agreed to extend the consultation to allow both the public and statutory bodies additional time to consider and respond to the scheme proposal. The statutory consultation closed on 11 May 2020.
- 2.5 It is further evidence of the strong community support for the preferred option that only five objections were received, none of which were from residents owning properties or living in the flood risk area. The contents of the five objections received are provided at Appendix 1, but can be summarised as follows:
- changing the navigation channel which affects the ability of larger vessels to moor in Millport and the related economic loss;
  - questioning whether the scheme provide value for money;
  - lack of Council funded amenities available in the island; and
  - a desire to have Millport Pier restored.

One of the objections received was from the P.S. Waverley. It is acknowledged that the Waverley historically moored at the timber pier but has not done so since 2014 as the condition of the timber pier does not allow it. Instead, the Waverley used Keppel Pier, just north of Millport. The timber pier refurbishment is not part of the Flood Protection Scheme, but the proposed breakwater and changing navigational channel would prevent this vessel from using the pier even if the pier was returned to good working order.

- 2.6 All of these issues were dealt with during the four non-statutory consultations held prior to the scheme notification stage and the following summarises the position reached:
- Whilst there is an impact on larger vessels from closing off the current navigational channel, it unlocks the opportunity for the local community to develop a marina proposal at a future date. The Waverly can continue to dock at Keppel Pier;
  - With regard to the value for money of the scheme, the estimate of the benefits provided by the scheme outweigh the cost by a ratio of 2.37 as reported to Cabinet in November 2019, and the value for money of the scheme has been separately assessed by the Scottish Government;
  - The investment for flood protection is funded 80/20 by the Scottish Government/ North Ayrshire Council respectively. The Scottish Government confirmed that they would only fund investment relating to flood protection. Other investment in the island is outwith the scope of the flood protection scheme so this point is not a relevant objection to the scheme;

- Cabinet made a decision not to invest in Millport timber pier in 2014 and the option remains for community asset transfer and subsequent refurbishment of the pier.
- 2.7 Despite the further detailed responses to the objections provided by officers, in an effort to resolve the objections (see Appendix 1), two of the objectors confirmed they wish to continue their objections. No responses were received from the other three, however legislation requires that they are still considered.
- 2.8 None of the objections have raised any new points which have not been considered and responded to as part of our extensive prior consultation efforts. It is therefore considered that no modification should be made to the scheme and it is recommended that Cabinet makes a preliminary decision to confirm the scheme in terms of the Paragraph 5 of Schedule 2 of the Flood Risk Management (Scotland) Act 2009. The objections summarised above and set out in detail at Appendix 1 must be considered prior to making that decision and thereafter notice of that decision must be made to the objectors.
- 2.9 As there have been no objections from any statutory consultee, or anyone directly affected by flooding or upon whose ground the works will be undertaken, there is no requirement under the legislation to notify the Scottish Ministers nor hold a public local inquiry or public hearing prior to the preliminary confirmation.
- 2.10 Following preliminary notification the objectors will be notified of the decision and will have a further opportunity to consider their objections. The intention is to come back to Cabinet in November 2020 to seek final confirmation of the scheme which will allow the Council to seek deemed planning permission. After final confirmation the design details will be finalised and the necessary licences will be applied for, which will be followed by a tender process leading to construction work on site.
- 2.11 An indicative timescale for the next phases of the project, subject to Cabinet approval to proceed to the preliminary confirmation stage, is detailed below. The key milestones remain broadly in-line with the November 2019 Cabinet Report:
- September 2020 - preliminary decision
  - November 2020 Cabinet to make final decision following preliminary decision and approve that the detailed design be progressed
  - Late 2020 to autumn 2021 - Detailed design undertaken
  - Late 2021 – Contractor procurement, Marine Licence application
  - Early 2022 - Construction commences
  - Late 2023 - Scheme completed and operational

### **3. Proposals**

- 3.1 That Cabinet considers the outstanding objections, summarised at paragraphs 2.5 and 2.6 and detailed in full at Appendix 1, and agrees to make a preliminary decision to confirm the proposed Scheme without modification, which will trigger the notification to the objectors of the decision. As there are no objections from those with an interest in the land affected by flooding; or land affected by the works; or statutory consultees, there is no need to refer the matter to Scottish Ministers following the decision.
- 3.2 That Cabinet notes the indicative project timescale as detailed in paragraph 2.11.



## **4. Implications/Socio-economic Duty**

### **Financial**

- 4.1 The costs associated with the delivery of the proposed Millport Coastal Flood Protection Scheme are estimated at £27.5m and will attract 80% funding from Scottish Government with the remaining 20% funding being the responsibility of the local authority. The required funding is allocated in NAC's approved Capital Investment Plan.

There is no financial allocation to secure the local community's aspirations to retain the existing timber pier structure, which will only be possible should the community be able to secure funds.

### **Human Resources**

- 4.2 None.

### **Legal**

- 4.3 The objectors must be notified of the preliminary decision in terms of Paragraph 5(3) of Schedule 2 of the Flood Risk Management (Scotland) Act 2009 following which they may withdraw or affirm their objections. As there are no objections from those with an interest in the land affected by flooding, or land affected by the works, or from any statutory consultees, there is no requirement to refer the matter to Scottish Ministers following the preliminary decision. In addition, no objectors have raised any issues not already considered and responded to during the previous consultation stages. It is therefore anticipated that, following notification to the objectors of the preliminary decision, that a recommendation will be brought back to Cabinet later this year to proceed to final confirmation of the scheme.

### **Equality/Socio-economic**

- 4.4 An Equality Rights Impact Assessment will be carried out during the detailed design stage of the project.

### **Environmental and Sustainability**

- 4.5 The flood protection scheme will protect the environment and fabric of Millport against flooding in the long term. An Environmental Statement was submitted with the FPS notification, with reference to the FRM Act and the Environmental Impact Assessment (Scotland) Regulations 2017. If required, an updated EIA would accompany the application for the Marine Licence which will be required for the scheme.

### **Key Priorities**

- 4.6 The flood protection scheme will protect the safety of residents and property in the affected areas and will also help develop the economy of Millport which aligns to the Council Plan 2019 – 2024. The scheme will contribute to keeping people and

communities safe, make Millport a vibrant, welcoming and attractive place and create a sustainable environment.

### **Community Wealth Building**

- 4.7 A package of community wealth building measures will be incorporated into the construction project and this will be considered further at the tender preparation stage.

### **5. Consultation**

- 5.1 To date, four informal community consultation events have been held with stakeholders, including the event which took place on 19 and 20 August 2019. The consultation events have significantly influenced the development of the proposed flood protection scheme.
- 5.2 In addition to the above, targeted community consultation was carried out in July 2019 for the Clyde Street, Cross House and Crichton Street residents.
- 5.3 A forum was established involving stakeholders, elected members and officers to discuss issues relating to the impact of the proposed flood protection scheme. This has afforded the opportunity to consider the views of the local community and this is reflected within the design proposals.

RUSSELL McCUTCHEON  
Executive Director (Place)

For further information please contact **David Hammond , Interim Head of Commercial Services**, on **01294 324570**.

### **Background Papers**

Appendix 1 - Objection responses

## Appendix 1 – Millport Coastal FPS - Objection Responses

COMMERCIAL SERVICES  
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North Ayrshire Council  
Comhairle Siorrachd Àir a Tuath

Your Ref: [redacted] Our Ref: MCFPS/2020/015

If telephoning please call: [redacted]

29 May 2020

Objector No1 –  
1st correspondence

### Millport Coastal FPS - Response to objection from [redacted]

Thank you for your correspondence regarding the Millport Coastal Flood Protection Scheme (FPS), I can confirm that your formal objection letter dated 1st April 2020 has been received. I address the points you made in your objection letter and I ask you to consider my response.

#### The first point regarding the cost of the breakwaters as follows:

*"My overriding concern is the proportion of the overall costs that are required to achieve a certain aspect of the scheme, and the debatable cost benefit that is potentially being incurred.*

*Using the figures presented some months ago by Royal Haskoning DHV, the proposed offshore breakwater accounts for nearly 60% of the total scheme costs (i.e. £15.1m of the total £25.6m). If we consider the proposed breakwater to be in two sections, one between the Leug and the Spoig, and one between the Spoig and the Outer Eileann, the section of breakwater between the Spoig and the Outer Eileann which will (unnecessarily) close-off the main navigable channel into the pier accounts for close to 40% of the total 'scheme costs (i.e. £10.8m of the total £25.6m). By their own figures, this additional section of breakwater between the Spoig and the Outer Eileann will only further mitigate the predicted overtopping wave height at Stuart Street by 0.4m (i.e. 15 inches), over that which would be achieved by a breakwater between the Leug and the Spoig. As these figures are based on a (rolling) 1-in-200 year storm scenario, that is a considerable gamble with £10.8m of taxpayer's money to achieve a mere 15 inch improvement. I'm certain that the same protection could be afforded to Stuart Street, by a slight increase in the Height of the proposed sea wall at a fraction of the cost."*

The current cost estimate for the proposed scheme has been updated from the values provided in the 2018 Scheme Recommendation Report and consultation event display materials which are quoted by [redacted]. Further work to develop the outline design has included a review of the alignment, foundation level and height of the structures. Offshore geotechnical investigations have changed the cost estimate and improved our understanding of design requirements and expected costs. To clarify based on the updated cost estimate, the total initial capital cost for the scheme stated in the Description of Operations for the notified Flood Protection Scheme is £25.4 million. The current cost estimate for the offshore breakwaters is £11.5 million, i.e. 45% of the total initial capital cost. The cost of the section of breakwater between the Leug and the Spoig is £8.3 million, or 33% of the total cost.



## Appendix 1 – Millport Coastal FPS - Objection Responses

### Protection provided by the breakwater between the Spoig and the Outer Eilean

We have reviewed the results of the wave modelling against the values that you have stated. These results show that without the offshore breakwater wave heights are between 1.0m and 1.6m at the Stuart Street sea wall for a 1 in 200-year return period event. With a breakwater between the Leug, the Spoig and the Outer Eilean, wave heights at the wall are reduced to 0.8m. The wave overtopping analysis is based on the wave height about 200m from the sea wall – for this distance offshore the breakwater reduces the wave height from 2.0m to 0.8m.

The expected performance of the offshore breakwater is assessed based on the reduction in wave overtopping (and associated flood risk) that results from this reduction in nearshore wave height. Overtopping rate depends on water level as well as wave height and the structural form of the coast protection structure. The offshore breakwater reduces the average overtopping rate along the length of the Stuart Street sea wall from 16 l/s/m to 1 l/s/m.

Alternative solutions for protection of properties on Stuart Street were considered by the 2015 Options Appraisal and reviewed as part of the development of the Scheme Recommendation Report.

**Increasing the height of the Stuart Street sea wall** was considered as an option to reduce overtopping rates in this area. Numerical modelling undertaken in 2015, and reviewed for the Scheme Recommendation Report, determined that the sea wall would need to be raised by up to 0.7m to reduce overtopping to safe levels for a 1 in 200 year return period storm, or by up to 1.0m to achieve the same standard of protection as the offshore breakwater. This would exceed the maximum wall height of 1.2m which was set as a design criterion for the scheme, based on feedback from the community, to minimise visual impact – the existing crest wall to Stuart Street is 1m high (above pavement level). With this option, whilst pavement levels adjacent to the wall could be raised to allow a view out to sea, but the outlook from the properties on Stuart Street would be significantly altered.

Another alternative considered was a rock armour revetment, about 4m high and 15-20m wide in front of the Stuart Street sea wall. This would protect the wall from direct wave attack and reduce the volume of overtopping. However, a rock revetment alone would not fully address overtopping risks to Stuart Street, and the sea wall would also need to be raised by up to 0.5m – a revetment provides limited additional benefit when compared to raising the sea wall, at significant additional cost. As well as the visual impact of the increased wall height, the appearance of the rock armour revetment itself would have a direct visual impact on the Millport seafront.

These alternative options were not taken forward because of the visual impact for residents and visitors, and the related impacts on tourism and the local economy, were considered to be unacceptable.

### The second point regarding the marina development as follows:

*"Latterly, there has also been considerable discussion around the possibility of a Marina forming part of a potential later development (as a result of the lee that would be created by the proposed offshore breakwater), and to an extent it appears that this may have influenced some of the thinking behind the final proposed solution for the offshore breakwater. This aspect was heavily promoted at the later consultation displays on the island, and erroneously represented what would be possible at the pier.*

*There was even a representation of PS Waverley at the pier, which led people to believe that the pier would still be able to function as a traditional pier (a key factor in a number of people's minds), and this was a completely false representation given the navigational constraints that would be imposed by the proposed breakwater, let alone any potential marina development."*



## Appendix 1 – Millport Coastal FPS - Objection Responses

*"There have been a number of studies that appear to support the economic benefits of a Marina Development, however there is no funding in place for this, and none of the aesthetic downsides appear to have been considered."*

The Environmental Statement and the Scheme Recommendation Report acknowledge that there is the potential for a marina to be constructed in the future in the sheltered area that would be created due to the construction of an offshore breakwater. The potential economic benefits that might be associated with a marina are not included in the economic justification for the flood protection scheme, because the development of a marina does not form part of the proposed scheme, and this statement was made in the February 2019 Consultation report. The Scheme Recommendation Report and the Environmental Statement recognised (qualitatively) the potential future socio-economic benefits that could be associated with a marina. The Environmental Statement does not assess the potential environmental impacts associated with a marina development, because this does not form part of the current proposed scheme.

A plan drawing showing the Waverley at Millport Pier was included in the display materials produced by the NAC Tourism and Coastal Economy team for the February 2019 consultation event. The Flooding team was not able to review these materials prior to the consultation event. The drawing showing the Waverley was recognised as potentially misleading, and during the consultation event the Flood Protection Scheme project team used best efforts to clarify this issue. There has subsequently been clear communication, during meetings with the Millport Harbour Users Group and in the Environmental Statement, that Millport Pier will no longer be accessible to the P.S. Waverley.

The third point regarding the breakwater between the Leug and Spoig as follows:

*"The next option saw the introduction of an offshore breakwater between the Leug and the Spoig, which at the time, appeared to meet all of the stated criteria, and whilst it increased the total cost of the scheme, (from approx.: £12M to approx. £15M), it was nowhere near the costs that are now being proposed (£25.5M). As I've already stated this does nothing more than mitigate potential overtopping at Stuart Street by a mere 15 inches, at the cost of an additional £10.8M?"*

An offshore breakwater between only the Leug and the Spoig has not been assessed, nor presented during public consultation, as a viable option for providing flood protection to Millport. This would not provide sufficient protection to Millport seafront against waves from south to south easterly directions.

You may be referring to the option that was presented at the March 2017 consultation which included a breakwater between the Leug and the Spoig plus two offshore breakwater arms extending from the Spoig and from the Outer Eilean. This option would enable vessels to continue to navigate between the Spoig and the Eileans, but the navigation channel width would be reduced to about 40m, compared to an existing channel width of >100m. The navigation route between the breakwaters would be changed from the existing leading line.

With a gap in the breakwater, the wave height inshore is not reduced as much. The wave height at the Stuart Street Sea wall would be between 1.0m and 1.2m, compared to 0.8m with the continuous breakwater. Therefore, the residual risk of flooding to Stuart Street is greater than for the proposed breakwater. For Glasgow Street, inshore wave heights and associated wave overtopping is higher with this option when compared to the proposed scheme, requiring higher onshore flood walls.



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The costs associated with this breakwater option are equivalent to the estimated costs for the proposed breakwater between the Leug and the Outer Eilean. Although the length of the breakwater arms is less than for the continuous breakwaters, the separate breakwater arms would need to be constructed in deeper water. Costs for onshore works to Glasgow Street would be slightly higher due to the higher flood walls.

This option was rejected by NAC due to the lower standard of protection provided to Stuart Street and Glasgow Street, and the potential safety risks associated with the reduction in navigation channel width.

It should be noted that the cost estimates presented in March 2017 (such as the value of £15M quoted) are no longer applicable. Cost estimates increased for all potential options due to changes in scheme costs resulting from the findings of offshore geotechnical investigations, which identified lower bedrock levels and greater sediment depth than had been expected. These changes were presented during the February 2019 consultation, and in the Scheme Recommendation Report.

The fourth point regarding the small craft moorings and viability of Millport Pier as follows:

*"It is also worth remembering that a breakwater between the Leug and the Spoig, (leaving the navigable channel between the Spoig and the Outer Eileann open), would still provide a considerable area of lee for the development of additional small craft moorings, that would bring much of the economic benefits of any marina development, and still leave the navigable channel open for larger craft, ferries, pleasure steamers etc., which also bring economic benefits of their own. Also, Caledonian MacBrayne have stated in the past, that it is of concern that the island has only one viable landing point (whilst the pier remains closed), and this proposed development would effectively spell the end of Millport Pier as a usable entity."*

*"Millport needs a working pier, as it's unlikely the use of the privately-owned pier at Keppel will continue for long given its light construction, and deteriorating condition, therefore closing off the navigable channel with an expensive and unnecessary section of breakwater (i.e. between the Spoig and the Outer Eileann), does not seem like a value-for-money proposition by any reasonable measure. It must be stressed, that whilst the proposals will leave the West Channel open, this will render the pier unusable by anything other than small craft as there will be insufficient manoeuvring room for any other vessels. Royal HaskoningDHV state in Chapter 23 (Tourism and Recreation) of their Environmental Statement that:*

*"The P.S. Waverley is the world's last sea-going paddle steamer and frequently operates on the Clyde between June and September. During the summer of 2013, the P.S. Waverley made 18 visits to Millport. Due to the unsafe condition of the timber pier the P.S. Waverley is currently unable to berth at Millport Pier and now stops at Keppel Pier (the Field Studies Centre). Visitors are transported to Millport town by bus. Visitors travelling into Millport from the P.S. Waverley support the local tourism economy, but with the vessel unable to berth within the own itself, a detrimental economic impact has been reported."*

*Whilst the report goes on to mention the MV Hebridean Princess, and its potential to manoeuvre behind the proposed breakwater, this is entirely misleading, as the vessel's draught precludes its use of Millport Pier, and the vessels calls to Millport are infrequent at best. It appears to have been used to promote the misconception that the pier will still be usable to vessels of this size on completion of the proposed works."*

For the alternative option which maintains a navigation channel between the Spoig and the Eileans, the area available for small craft moorings would be limited by the requirement to provide clearance to either side of the navigation channel. The existing small vessel anchorage located in the lee of the Leug and the Spoig would need to be relocated into the lee of the breakwater, reducing the area available for any additional moorings.



## Appendix 1 – Millport Coastal FPS - Objection Responses

The Commercial and Recreational Navigation chapter of the Environmental Statement (Chapter 13) for the scheme is supported by a desk-based navigation assessment (Appendix 13.1) which considers the changes to navigation due to the proposed offshore breakwater. The navigation assessment determined that the western channel and manoeuvring area inshore of the breakwater is feasible for vessels comparable to the Hebridean Princess, and for smaller fishing and recreational vessels typically visiting Millport.

Consultation with navigation and sailing organisations including the Northern Lighthouse Board, Clydeport and RYA Scotland has not identified significant concerns regarding the change in navigation route into Millport Bay, although it was recognised that Millport Pier would no longer be accessible to the P.S. Waverley. Ongoing consultation with Millport Harbour Users Group has also included discussion of navigation issues.

The navigation assessment recognises that the Hebridean Princess did not previously berth at Millport Pier when it was open, due to draught constraints. The Hebridean Princess has a draught of 3m, so a water depth of at least 4m is required. Bathymetric data shows that water depths on the seaward face of Millport Pier are between 1.9m and 3.4m at mean low water on a spring tide (MLWS), or between 4.9m and 6.4m at mean high water on a spring tide (MHWS).

The scheme proposals do not prevent future development of Millport Pier, which could include measures to improve access and allow larger vessels such as the Hebridean Princess to berth. Water depths at the pier indicate that it could be possible for the Hebridean Princess (and similar sized vessels) to temporarily berth for a short period at high tide. Limited dredging could extend the tidal window during which the pier would be accessible, with the offshore breakwater providing shelter to the seaward face of the pier.

The P.S. Waverley has recently undergone major refurbishment and was due to return to service in 2020. Consultation with the vessel operators indicated that it has always been difficult to berth the P.S. Waverley at Millport Pier, being strongly dependent on weather conditions. With concerns over the condition of the vessel and its ongoing economic viability, it could not be guaranteed that the P.S. Waverley would return to Millport Pier even if the pier was fully accessible.

Whilst the proposed scheme does not provide an additional landing point for CalMac ferries, the proposed breakwaters could provide shelter to vessels during storms.

The fifth point regarding value for money as follows:

*"This scheme needs to provide a value for money level of flood protection and should be a balance of needs and benefits. Under the current proposals, it is neither, particularly from a cost perspective, as the addition of one section of breakwater between the Spoig and the Eileanns almost doubles the cost of the scheme, from that which was originally proposed. Simply put, the substantial additional cost of one section of breakwater (between the Spoig and the Outer Eileann), and it's questionable benefits, surely cannot be justified at time when budgets are under so much pressure."*

An economic appraisal has been completed for the scheme based on guidance from the Scottish Government and current industry best practice. This considers the full cost of the whole scheme, and the flood protection benefits to the nation of protecting Millport against flooding. Local economic benefits of providing flood protection are also recognised. It is not appropriate to compare the cost of the breakwater between the Spoig and the Eileans to the previous cost estimates presented at an early stage of scheme development. The cost

## Appendix 1 – Millport Coastal FPS - Objection Responses

estimates for all potential scheme options have changed due to the information that is now known about constraints such as offshore geotechnical conditions. Removal of the breakwater between the Spoig and the Eileans is not a viable option in terms of flood protection and has never been presented as such.

In summary the Flood Protection Scheme is a significant one-off investment which can be a catalyst for future investments and regeneration projects.

I hope that the above information has helped to provide clarity on the issues you raised and allows you to reconsider your position in this matter, and to either withdraw your objection in writing or firming it up by the 22 June 2020.

The enclosed information will outline the process of dealing with objections if you strongly feel that your position remains unchanged.

Yours Sincerely



Team Leader - Flood Risk Management

Enc

Millport Coastal FPS Objection Procedure



## Appendix 1 – Millport Coastal FPS - Objection Responses

COMMERCIAL SERVICES  
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North Ayrshire Council  
Comhairle Siorrachd Àir a Tuath

Your Ref: [redacted] Our Ref: MCFPS/2020/019

If telephoning please call: [redacted]

29 June 2020

Objector No1 –  
2<sup>nd</sup> correspondence

### Millport Coastal FPS - Response to objection from [redacted]

Thank you for your correspondence regarding the Millport Coastal Flood Protection Scheme (FPS). I can confirm that your objection confirmation letter dated 15<sup>th</sup> June 2020 has been received. I address the points you made in your objection letter and I ask you to consider my response.

#### The first point regarding the scheme benefit as follows:

*"... what I am opposed to is the cost of a solution that mitigates a scenario with extremely long odds"  
"the island is crying out for investment, but not what would perhaps mitigate a weather scenario with odds of 1 in 200, or only benefit a limited number of harbour users and boat owners."  
"... all of these figures are based on a (rolling) 1 in 200 year storm scenario..."*

We would like to clarify that the proposed scheme will be designed to provide protection against flooding due to storm events with return periods of up to 1 in 200 years, or a probability of occurrence of 0.5% or more in any year. The proposed scheme would protect against the frequent flooding that occurs to parts of the Old Town and Stuart Street in most years, as well as the less frequent but more extreme weather events that could affect a much greater number of homes and businesses throughout the town, as well as causing damage to the seafront area and disruption to the local roads.

The table below, taken from the 2017 Flood Risk Assessment Update, shows the number of properties at risk of flooding for return period events from 1 in 1 year to 1 in 1000 years. This demonstrates that the proposed scheme would protect 650 properties if a 1 in 200 year return period event was to occur, and would also protect 91 properties from flooding that could occur every year.

The appraisal of the economic benefits of the proposed scheme follows best practice guidance and is based on the flood damages that would occur without the scheme due to all storm events that might be expected to occur in a 100-year period, not just the flood damages due to a 1 in 200 year event.

The flood protection scheme would also provide protection for events with return periods greater than 1 in 200 years, or an annual probability of occurrence of less than 0.5%. For these more extreme events, some flooding might still occur, but would be much less severe than if the scheme was not in place. The economic appraisal also accounts for the risk of these 'exceedance' events.

In terms of the number of people benefitting from the scheme, the table below shows that flood risk will be reduced to 650 properties. The provision of flood protection will also reduce the risk of damage to the seafront infrastructure, including the coastal road, to the benefit of the community and visitors. The economic benefit of the scheme is valued at £68m, with additional local economic benefits (e.g. for tourism)

Executive Director (Place): Russell McCutcheon

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of £48m. The significant government investment in flood risk infrastructure for Millport will open up the potential for future regeneration investment in the town.

Table 3 (2017 FRA Update): Summary of properties at risk of flooding

Location	Flood Risk Area	Properties at risk of flooding by return period (years / AEP)									TOTAL
		1	2	5	10	25	50	100	200	1000	
		100%	50%	20%	10%	4%	2%	1%	0.5%	0.1%	
West Bay Road	4B	0	0	12	12	12	12	12	12	12	12
Millburn Street	4A	59	94	157	163	163	163	163	163	163	183
Crichton Street											
Clyde Street											
Stuart Street	3B	0	0	56	70	134	142	157	184	185	186
Guildford Street	3A	0	0	12	13	16	28	38	40	41	41
Guildford Street											
Glasgow Street (Clifton St to College St)	2B	7	11	29	39	47	59	62	65	65	86
Glasgow Street (College St to Crocodile)											
Glasgow Street (Crocodile to Kelburn St)	2A	54	57	67	76	76	76	76	76	76	78
Kelburn Street & Kames Bay	1B	3	5	8	49	83	83	83	83	83	83
Marine Parade	1A	19	29	58	58	58	58	58	58	58	63
<b>TOTAL</b>	<b>All</b>	<b>91</b>	<b>383</b>	<b>384</b>	<b>443</b>	<b>688</b>	<b>802</b>	<b>847</b>	<b>860</b>	<b>860</b>	<b>860</b>

The second point regarding the maintenance of Millport Pier is as follows:

*"The Council have not seen fit to properly maintain Millport Pier over the years, yet now appear to have approx. £5m to contribute to this scheme? That sum would build a new pier that if correctly designed, would mitigate the majority of the flood protection issues to the areas that need it most (i.e. Stuart Street and Guildford Street)".*

Major repair work was carried out to the masonry section of Millport Pier last year and this was funded entirely by the Council, unlike major flood protection work which is funded on a 20/80 split between the Council and the Scottish Government respectively.

With regard to the timber pier, the decision not to make the major investment necessary to refurbish it was taken by the Council in 2014 following a study of the economic benefits of the pier that demonstrated that the return on the investment simply could not be justified. Following the campaign by local people to save the pier there was a suggestion that the community might step in to preserve the pier and the Council would support a viable community asset transfer.

The Council currently have no plans to demolish the pier.

You suggest that a new pier would mitigate the majority of the flood protection issues but there are some issues with that suggestion. Refurbishment of the existing timber pier would not provide flood protection and would not be supported by the Scottish Government. They were asked about supporting a refurbishment of the timber pier and have been specific in stating that they would not do so because it cannot be justified on flood protection grounds.

During the development of the scheme the designers did look at alternative pier options but the scale of these would have rendered the harbour virtually unusable and they also would have been unaffordable.



## Appendix 1 – Millport Coastal FPS - Objection Responses

They would also have been very different in construction from the current timber pier and so did not fit with the aspirations of local people in this regard.

The £5 million pound investment that the Council is intending to make to this scheme is a major undertaking from the Council's perspective and it is only because of the demonstrable benefits of the flood protection scheme, in terms of the prevention of damages to homes and businesses; the improvement of safety to those affected by flooding; and the opportunities for future development that the scheme might permit; that has allowed the Council to justify that investment.

The third point regarding the cost of Option 2 as follows:

*"With regard to Option 2 ... What is unclear however, is the costs attributed to this option?"*

We confirm that for the proposed scheme, £8.3m of the offshore breakwater costs relates to the section between the Spoig and the Outer Eilean, and £2.9m to the section between the Leug and the Spoig.

As stated in our previous response, the costs associated with the previously considered Option 2 are equivalent to the costs for the proposed scheme. The total length of the two breakwater arms that would be required for Option 2 is slightly less than the length of the continuous breakwater from the Spoig to the Outer Eilean. However, the alignment of the breakwater arms would be different to the continuous breakwater, to maximise the flood protection provided. Consequently, one of the breakwater arms would need to be constructed in deeper water, increasing costs.

The figure of £10.5m in relation to Option 2 was provided at the March 2017 consultation. This includes costs for the section of breakwater between the Leug and the Spoig and for the two breakwater arms between the Spoig and the Outer Eilean. It should be noted that the basis for the 2017 cost estimate for Option 2 is slightly different to the basis for the current cost estimate for the proposed scheme. The difference between these two values is about £1m, and not the £7m stated in your letter.

The fourth point on P.S. Waverley as follows:

*"Also whilst you correctly state that no potential cost benefits of a marina development have been included in the recommendation report..."*

*"Again, whilst the marina proposals were not presented by NAC personnel at the consultations, the representation of PS Waverley at the pier, which led many people to believe that the pier would still be able to function as a traditional pier (a key factor in many people's minds), was presented by an individual who has a vested interest in designing marinas, and it is debatable as to whether this should even have been allowed as part of the consultations?"*

*"The fact remains however, that the majority of people left these events with the impression that the island would still have a pier that could be used in the traditional sense."*

In addition to the consultation specific to the flood protection scheme, the February 2019 consultation event was attended by [REDACTED] (NAC Regeneration) and a modern apprentice placed with the Regeneration Team at that time. The consultants involved in the assessment of a potential marina were not invited to present at the consultation. If they were present at the event at any time then it would have been in an individual capacity and not on behalf of North Ayrshire Council.

The consultation materials published in August 2019, including the display boards and the accompanying Q&A sheet, stated that navigation routes in Millport Bay will be changed and the P.S. Waverley would no longer be able to berth in Millport Bay. This was also stated in the Environmental Statement accompanying the notified scheme.

Whilst improvements to the timber part of Millport Pier cannot be funded as part of the flood protection scheme, the proposed scheme does not prevent future improvements to the pier to enable its ongoing use by modern vessels. However, as already stated, this is unlikely to be funded by the Council because previous economic assessments have indicated that the costs could not be justified. However, the Council has recently invested in substantial repairs to the masonry part of the pier.

## Appendix 1 – Millport Coastal FPS - Objection Responses

### The fifth point on MV Hebridean Princess as follows:

*"I would also like to point out that the assertions made about the MV Hebridean Princess (and vessels of that ilk), are wholly inaccurate."*

As stated in our response to your original objection letter, the Commercial and Recreational Navigation chapter of the Environmental Statement (Chapter 13) for the scheme is supported by a desk based navigation assessment (Appendix 13.1) which considers the changes to navigation due to the proposed offshore breakwater. The navigation assessment was prepared by marine engineers based on industry standard guidance and considered the requirements for a range of vessel sizes. We have consulted with various navigation and sailing organisations and with other harbour users, who have not identified concerns about navigation access for the range of vessels identified in the assessment (vessels of equivalent size to the Hebridean Princess or smaller).

### The sixth point on Scheme cost compared to the 2017 Option 3 cost estimate as follows:

*"The irony in all of this, is that the original proposal for the scheme (Option 1), at 'just' £15.6m, provides the same level of protection as Option 3 at £25.4m, so it's hard to see the justification in the proposed spend, if the sole aim is indeed flood protection."*

Once again, the comparison between the 2017 cost estimate of £15.6m for Option 1 (nearshore breakwater) and the 2020 cost estimate of £25.4m for the proposed scheme is not appropriate because the basis for these cost estimates is different.

As explained in the previous response, the current cost estimate for the proposed scheme takes into account the findings of offshore geotechnical investigations and review of design requirements such as the alignment, foundation level and height of the offshore breakwaters. As set out in the 2018 Scheme Recommendation Report, following the offshore geotechnical investigations the cost estimate for Option 1 (nearshore breakwater) was revised to £33.5m, 20% higher than the cost estimate for the preferred offshore breakwater solution. Significant construction and environmental risks were also identified.

Other issues influencing the selection of the preferred option rather than Option 1 included feedback received during community consultation in relation to the visual impact of the scheme, associated tourism and economic impacts, and inshore navigation constraints.

### The seventh point on visualisation as follows:

*"At no point in any of the presentations or consultations has a model /visual representation been presented to show the visual impact of the Breakwater (or the proposed marina), from Millport Promenade."*

A video visualisation of the proposed scheme was presented at the February 2019 consultation, and updated for the August 2019 consultation. The videos were made available via the North Ayrshire Council website and can still be accessed in the following weblink. <https://www.north-ayrshire.gov.uk/community-safety/flooding/millport-coastal-fps.aspx>

This video includes the proposed breakwater structures, viewed from both onshore (Stuart Street) and offshore. The video visualisation was well received by the community, with many positive comments.

### The eighth point on mooring opportunities while leaving the navigational channel open as follows:

*"It is also worth remembering that a breakwater between the Leug and the Spoig (leaving the navigable channel between the Spoig and the Outer Eileann open), would still provide a considerable area of lee for the development of additional small craft moorings, that would bring much of the economic benefits of any marina development"*



## Appendix 1 – Millport Coastal FPS - Objection Responses

As stated in our previous response, additional small craft moorings are unlikely to be possible for the alternative option which maintains a navigation channel between the Spoig and the Eileann. This area in the lee of the breakwaters would be taken up by the existing moorings and small vessel anchorage, as well as providing suitable clearance to either side of the navigation channel.

The final point on value of money as follows:

*"This scheme needs to provide a value for money level of flood-protection and should be a balance of needs and benefits."*

The economic appraisal for the proposed flood protection scheme is based on set, industry standard criteria on how to assess benefits and costs for money for flood protection schemes. This consistent, objective and evidence-based process enables the Scottish Government to consider the value for money of the scheme against other similar schemes and other infrastructure investment. Based on this assessment, the Scottish Government and their advisors have confirmed that the proposed scheme meets the value-for-money criteria necessary to obtain grant funding.

I hope that the above information has helped to provide clarity on the issues you raised and allows you to reconsider your position in this matter, and to either withdraw your objection in writing or firming it up by the 20 July 2020.

Yours Sincerely



Team Leader - Flood Risk Management

## Appendix 1 – Millport Coastal FPS - Objection Responses

COMMERCIAL SERVICES  
Head of Service: David Hammond  
Cunninghame House, Irvine KA12 3EE  
Tel: 01284 310000  
www.north-ayrshire.gov.uk

Your Ref: [redacted] Our Ref: MCFPS/2020/016

If telephoning please call: [redacted]

29 May 2020



North Ayrshire Council  
Comhairle Siorrachd Àir a Tuath

Objectors No2&3

Identical objection  
letter & response

### Millport Coastal FPS - Response to objection from [redacted]

Thank you for your correspondence regarding the Millport Coastal Flood Protection Scheme (FPS), I can confirm that your formal objection letter dated 6<sup>th</sup> April 2020 has been received. I address the points you made in your objection letter as follows.

#### The first point regarding the navigation channel:

*"The proposal seems to have completely overlooked the fact that building a breakwater between the Spoig and the south Eilan would BLOCK the MAIN NAVIGATION CHANNEL for larger vessels approaching Millport pier."*

On the 11<sup>th</sup> December 2018, North Ayrshire Council Cabinet approved the recommended Preferred Option for the Millport Coastal Flood Protection Scheme, which comprises a 120m rock armour breakwater connecting The Leug and The Spoig islands and a 210m rock armour breakwater is constructed between The Spoig and the southern Eilean. The option also includes onshore flood walls and drainage improvements to minimise residual flood risks.

Consultation with navigation and sailing organisations including the Northern Lighthouse Board, Clydeport and RYA Scotland has not identified significant concerns regarding the change in navigation route into Millport Bay, although it was recognised that Millport Pier would no longer be accessible to the P.S. Waverley. Consultation with Millport Harbour Users Group has also included discussion of navigation issues.

The purpose of the February 2019 community engagement events was to gauge the public opinion on the Council's Preferred Option. The consultation events were very successful, there were between 170 and 200 visits made to the design workshops. A large proportion of local residents took an active role and provided their feedback during those discussions.

The above demonstrates that the Council consulted on the preferred option with not just the local residents and above listed Organisations but the Harbour Users Group too, which had a representation from the local boat owners, Council Elected Members, the Cumbrae Community Development Company and Local Community Council.

Executive Director (Place): Russell McCutcheon

## Appendix 1 – Millport Coastal FPS - Objection Responses

The Council also submitted a copy of the Scheme Recommendation Report to Scottish Government in 2018, which detailed all developed mitigation options and the reason why the preferred option is the best solution based on technical, environmental and financial considerations.

The Scheme Notification process requires the Council to produce and make available the Environmental Impact Assessment Document, during the consultation period, which is accessible from the following link from the North Ayrshire Council website:

<https://www.north-ayrshire.gov.uk/community-safety/flooding/millport-coastal-fps.aspx>

The Commercial and Recreational Navigation chapter of the Environmental Statement (Chapter 13) for the scheme is supported by a desk-based navigation assessment (Appendix 13.1) which considers the changes to navigation due to the proposed offshore breakwater. The navigation assessment determined that the western channel and manoeuvring area inshore of the breakwater is feasible for vessels comparable in size to the Hebridean Princess, and for smaller fishing and recreational vessels typically visiting Millport.

The scheme proposals do not prevent future development of Millport Pier, which could include measures to improve access and allow larger vessels such as the Hebridean Princess (or similar) to berth. Water depths at the pier indicate that it could be possible for the Hebridean Princess (and similar sized vessels) to temporarily berth for a short period at high tide. Limited dredging could extend the tidal window during which the pier would be accessible, with the offshore breakwater providing shelter to the seaward face of the pier.

The P.S. Waverley has recently undergone major refurbishment and was due to return to service in 2020. Consultation with the vessel operators indicated that it has always been difficult to berth the P.S. Waverley at Millport Pier, being strongly dependent on weather conditions. With concerns over the condition of the vessel and its ongoing economic viability, it could not be guaranteed that the P.S. Waverley would return to Millport Pier even if the pier was fully accessible.

Whilst the proposed scheme does not provide an additional landing point for CalMac ferries, the proposed breakwaters could provide shelter to vessels during storms.

### The second point regarding the economic impact as follows:

*"But blocking the main navigation channel to the pier would inevitably seriously damage tourism, which in turn would have a huge impact on the economic development and regeneration of Millport.*

*Larger vessels, such as The Waverley Paddle Steamer would NOT be able to navigate into the pier under the "preferred" option stated."*

I would like to address two important points here.

1. Step ashore facilities by the Waverley and similar size of vessels
2. Wider economic and regeneration aspects



## Appendix 1 – Millport Coastal FPS - Objection Responses

1. The Council recognises that the P.S. Waverley is an aging but iconic boat, and its short visits to Millport, which are restricted to the Summer season (between May and October) has a small but positive benefit to the local economy. The local economy could benefit from a maximum of 15 visits (1224 passengers) spending an estimated maximum of £40,000 annually. This equates to about £32 per person, which is a generous estimate.

Since 2014 the Waverley has had to dock at Keppel Pier (situated to the north east of the town) and the disembarked passengers were bussed into Millport town due to and the poor condition of the timber section of Millport Pier. In 2019 the Waverley was not in operation at all due to refurbishment.

The Waverley vessel has a relatively large turning circle. Although the overall dimensions of the P.S. Waverley (73m length) are similar to the Hebridean Princess, the Hebridean Princess is fitted with a bow thruster and twin stern propellers and is therefore more manoeuvrable than the paddle steamer, so would be able to dock at the Millport pier, if the pier was in a suitable condition.

The Waverley is able to visit Millport by docking at Keppel Pier and the Millport Coastal Flood Protection Scheme (FPS) will not affect that.

The reason that the Millport Coastal FPS could not include the refurbishment of the timber section of the Millport Pier is due to the rules of the Government Grant Funding. Funding is strictly for flood protection measures and the refurbishment of the timber pier is not such. The Scheme does not negatively impact on the Pier and there might be an opportunity to refurbish the pier from the auspices of the Ayrshire Growth Deal.

2. Wider economic and regeneration aspects

The Council recognises that tourism and regeneration is very important for the local community. The development of options for the proposed scheme were influenced by the local community during the many consultation events and design workshops. It was the Community who suggested to the Council to explore closing the existing navigational channel and while providing the required level of flood protection, create a sheltered harbour area which has the potential to be developed into a small marina in later years. The wider community feels that this would be a robust opportunity which could generate income for the town, not just for the small shops but hotels, restaurants etc and encourage visitors to stay overnight and spend more and use the local services.

Millport's economic success is also based on businesses being protected from flooding, and that citizens who own/rent properties in the flood risk areas are able to insure their home and avoid the continuous damages and related cost caused by the wave overtopping from the sea.

The Council's preferred option had positive community support, which was confirmed during the community engagement days, which included positive feedback on the option facilitating potential future regeneration opportunities. There is also still a strong desire within the community for preserving the Millport timber pier if the community can secure funds.



## Appendix 1 – Millport Coastal FPS - Objection Responses

The third point regarding the breakwater as follows:

*"The earlier proposal for a shorter breakwater between the Leug and the Spoig (without the extended breakwater between the Spoig and Eilans) would offer a much cheaper alternative, with only a slightly lower flood prevention benefits, whilst allowing the main navigation channel (to the pier) to remain open and accessible to larger tourist vessels."*

An offshore breakwater between only the Leug and the Spoig has not been assessed, nor presented during public consultation, as a viable option for providing flood protection to Millport. This would not provide sufficient protection to Millport seafront against waves from south to south easterly directions.

You may be referring to the option that was presented at the March 2017 consultation which included a breakwater between the Leug and the Spoig plus two offshore breakwater arms extending from the Spoig and form the Outer Eilean. This option would enable vessels to continue to navigate between the Spoig and the Eileans, but the navigation channel width would be reduced to about 40m, compared to an existing channel width of >100m. The navigation route between the breakwaters would be changed from the existing leading line.

With a gap in the breakwater, the wave height inshore is not reduced as much. The wave height at the Stuart Street Sea wall would be between 1.0m and 1.2m, compared to 0.8m with the continuous breakwater. Therefore, the residual risk of flooding to Stuart Street is greater than for the proposed breakwater. For Glasgow Street, inshore wave heights and associated wave overtopping is higher with this option when compared to the proposed scheme, requiring higher onshore flood walls.

The costs associated with this breakwater option are equivalent to the estimated costs for the proposed breakwater between the Leug and the Outer Eilean. Although the length of the breakwater arms is less than for the continuous breakwaters, the separate breakwater arms would need to be constructed in deeper water. Costs for onshore works to Glasgow Street would be slightly higher due to the higher flood walls.

This option was rejected by the Council due to the lower standard of protection provided to Stuart Street and Glasgow Street, and the potential safety risks associated with the reduction in navigation channel width.

It should be noted that the cost estimates presented in March 2017 are no longer applicable. Cost estimates increased for all potential options due to changes in scheme costs resulting from the findings of offshore geotechnical investigations. These changes were presented during the February 2019 consultation, and in the Scheme Recommendation Report.

In summary the Council wants to build the best possible Flood Protection Scheme for the residents and visitors of Millport and has considered the values of the past and present whilst aiming to open up new opportunities for the future. We would like to see that Millport will become a stronger and more resilient community, with the flood protection scheme aiding this vision.

The Millport community is very engaged in the scheme development and understands just how they have influenced the scheme development so far. The community is prepared to continue working with the Council to help shaping the Flood Protection Scheme in the coming months throughout the detail design phase.

The Flood Protection Scheme is a significant one-off investment which can be a catalyst for future investments and regeneration projects.

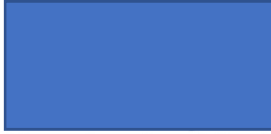
I hope that the above information has helped to provide clarity on the issues you raised and allows you to reconsider your position in this matter, and to either withdraw your objection in writing or firming it up by the 22 June 2020.

Executive Director (Place): Russell McCutcheon

## Appendix 1 – Millport Coastal FPS - Objection Responses

The enclosed information will outline the process of dealing with objections if you strongly feel that your position remains unchanged.

Yours Sincerely



Team Leader - Flood Risk Management

Enc

Millport Coastal FPS Objection Procedure

Executive Director (Place): Russell McCutcheon

## Appendix 1 – Millport Coastal FPS - Objection Responses

COMMERCIAL SERVICES  
Head of Service: David Hammond  
Cunninghame House, Irvine KA12 8EE  
Tel: 01294 310000  
www.north-ayrshire.gov.uk

Your Ref: [redacted] Our Ref: MCFPS/2020/018

If telephoning please call: [redacted]

29 May 2020



[redacted]  
Director  
Waverley Excursions Ltd.  
36 Lancefield Quay  
Glasgow,  
G3 8HA

### Millport Coastal FPS - Response to objection from Waverley Excursions Ltd.

Thank you for your correspondence regarding the Millport Coastal Flood Protection Scheme (FPS), I can confirm that your formal objection letter dated 11<sup>th</sup> May 2020 has been received.

#### Previous consultation with Waverley Excursions

As recorded in Chapter 13 of the Environmental Statement (Commercial and Recreational Navigation), Amy Savage had a telephone discussion with Captain [redacted], a pilot of the PS Waverley, on 3rd May 2018. Captain [redacted] said that the turning circle of the PS Waverley is "about half a mile", and that if offshore breakwaters were to be constructed, the PS Waverley would not have sufficient space to be able to turn inshore of the breakwaters, so the PS Waverley could not return to Millport Pier. Captain [redacted] also commented that berthing at Millport Pier has always been difficult (not noted in the Environmental Statement). Captain [redacted] also gave his personal opinion that the potential benefits of providing additional shelter in Millport Bay (from offshore breakwaters) would outweigh the impact of the Waverley not being able to return to the pier.

Since that conversation, North Ayrshire Council were contacted by [redacted] of Waverley Excursions on 10th September 2019 regarding the scheme proposals, based upon Waverley Excursion's review of the August 2019 public consultation materials. A response was provided, dated 17 September 2019, explaining the scheme proposals in the context of the impact on the future ability of the PS Waverley to berth at Millport. This stated that with the proposed scheme there would not be sufficient space for the P.S. Waverley to turn inshore of the breakwaters, unless bow thrusters were fitted.

The response recognised that there were a few local residents who have raised concerns about the proposed changes to navigation, including the impact on the P.S. Waverley, but that public opinion on the preferred option was otherwise positive, recognising the potential wider benefits of the scheme, in addition to the provision of flood protection.

The response also noted that the Flood Protection Scheme proposals did not include works to refurbish or replace Millport Pier, but would not restrict such works being undertaken in the future.

Executive Director (Place): Russell McCutcheon



## Appendix 1 – Millport Coastal FPS - Objection Responses

On the 18 September 2019 [REDACTED] replied as follows:

*"Thank you for coming back to me and for the additional details. I would agree that with the breakwater being built it would prevent future calls by Waverley if the pier was able to be used. Hopefully we will be able to use Keppel for a number of years to come when we return to service next summer."*

Waverley Excursions was offered the opportunity to discuss the scheme further but did not contact the project team again. Therefore, we had considered that sufficient information had been provided.

Below I will address the points you made in your objection letter and I ask you to consider my response.

The first point regarding the Millport Pier and the cost of the breakwaters as follows:

*"While we do recognise that repairs to the pier are not included in the Coastal Flood Protection Scheme, the closure of the navigation channel would remove any future possibility of Waverley being able to berth at Millport Old Pier. Moreover, we question the cost of the proposed breakwater as a percentage of the whole scheme against the added extra protection it will provide. Considering the breakwater in two sections, the smaller section (120m) between The Leug and The Spoig will have no impact on navigation unlike the larger section (210m) proposed between The Spoig and the South Eilean."*

*Waverley's normal berthing procedure when using Millport Old Pier is an approach via the navigation channel between The Spoig and the South Eilean, berth on the seaward side of the pier on the timber section and depart by canting on the corner of the wooden pier and sail out between the main island and The Leug. She has on a rare occasion ran astern through the navigation channel between The Spoig and South Eilean after berthing on the smaller face of the wooden section."*

### **Millport Pier**

Millport Pier remains out of use at present because of the poor condition of the timber section. As noted in the initial comment from Waverley Excursions, funding for the Flood Protection Scheme does not cover the costs of refurbishing Millport Pier, as this cannot be justified as flood protection works. North Ayrshire Council has completed various assessments of the economic benefits associated with Millport Pier, including consideration of the economic benefits of enabling the PS Waverley to return to Millport. These assessments have all shown that it is not economically viable to replace the timber part of the pier or to undertake substantial refurbishment. Therefore, even if the proposed offshore breakwaters were not constructed, it is very unlikely that the P.S. Waverley would be able to return to Millport Pier in the near future. This issue was highlighted in the response provided to Waverley Excursions in September 2019.

### **Proposed offshore breakwaters and closure of the existing navigation channel**

An offshore breakwater between only the Leug and the Spoig would not provide sufficient flood protection to the Stuart Street part of Millport, where the majority of local businesses are located, against waves from the south and south-east. Therefore, this has not been presented as a possible solution, and it is not appropriate to compare the scheme costs to the costs if the breakwater from the Spoig to the outer Eilean was not part of the scheme.

## Appendix 1 – Millport Coastal FPS - Objection Responses

An option that was presented at the March 2017 consultation included a breakwater between the Leug and the Spoig plus two offshore breakwater arms extending from the Spoig and from the Outer Eilean. Whilst this option would maintain a channel between the Spoig and the Eileans, the channel width would be reduced to about 40m, compared to an existing navigation channel width of >100m. The navigation route between the breakwaters would be changed from the existing leading line.

With a gap in the breakwater, the wave height inshore is not reduced as much as with the continuous breakwater, so the residual risk of flooding to Stuart Street and Glasgow Street is greater. Higher onshore flood walls to Glasgow Street would be needed with this option.

The costs associated with this breakwater option are equivalent to the estimated costs for the proposed breakwater between the Leug and the Outer Eilean. Although the length of the breakwater arms is less than for the continuous breakwaters, the separate breakwater arms would need to be constructed in deeper water. Costs for onshore works to Glasgow Street would be slightly higher due to the higher flood walls.

This option was rejected by NAC due to the lower standard of protection provided to Stuart Street and Glasgow Street, and the potential safety risks associated with the reduction in navigation channel width.

Other alternative solutions to protect Stuart Street, such as replacing the sea wall or a rock revetment, have been considered but were shown to be non-viable due to the visual impact associated with raising the height of the sea wall.

The second point regarding the Consultation information showing the PS Waverley berthed at Millport Pier as follows:

*"On previous information published in relation to the Millport Coastal Flood Protection Scheme, Waverley was shown to be berthed at Millport Old Pier with the breakwater in place between The Spoig and the South Eilean. This representation could have misled locals since Waverley will not be able to berth at the pier should the navigation channel be blocked with a breakwater. Some may have supported Option 2 in the scheme having been given the impression that Waverley would still be able to berth at Millport Old Pier subject to it being repaired."*

We acknowledge that a plan drawing showing the PS Waverley at Millport Pier was included in the display materials presented by the NAC Tourism and Coastal Economy team at the March 2019 consultation event. Unfortunately, the Flooding team was not shown these materials prior to the event and so was not able to correct the error. The plan showing the PS Waverley was recognised as being potentially misleading, and during the consultation event the Flood Protection Scheme project team used best efforts to clarify this issue. There has subsequently been clear communication, during meetings with the Millport Harbour Users Group and in the Environmental Statement, that Millport Pier will no longer be accessible to the PS Waverley.



## Appendix 1 – Millport Coastal FPS - Objection Responses

### The third point regarding the Viability of Keppel Pier and the PS Waverley as follows:

*"Waverley used Millport Old Pier until it was closed in June 2014 due to the condition of the timber section. She has since used Keppel pier although passenger numbers have fallen given the distance between Keppel and the town of Millport. We are concerned that Keppel pier will not be able to accommodate Waverley in the longer term and therefore the Island of Cumbrae will eventually be lost from Waverley's programme unless access to Millport Old Pier can once again be re-established."*

Subject to the agreement of the owners of Keppel Pier, this is currently still available for use by the PS Waverley. Whilst the future viability of Keppel Pier may be uncertain, this is also the case for the PS Waverley itself, given the recent issues with its condition and financial viability. Previous consultation with the vessel operators indicated that it has always been difficult to berth the P.S. Waverley at Millport Pier, being strongly dependent on weather conditions. Climate change is expected to increase sea levels and the frequency of severe storms. Considering these issues, it could not be guaranteed that the PS Waverley would be able to return to Millport even if the pier was fully accessible.

*"Waverley was withdrawn from service in 2019 subject to a public appeal which raised £2.3 million to allow works to be carried out to reboiler the vessel. The appeal was supported by the Scottish Government which contributed £1 million. This boiler refit work is currently underway and is expected to be completed by June 2020. Replacing the boilers will allow Waverley to remain in service for many years to come with the new boilers expected to last at least a 20-year period. During the Boiler Refit Appeal, a local 4-year old boy (Ethan Pringle) was pushed round Cumbrae in his wheelchair to raise funds for Waverley. This act of fundraising drew attention from locals on the island and beyond with Ethan being front page news in the local paper. This demonstrated the nature of the community spirit on the island and the affection that so many hold for Waverley. Indeed, on many of Waverley's calls at Millport Old Pier the local pipe band would gather to play for Waverley's arrival and departure creating a great sense of occasion and community spirit at the pier."*

We recognise that the PS Waverley is an iconic vessel and that its visits to Millport have a great cultural and social importance to locals and visitors. The potential impacts of the scheme on the PS Waverley were taken into account in the development of the proposed solution, including in the economic appraisal of the scheme. Unfortunately, it has not been possible to identify a technically and economically viable scheme that maintains access for the PS Waverley. Whilst this is disappointing, we note that Millport is not the only calling point on the PS Waverley's Clyde cruises, and visits to Cumbrae can still currently be made via Keppel Pier.

The Flood Protection Scheme proposals do not prevent future development of Millport Pier, which could include measures to improve access and allow larger vessels to berth in the future, potentially including the PS Waverley if future modifications improved her manoeuvrability to enable access to more piers and harbours. The increased shelter provided by the proposed offshore breakwaters is expected to enable local moorings provision for small vessels to be increased. These long-term benefits were also an important consideration in the development of the scheme proposals.

In conclusion, the project team has undertaken extensive investigations to assess the impact of the proposed scheme on the PS Waverley and to try to identify solutions which maintained access to Millport Pier. Unfortunately, this has not been possible, and the negative impacts of this have been recognised in the Environmental Statement. The proposed Millport Flood Protection Scheme will provide significant economic benefit to the town through the reduction in flood risk to

## Appendix 1 – Millport Coastal FPS - Objection Responses

residents and businesses, enabling economic regeneration and improvement of the local tourism offer because the seafront area is better protected.

The Millport Coastal Flood Protection Scheme is a significant one-off investment which can be a catalyst for future investments and regeneration projects.

I hope that the above information has helped to provide clarity on the issues you raised and allows you to reconsider your position in this matter, and to either withdraw your objection in writing or firming it up by the 22 June 2020.

The enclosed information will outline the process of dealing with objections if you strongly feel that your position remains unchanged.

Yours Sincerely



Team Leader - Flood Risk Management

Enc

Millport Coastal FPS Objection Procedure



## Appendix 1 – Millport Coastal FPS - Objection Responses

**COMMERCIAL SERVICES**  
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**North Ayrshire Council**  
Comhairle Siorrachd Àir a Tuath

Your Ref: [redacted] Our Ref: MCFPS/2020/020

If telephoning please call: [redacted]

29 June 2020

Objector No5

KA280EZ

Dear [redacted]

**Millport Coastal FPS - Response to objection from [redacted]**

Thank you for your correspondence regarding the Millport Coastal Flood Protection Scheme (FPS). I can confirm that your objection letter dated 18<sup>th</sup> June 2020 has been received. I address the points you made in your objection letter as follows.

### The first point regarding the closure of the existing navigation channel:

*"My principle objection is to the closing of the deep-water channel or 333 approach to Millport pier. It seems short sighted to exclude the opportunity of a larger vessel to visit Cumbrae. The island now is serviced by one only access being Cumbrae Slip. There is no resilience should this become unavailable for any unforeseen circumstance. The Pier at Millport would well benefit form a Summer only passenger service from Hunterton or Fairlie with a park and ride to the town of Millport. This needs to be considered as the holiday traffic is not sustainable."*

The Commercial and Recreational Navigation chapter of the Environmental Statement (Chapter 13) for the scheme is supported by a desk-based navigation assessment (Appendix 13.1) which considers the changes to navigation due to the proposed offshore breakwater. The navigation assessment determined that the alternative channel to the west of the Leug and the manoeuvring area inshore of the offshore breakwaters is feasible for vessels of comparable size to the Hebridean Princess (length 72m, beam 13m, draught 3m), and for smaller fishing and recreational vessels typically visiting Millport. It was confirmed that Millport Pier would no longer be accessible to the P.S. Waverley, unless modifications were made to improve the vessel's manoeuvrability. The Environmental Statement is accessible via the North Ayrshire Council website:

<https://www.north-ayrshire.gov.uk/community-safety/flooding/millport-coastal-fps.aspx>

The alternative channel to the west of the Leug is wider than the existing navigation channel between the Spoig and the outer Eilean, based on the 2mCD depth contour. The minimum depth of the western channel is also greater than the minimum depth between the Spoig and the Eileans.

Executive Director (Place): Russell McCutcheon



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Consultation with navigation and sailing organisations including the Northern Lighthouse Board, Clydeport and RYA Scotland has not identified significant concerns regarding the change in navigation route into Millport Bay, other than the recognition of the impact on the P.S. Waverley. Ongoing consultation with Millport Harbour Users Group has also included discussion of navigation issues.

With the closure of the existing navigation channel by the offshore breakwaters, navigation aids would be provided as part of the proposed scheme to enable safe use of the new channel to the west of the Leug. The requirements for these would be agreed with the relevant navigation authorities, including Clydeport and the Northern Lighthouse Board.

The navigation assessment recognises that the Hebridean Princess did not previously berth at Millport Pier when it was open, due to draught constraints. The Hebridean Princess has a draught of 3m, so a water depth of at least 4m is required. Bathymetric data shows that water depths on the seaward face of Millport Pier are between 1.9m and 3.4m at mean low water on a spring tide (MLWS), or between 4.9m and 6.4m at mean high water on a spring tide (MHWS).

Whilst the scheme proposals do not include any works to Millport Pier, they do not prevent the pier's future development, which could include measures to improve access and allow larger vessels such as the Hebridean Princess to berth. Water depths at the pier indicate that it could be possible for the Hebridean Princess (and similar sized modern vessels) to temporarily berth for a short period at high tide. Limited dredging could extend the tidal window during which the pier would be accessible, with the offshore breakwater providing improved shelter to the pier. Sufficient clearance would need to be maintained between the pier and any moorings to enable large vessels to turn in the lee of the offshore breakwaters.

Whilst the proposed scheme does not provide an additional landing point for CalMac ferries, the proposed breakwaters could provide shelter to vessels during storms.

The second point regarding risk of water being trapped behind flood walls as follows:

*"Crichton Street the installation of the wall could well make it worse trapping water behind."*

The detailed design of the scheme will include addressing the requirements for drainage of spray or residual overtopping water past the proposed flood walls in all locations. At Crichton Street, the flood wall includes access points which will be designed to allow surface water drainage past the flood wall.

The third point regarding design wave conditions as follows:

*"Wave height I believe the base line height used is exaggerated thus making the modelling much greater than required."*

The design conditions for the proposed flood protection scheme consider the potential combined water level and wave conditions that result in a 1 in 200 year return period flood event, i.e. flooding that might be expected to occur on average once every 200 years, or 0.5% probability in any year. This is the best practice design standard for coastal flood protection schemes. The input data is based on the UK Met Office wave model, informed by the national network of wave buoys. Offshore waves are transformed to nearshore using industry standard numerical modelling methods. The modelling report for the scheme (including the process followed and the results) has been reviewed and accepted by SEPA technical staff who are familiar with the local conditions.

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At Millport, the worst-case conditions for flooding due to wave overtopping are more dependent on the water level than on the nearshore wave height, which is typically limited by the water depth. Therefore, the offshore wave conditions have much less influence on the modelling results than the projected future water levels, allowing for sea level rise and increased frequency of storm events.

The final point regarding budget cost for the proposed scheme can be achieved as follows:

*“Cost I do not believe the council will deliver the scheme on budget and the proposed protection would be out weight by the loss of natural ascetics of the Island.”*

An economic appraisal has been completed for the scheme based on guidance from the Scottish Government and current industry best practice. This considers the full cost of the whole scheme, and the flood protection benefits to the nation of protecting Millport against flooding. Local economic benefits of providing flood protection are also recognised.

The cost estimate for the scheme includes a significant risk allowance to account for potential unforeseen issues that may arise during the detailed design and construction phases. The cost estimate will also be kept under review throughout the detailed design phase with the aim of achieving savings. Overall it is considered that the current cost estimate for the scheme is robust and the budget can be met.

In summary the Council wants to build the best possible Flood Protection Scheme for the residents and visitors of Millport and has considered the values of the past and present whilst aiming to open up new opportunities for the future. We would like to see that Millport will become a stronger and more resilient community, with the flood protection scheme aiding this vision.

The Millport community is very engaged in the scheme development and understands just how they have influenced the scheme development so far. We expect the community to continue working with the Council to help shape the Flood Protection Scheme in the coming months throughout the detail design phase.

The Flood Protection Scheme is a significant one-off investment which can be a catalyst for future investments and regeneration projects.

I hope that the above information has helped to provide clarity on the issues you raised and allows you to reconsider your position in this matter, and to either withdraw your objection in writing or firming it up by the 20 July 2020.

The enclosed information will outline the process of dealing with objections if you strongly feel that your position remains unchanged.

Yours Sincerely



Team Leader - Flood Risk Management

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Millport Coastal FPS Objection Procedure

Executive Director (Place): Russell McCutcheon