



# Ayrshire Shoreline Management Plan

## Consultation Summary Report

IBE1107Rp0005 July 2018







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# 1 INTRODUCTION

This report summarises the consultation activities which took place between 29<sup>th</sup> January 2018 and 20<sup>th</sup> April 2018 in relation to the draft Ayrshire Shoreline Management Plan and its associated Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). It further outlines the submissions, comments and observations which were received.

## 1.1 CONTRACTUAL CONTEXT

Section C3 of the Project Brief for the Ayrshire Shoreline Management Plan requires the following;

As part of the development of the Ayrshire Shoreline Management Plan, the Consultant shall:

- Attend public consultation events to provide stakeholders, and the public, with the opportunity to review and comment upon the draft Plan;
- Undertake presentation of the SMP and address comments on its development and intended use.

## 1.2 SUBJECT OF CONSULTATION

The subject of the consultation activities was:

- The draft Ayrshire Shoreline Management Plan, including its associated:
  - draft SEA Environmental Report; and
  - draft HRA Record.

## 1.3 PRINCIPLE AIMS OF CONSULTATION

The aims of the communication activities which took place between January 2018 and April 2018 can be summarised as follows:

- To undertake general awareness raising;
- To increase stakeholder understanding in relation to the rationale and methodology behind the development of the Shoreline Management Plan;
- To elicit and record the views of stakeholders with respect to the:

- identification of significant social, technical, economic or environmental issues with respect to the Shoreline Management Plan;
  - identification of potential alternative policies for individual sub-cells or policy units;
  - identification of preferences for policies within individual sub-cells or policy units.
- To inform stakeholders with respect to their opportunities to feed into and influence the development of the Plan and its associated environmental reports.

## **1.4 CONTENT OF THIS DOCUMENT**

This report describes the consultation activities which took place between January 2018 and April 2018 in the form of a series of Public Consultation Days (PCDs) and open web-based consultation.

It also summarises:

- The format of the events;
- The target audience of the events;
- Comments made and issues raised at the events, and in subsequent submissions.

## 2 EVENT PLANNING

To assist with the planning of, preparation for, and execution of the public consultation on the draft Ayrshire Shoreline Management Plan, a detailed Communication Plan was developed. The Communication Plan provided details of:

- The principles of consultation and communications;
- A list of primary, secondary and other stakeholders;
- Communication planning procedures, including messages, audiences and tools;
- Procedures for communication and recording feedback.

### 2.1 MATERIALS

Materials developed for the draft Ayrshire SMP consultation included primary consultation materials as well as supporting materials:

#### 2.1.1 Consultation materials

- Draft copies of the Plan, including its appendices, and its associated environmental reports.

#### 2.1.2 Supporting materials

- Draft maps of the preliminary shoreline management policy options;
- Attendance sheets;
- Questionnaires;
- Information banners;
- Laptop and projector for rolling PowerPoint presentation.

### 3 CONSULTATION ACTIVITIES

Consultation activities that took place between January 2018 and April 2018 on the draft Shoreline Management Plan included:

- holding a series of Public Consultation Days to outline, and elicit feedback on, the draft Shoreline Management Plan and its associated environmental reports;
- carrying out a web-based consultation to enable people to consider, and provide feedback on, the draft Shoreline Management Plan and its associated environmental reports;
- providing access to the Plan document, and its associated environmental reports, at key locations (North Ayrshire Council and South Ayrshire Council premises) to raise awareness and disseminate information in relation to the Plan.

#### 3.1 PUBLIC CONSULTATION DAYS

In general, the PCDs were held in areas of North and South Ayrshire with relatively high population density. PCDs were held on the Isle of Arran and on Great Cumbrae, given their relative remoteness, in order to facilitate participation by the local communities.

Each Public Consultation Day was operated on a drop in format with the following facilities available:

- information stand set-up (copies of relevant documents and maps of individual sub-cells and policy units were presented on tables with space for groups to stand around and view them);
- registration table with attendance sheet;
- several sets of tables and chairs to facilitate discussion and completion of comment sheets; with supporting materials on-hand (see Section 2.1.2).

Table 3.1 provides details of the location, venue, date and time for the Public Consultation Days. The Local Authority and RPS personnel that attended each PCD are also summarised in this table. Within the PCD's both RPS and Council staff facilitated one-to-one or small group discussions as required.

**Table 3.1 Public Consultation Day details**

Location	Venue	Date and time	RPS	LA
Irvine	Irvine Library	Monday 19 <sup>th</sup> February 2018 12:00 – 19:00	MB, DK	PR
Isle of Great Cumbrae	Millport Library	Tuesday 20 <sup>th</sup> February 2018 12:00 – 18:50	MB, DK	PR
Ardrossan	Ardrossan Civic Centre	Wednesday 21 <sup>st</sup> February 2018 12:30 – 19:00	MB, DK	PR
Isle of Arran	Arran Library	Thursday 22 <sup>nd</sup> February 2018 12:00 – 18:30	MB, DK	PR
Largs	Largs Library	Friday 23 <sup>rd</sup> February 2018 12:00 – 18:30	MB, DK	PR
Prestwick	Prestwick Library	Monday 5 <sup>th</sup> March 2018 14:00 – 18:00	MB, DK	SG
Ayr	Carnegie Library	Tuesday 6 <sup>th</sup> March 2018 14:00 – 18:00	MB, DK	SG
Girvan	Girvan Library	Wednesday 7 <sup>th</sup> March 2018 14:00 – 17:00	MB, DK	SG
Troon	Troon Library	Thursday 8 <sup>th</sup> March 2018 14:00 – 18:00	MB, DK	SG

Local Authority:

- PR = Patricia Rowley, North Ayrshire Council
- SG = Scott Greig, South Ayrshire Council

RPS:

- MB = Malcolm Brian
- DK = Danielle King

## 4 WEBSITE CONSULTATION

Consultation material was also uploaded to the Council websites and functionality to receive comments via the website was incorporated, as outlined in Table 4.1.

**Table 4.1 Details of study website consultation**

Element	Website Consultation
Materials	<ul style="list-style-type: none"> <li>• SMP Consultation Mandate (North Ayrshire only);</li> <li>• SMP Consultation Draft Plan;</li> <li>• SMP Consultation Draft Plan Appendices;</li> <li>• SMP Habitats Regulation Appraisal Record ;</li> <li>• SMP SEA Environmental Report;</li> <li>• SMP PCD Banners;</li> <li>• Questionnaire (North Ayrshire only).</li> </ul>
Functionality	<ul style="list-style-type: none"> <li>• Users could download each of the documents individually as a PDF;</li> <li>• On the North Ayrshire website, a link was provided to a Survey Monkey version of the questionnaire;</li> <li>• On the South Ayrshire website, general comments could be left in a comment box at the bottom of the page.</li> </ul>
Timing	<ul style="list-style-type: none"> <li>• The websites for North Ayrshire and South Ayrshire Councils went live on the first day of public consultation (29<sup>th</sup> January 2018). The documents remained available on each of the websites until the end of the consultation period.</li> </ul>

## 5 SUBMISSIONS, OBSERVATIONS AND COMMENTS

Submissions, observations and comments were received at the Public Consultation Days and via the North Ayrshire and South Ayrshire Council websites, as well as by letter, email and telephone. Comments which arose during public consultation events were generally addressed directly during these events by the RPS and Local Authority personnel who were on hand to provide clarification on any technical queries and to raise awareness of the formal consultation process.

The comments received during public consultation events were generally positive and in agreement with the proposed policies for each policy unit or sub-cell and the Ayrshire coast as a whole. Where disagreement was expressed, it was mostly in relation to particular localised issues as opposed to issues affecting the entire policy unit or sub-cell. However all issues raised were noted, along with any suggestions for amendments or future work in order to ensure that the consultation process was fully inclusive.

One recurring comment related to concern with regard to the timescale for the implementation of the Plan, and any works which may result.

Table 5.1 summarises the number of attendees (approximately) at each PCD.

**Table 5.1 Number of people who attended PCDs**

Venue	County	PCD Attendees
Irvine	North Ayrshire	>10
Isle of Great Cumbrae	North Ayrshire	>10
Ardrossan	North Ayrshire	>10
Isle of Arran	North Ayrshire	>50
Largs	North Ayrshire	>10
Prestwick	South Ayrshire	<10
Ayr	South Ayrshire	<10
Girvan	South Ayrshire	<10
Troon	South Ayrshire	<10

## 5.1 GENERAL COMMENTS AND OBSERVATIONS

Comments and observations expressed through formal submissions and questionnaire responses received during the consultation period varied. That being said, a number of key issues were identified as follows:

### 5.1.1 Clarity

The need for greater clarity was identified in relation to several aspects of the Plan and Environmental Report (ER). In particular, the notion of maximum wave height required explanation, insofar as it needed to be clarified that the wave heights quoted within the Plan are those at the shoreline, as opposed to deep-sea wave heights, and are thus depth limited. Clarification was further required in relation to the depth of the Plan Area inland. Whilst this was noted in the ER as being a minimum of 1km inland of the coastline, this was not elucidated within the Plan. This issue has been subsequently amended. Finally, clarification was sought with regard to the extent of implementation of proposed policy within policy units. It was noted that it was unclear as to whether proposed policy would be implemented throughout the relevant policy unit or solely in relation to those areas which would justify the use of the policy. Further detail was subsequently provided in the Plan which noted that the proposed policy provided an indication of the most appropriate approach towards shoreline management within a given unit. That said, the approach outlined is one of generality and thus the most appropriate measures with regard to specific sites will depend on the issue at hand, and upon the technical, environmental, social and economic circumstances which surround it.

### 5.1.2 Information

The approach taken towards the development of the Plan, with regard to the information which was used in relation to its formulation, was both commended and criticised, and a range of suggestions relating to the use of further information was provided. An example of this relates to the use of Natural Environment Research Council's (NERC's) Greening the Grey document to inform the development of coastal defence infrastructure subsequent to the implementation of the Plan. A further example relates to the need to make specific reference to SEPA's indicative flood maps within the ER, with regard to the flood risk context along the shoreline.

The need to acknowledge the limitations of the information which was used to compile the Plan was also identified. For example, the Dynamic Coast: Scotland's National Coastal Change Assessment (NCCA) was used to inform the Plan. One of the limitations of this assessment is that it assumes no increase in erosion rates as a result of relative erosion risk where this has been managed in the past by way of defences. Another example relates to the use of SEPA's coastal flood maps which do not

consider the impact of wave over-topping upon flood risk. These comments were noted and the limitations of the data were acknowledged in the Final Plan.

### **5.1.3 Detail**

Concern was expressed with regard to the level of detail into which the Plan went. This was particularly the case with regard to the use of coastal process information within the Plan. For example, it was expressed that the Plan did not adequately consider the interconnectedness of the coast and hinterland and the impact which this might have upon coastal processes and thus management approach. Another example related to a comment received which expressed concern for the extent to which modelling was undertaken and the extent to which it informed the management policies proposed. While this was acknowledged, the presumption on which the Plan was developed was that it would be based on existing information and knowledge (including that developed by way of modelling) without extensive recourse to new studies or research. No new detailed modelling was thus undertaken as part of the Plan.

### **5.1.4 Climate Change**

Criticism was received which suggested that a narrow view of climate change, one which does not adequately consider future changes to wave height and sediment movement, was undertaken during the development of the Plan. While this was acknowledged, the presumption on which the Plan was developed was that it would be based on existing information and knowledge without extensive recourse to new studies or research. Hence the effects of climate change could only be assessed to the degree that they had in the informing studies.

### **5.1.5 Policy Development/Approach**

It was alleged that whilst the Plan takes into account the high-level impact of proposed policies upon tangible assets such as people, properties and material assets, it fails to consider intangible assets such as objectives relating to land use, landscape and the built and natural environment. This, it was claimed, results in an approach towards policy which focuses upon what is going to be built as opposed to what is trying to be achieved – i.e. integrated and sustainable shoreline management. This is incorrect as the plan and its associated policies were developed on the basis of what high level measures to manage the flood and erosion risk could be sustained from a geomorphological viewpoint without incurring unacceptable impact on landuse, and the environment with little reference to what measures might actually be implemented and only passing reference to economic considerations. The setting of policy for each policy unit was also heavily influenced by the input of strategic planners from North and South Ayrshire thus ensuring that the intangible aspects were given adequate consideration at this key stage of the process.

### 5.1.6 Localised Issues

A number of issues, such as the flooding of local road and rail infrastructure and the erosion of cultural heritage features, were highlighted. Furthermore, clarity was sought in relation to many localised issues, such as flooding to individual properties. The information which was received with regard to localised issues was acknowledged however it was not always possible to address these comments within the Plan and ER due to the strategic level of these documents. The policies which were proposed to manage the shoreline were reconsidered in light of all new information, although only this resulted in a change in only one policy unit.

### 5.1.7 Economic Justification

The economic justification for the implementation of proposed policies was queried. This was particularly the case with regard to those areas in which extensive defences may be required despite few assets being at risk. Whilst this is an important issue, it was considered to be beyond the scope of the SMP as there are many ways in which shoreline management measures may be funded. The focus of the SMP was to establish what policies might be permissible in terms of coastal processes and environmental impacts, with only passing reference to economic justification. Economic appraisal of management options requires detailed knowledge of actual measures proposed in order to undertake the necessary cost/benefit assessment. Thus this will be addressed where further study is pursued and measures are to be progressed to optioneering, design and construction.

### 5.1.8 SMP Review

Finally, the Plan concludes by stating that:

*“The Ayrshire SMP should be reviewed in six years (2023) in order to assess if policies and actions proposed are still appropriate”*

It was commented that this statement suggests that there is little confidence in the policies proposed, given that it is the intention of the SMP to provide an approach to shoreline management which extends over the next 100 years and beyond, developed from a good and argued understanding of the coastline and coastal processes. This is incorrect; the coastline and human interaction with the coastline is constantly evolving as is the understanding of the implications of climate change. Hence it is entirely prudent that a strategic document such as the Ayrshire SMP is reviewed frequently in order to account for these changes. The suggested frequency of 6 years is associated with the typical review period for strategic development plans which the SMP is intended to inform, and was selected to ensure that the policies of the SMP are current when these documents are reviewed.

## 6 NEXT STEPS

The submissions, observations and comments received through the consultation activities described in this document were taken on board, where appropriate, during the finalisation of the Ayrshire Shoreline Management Plan. It is envisaged that the final Plan will be published in autumn 2018 and will be available on the North Ayrshire and South Ayrshire Councils respective websites.



# **Appendix A**

## **Stakeholder Register**

Organisation	Name	Position	Group
NAC	Russel McCouchen	Head of Service	SG
SAC	Stewart Turner	Head of Services	SG
NAC	Jim Montgomery	Elected Members	SG
SAC	John McDowall	Elected Members	SG
NAC	Arthur Cowley	Team leader	SG/TG
SAC	Stevie McCassirty	Senior Officer	SG/TG
NAC	Patricia Rowley	Flooding Officer	SG/TG
SAC	Scott Greig	Supervisory Engineer Bridges	TG
NAC	Andrew McNair	Strategic Planner	TG
SAC	Neil Feggans	Strategic Planner	TG
NAC	Alistair Allan	Biodiversity Officer	TG
SAC	Fiona Ross	Biodiversity Officer	TG
SEPA	David Scott	South West	SG/TG
SEPA	Kat Ball	Senior Policy Officer	SG/TG
SEPA	Kirsty Jack	Senior Specialist Scientist (Strategic Flood Risk)	SG/TG
SNH	Dr Alistair Rennie	Coastal Erosion Coordination and Research Manager	SG/TG
SNH	Nick Everett	Coastal Erosion Coordination and Research Manager	SG/TG
SNH	Graeme Walker	Area Manager West of Scotland	TG
RSPB	Jim Densham	Senior Landuse Policy Officer	SG/TG
Historic Scotland	John Raven	Heritage Management Team Leader West	SG/TG
Firth of Clyde Forum	Fiona Mills	Project Manager	SG/TG/CG
Scottish Water	Gillian_Crighton	SW Strategic Flood Risk	TG
Transport Scotland	Anthony Black	Area Manager West of Scotland	TG
Network Rail	Sandra Hebenton	Town Planning Manager	TG

Hunterston	Nikki Thomson		CG
Largs Golf Club			CG
Routenburn Golf Club			CG
West Kilbride Golf Club	Graham Mackenzie	Managing Secretary	CG
Auchenharvie Golf Course			CG
Studio Golf Ayrshire			CG
Irvine Bogside Golf Club			CG
Gailes Link			CG
Western Gailes Golf Club	Douglas Zuill	Club Manager	CG
Dundonald Links			CG
Kilmarnock (Barassie) Golf Club	Claire Middleton	General Manager	CG
Troon Yacht Havens			CG
Darley Golf Course			CG
Fullarton Golf Course			CG
Lochgreen Golf Course			CG
Royal Troon Golf Club	Stephen Anthony	Secretary	CG
Prestwick Golf Club			CG
Prestwick St Nicholas Golf Club			CG
Prestwick St Cuthbert			CG

Dalmling Golf Club			CG
Seafield Golf Course			CG
Belle isle Golf Club			CG
Trump Turnberry Ailsa			CG
Girvan Golf Course			CG
Brodick Golf Club			CG
Futurescape	Toby Willson	Conservation Officer (Central Scotland)	CG
Ayrshire River Trust	Stuart Brabbs	Trust Manager	CG
National Farmers Union	Christine Cuthbertson	Area Officer	CG
Community of Arran Seabed Trust			CG
Whiting Bay and Districts Improvements Association	Lesley Wood	Treasurer	CG

# **Appendix B**

## **Consultant and Client Contacts**

## Consultant Contacts: (RPS)

Name	Role
Andrew Jackson	Project Director
Malcolm Brian	Project Manager
Adrian Bell	Coastal Processes Lead
Richard Bingham	SEA Lead
Danielle King	SEA and Communications

## Client Contacts:

Name	Organisation
Patricia Rowley	North Ayrshire Council
Neale McIlvanney	North Ayrshire Council
Andrew McNaire	North Ayrshire Council
John Hutcheson	North Ayrshire Council
Adrian Brown	South Ayrshire Council
Neil Feggans	South Ayrshire Council
Scott Greig	South Ayrshire Council
David Scott	SEPA

# **Appendix C**

## **Event Information**

Monday 19<sup>th</sup> February 2018

Venue	<ul style="list-style-type: none"><li>Irvine Library</li></ul>
Time	<ul style="list-style-type: none"><li>12:00 – 19:00</li></ul>
Notes	<ul style="list-style-type: none"><li>Parking at the rear</li></ul>

Tuesday 20<sup>th</sup> February 2018

Venue	<ul style="list-style-type: none"><li>Millport Library</li></ul>
Time	<ul style="list-style-type: none"><li>12:00 – 18:50</li></ul>
Notes	<ul style="list-style-type: none"><li>In room next to coffee shop</li></ul>

Wednesday 21<sup>st</sup> February 2018

Venue	<ul style="list-style-type: none"><li>Ardrossan Civic Hall</li></ul>
Time	<ul style="list-style-type: none"><li>12:00 – 18:50</li></ul>
Notes	<ul style="list-style-type: none"><li></li></ul>

Thursday 22<sup>nd</sup> February 2018

Venue	<ul style="list-style-type: none"><li>Arran Library (Brodick)</li></ul>
Time	<ul style="list-style-type: none"><li>12:00 – 18:50</li></ul>
Notes	<ul style="list-style-type: none"><li>Last Ferry leaves at 19:20</li></ul>

Friday 23<sup>rd</sup> February 2018

Venue	• Largs Library
Time	• 12:00 – 17:00
Notes	•

Monday 5<sup>th</sup> March 2018

Venue	• Prestwick Library
Time	• 14:00 – 18:00
Notes	•

Tuesday 6<sup>th</sup> March 2018

Venue	• Carnegie Library
Time	• 14:00 – 18:00
Notes	• In the foyer

Wednesday 7<sup>th</sup> March 2018

Venue	• Girvan Library
Time	• 12:00 – 13:00 and 14:00 – 17:00
Notes	• In the foyer

Thursday 8<sup>th</sup> March 2018

Venue	<ul style="list-style-type: none"><li>• Troon Library</li></ul>
Time	<ul style="list-style-type: none"><li>• 14:00 – 18:00</li></ul>
Notes	<ul style="list-style-type: none"><li>• In the foyer</li></ul>

## **Appendix D**

### **Consultation Comments Received in Relation to the Plan**

Respondent	Pg.	Para.	Comment	Response / Action
Low Green and Ayr Seafront Trust	One	3 - 9	Any policies based on such a flawed understanding must themselves be flawed... (said in relation to 1 in 200 year approach)	This is the standard approach for developing SMPs as set out in associated guidance, therefore no modification of SMP required
Low Green and Ayr Seafront Trust	One	10 - 13	There is no mention of the difference between Chart Datum (CD) and Ordnance Datum (OD). Understanding this is crucial to determining the finished flood level of development on the Ayrshire Coast... Twice a day high tide exceeds OD by about 1.6 to 1.7 metres.	Finished floor levels are not quoted in the SMP. No modification of SMP required.
Low Green and Ayr Seafront Trust	One	16 - 17	We have been unable to find any mention of the Coast Protection Act 1949. This, amongst other things gives the Coast Protection Authority the power the levy compulsory 30 year mortgages of 'benefited properties' to pay for 'coast protection works'. We feel that a draft shoreline management plan should have mentioned this instead of fudging the costs of such protection works 'to be determined in the future'.	There are numerous funding mechanisms available to implement individual measures, to single out one for mention in the SMP would be incorrect therefore no modification of SMP required.
Low Green and Ayr Seafront Trust	Two	4	Given that the rivers Ayr and Doon flow into Ayr Bay along with the Slaphouse Burn we feel mention should have been made of the obvious that river mouths provide entry points for the sea as well as existing points for excess fresh water.	The entry of tidal flood waters via river mouths is addressed in the SEPA flood maps that inform the risk assessment for the SMP. No modification of SMP required.
Low Green and Ayr Seafront Trust	Two	5	We point out that a draft shoreline management plan must go a bit inland beyond the high tide limit of the major drains of the area to provide a comprehensive plan for the protection of the Ayrshire coast.	The SMP study area includes all lands up to 1km inland from the coast and associated estuaries, No modification of SMP required.
Low Green and Ayr Seafront Trust	Two	6 - 7	In the 1950s the sand on the beach had a level gradient to the sea at the old coastguard look out at the battery. Today it does not. What has caused this accretion of sand over time? ...	The net northward movement of sediment along the coastline at Ayr is interrupted by the presence of the harbour walls trapping sediment on the southern side. How this has changed since the 1950's is not known but the observations are in line with the

				information on which the SMP policy is based. No modification of SMP required.
Low Green and Ayr Seafront Trust	Two	8	We note that in Appendix D page D-21 the table heading states ' The maximum wave height during a force 8 storm was found to be less than 1.0m' but no wind direction is given or fetch distance...Given everything we have stated above we feel that the authors of the report have no idea what a one metre wave looks like.	A range of wind directions were considered and the maximum near shore wave height observed during a force 8 gale is quoted. No modification of SMP required.
Low Green and Ayr Seafront Trust	Two	11	We feel that the draft plan is more or less correct as far as it goes, but does not go nearly far enough to help the coast protection authorities formulate cogent policies with respect to coastal flooding and associated risk.	Statement, no action required as the SMP has been developed in accordance with standard guidance.
McKelvie	One	2	I would like more information to understand why the 'minor roads at Kildonan' which are already affected by wave overtopping and erosion are ignored. Is it considered uneconomic to protect the coastal road given it only provides access to the properties located on it?	This is a local issue, the SEPA flood maps do not include over-topping and the NCCA methodology will only show erosion where there has been an observable change in the position of the high water mark, hence some local issues may not be depicted. These comments are useful and should be kept in mind should a more detailed local study be progressed.
McKelvie	One	3	Are you able to identify which single residential property is considered to be at risk of coastal flooding? Given that the dot on the map makes it appear to be either Little Mill or the nearby cottage, I am surprised that the nearby cottages of Brooklet and Streamlet have not also been identified as such.	The SEPA mapping is not intended to identify individual properties, a more detailed local study would be required to confirm flood risk to individual properties, therefore no modification of SMP required.
McKelvie	One	3	Are you able to clarify if this is because the survey did not extent along the track past Little Mill to the other properties?	The mapping was produced by SEPA and is based on modelling not survey. No modification of SMP required.

Clyde Marine Planning Partnership	One	1	The SMP should include reference to the development of the Clyde RMP, either within Section 8.1 'Application of the SMP in Spatial Planning' or Section 8.2 'Further Actions to facilitate medium/long term policies' from page 257 of the SMP.	SMP text modified to include a reference to coordination with the Clyde RMP.
Clyde Marine Planning Partnership	One	3	In section 7.1.1 General Mitigation, we support the concept that 'where feasible, natural flood management and soft/green engineering methods should be incorporated into the detailed planning to reduce the negative environmental impacts of any scheme'. We would draw your attention to a NERC funded study, entitled 'Greening the Grey', which has recently been completed and includes a section on coastal and estuarine Integrated Green Grey Infrastructure.	Noted for the next stages of detailed study.
Questionnaire 5	3	Q1	Clauchlands Road, between Brodick Road and Oakbank occasionally submerged by HWST with strong southerly winds.	Noted for the next stages of detailed study.
Questionnaire 5	4	Q4	I feel existing sites, generally, should be maintained by any new build and approach roads should be constructed well back from and above the shore.	Noted
Questionnaire 4	4	Q4	Lots of plastic debris washes up on the beach from the mainland (Tesco milk cartons). More effective beach cleaning and maintenance from NAC. Sewage outfall on the Fisherman's Walk (just past the concrete bridges) should be dealt with. Very smelly in the summer months.	Recommendation noted by NAC.
Questionnaire 3	3	Q1	Machrie is continuously losing ground to the sea, particularly in the winter. The road is at risk.	Noted for the next stages of detailed study.
Questionnaire 2	3	Q1	Portencross Castle is built on discontinuous sandstone – evidence of recent rock discontinuity collapses, possibly arising from inter-tidal wave action – risk of losing this	Recommended policy is hold the line, therefore no change required.

			historically important ancient scheduled monument unless some protection is undertaken.	
Questionnaire 2	3	Q2	I would like to see clear standards applied to coastal defences e.g. rock armouring, to ensure that rock does not become gravel over time and to ensure that builder's rubble cannot be used for this purpose.	Recommendation noted by NAC and SAC for future working, however beyond the scope of this SMP.
Questionnaire 9	4	Q10	High spring tides and strong southerly winds increase the average tide height in the Firth of Clyde.	Noted and already accounted for in the underlying datasets on which the SEPA flood maps are based.
Questionnaire 9	4	Q12	Chapter 6 of the draft SMP is fundamentally okay but any works proposed need to be blended with the environment and less heavy handed on the 'urbanisation' of the coast.	Noted for the next stages of detailed study.
Questionnaire 13	3	Q11	Does not agree with the proposed policies presented in Chapter 5 of the draft SMP – Would like to see a building wall chestnut fence around sand dunes to protect reeds from being swept away and loss of sand by gale force wind and wire mesh layer to hold reeds in place.	Noted for the next stages of detailed study, however is too detailed for SMP level of assessment which does not propose measures.
Questionnaire 13	3	Q12	Does not agree with the action plan presented in Chapter 6 of the draft SMP – Would like to see seaweed recycled and other trash should be removed and the shoreline protected from fires in summer beach bins should be provided. A path should be laid to allow access along the beach.	Recommendation noted by NAC and SAC for future working, however beyond the scope of this SMP. The comment relates more to environmental management issues than management of the coast to protect against flooding and erosion. Please note that Mechanical Seaweed removal can actually be a contributory factor in coastal erosion.
Questionnaire 13	3	Q13	Sewerage problems have not been addressed from raw sewerage pipe outlet at beach.	The SMP is intended to set policy for dealing with erosion and flooding not water quality and waste water treatment.
Questionnaire 14	3	Q13	Regarding the hold the line conclusion for Cumbrae a lay person could have identified that areas most at risk i.e. Balloch Bay and the north end of the island. Money should be spent on schemes rather than consultants and consultations.	Requirements for an SMP come from the Local FRMP. Process to be undertaken to ensure management of the shoreline into the long term is well planned to be effective and sustainable.

Questionnaire 22	44	Q10	According to the Flood Defence Consultation my road is at risk	No information as to what road is at risk so unable to review within SMP. Flood and erosion risk to transport infrastructure included within SMP and appropriate policies proposed to protect such assets wherever feasible.
Questionnaire 23	46	Q10	Road access to my home from the A78 is liable to coastal flooding. The A78 is often closed between Skelmorlie and Largs. Rail line from Kilwinning to Saltcoats is often closed due to sea conditions. Ardrossan harbour is frequently closed to shipping due to wind and sea conditions as is Largs slipway and Wemyss Bay Pier.	Noted for the next stages of detailed study. No modification of SMP required
Questionnaire 23	45	Q11	Whilst I agree with the principles of the policies the timescale needs to be advanced as conditions on the coast are already causing many difficulties and need attending to now.	Statement Noted.
Questionnaire 23	45	Q12	Too little immediate action. The A78 needs rerouting, rail line Kilwinning-Saltcoats needs re-routing, new all-weather port for Ardrossan ferries needed, new terminals for Cumbrae and Rothesay ferries needed. Arran circular road realignment needed in places. A77 needs to be rebuilt away from shoreline.	Statement noted for the next stages of detailed study.
Questionnaire 24	3	Q10	The local council recognised the risk of erosion in sub-cell 2 as in the 1980's and installed gabions to protect this shoreline. There is now evidence of marked erosion which has been assessed as 'high priority' in the draft SMP study, a part of which has recently been repaired leaving the area towards the Cuddy Dook vulnerable.	Statement noted for the next stages of detailed study. Policy is to hold the line in this area.
Questionnaire 24	3	Q13	Lamlash bay is both a Marine Protection Zone and a popular holiday village with many water based activities. Part of the sub-cell A2.1 was previously a land fill site and the increasing erosion will inevitably contaminate	Statement noted and SMP text updated to reflect this better.

			the bay with hazardous waste.	
Questionnaire 25	3	Q10	2010 – After some years of deterioration, the gabion sea defence north of the Benlister Burn, Lamlash (locally known as Tennis Court Road) finally collapsed leaving the hinterland, an old Council landfill site, open to exposure and leakage into the sea there being no other form of containment. This area of Lamlash Bay is now a Marine Protected Area.	Statement noted for the next stages of detailed study. Policy is to hold the line in this area.
Questionnaire 25	3	Q11	While I agree with the intervention categories and pleased to see in Table 6.12 that Policy Unit A2.A has been given 'High Priority' I would like to see a further category within the short term period 0-20 years possibly headed 'Urgent', 'Immediate' or 'Top Priority' where an area (as in Q10 above) can be especially highlighted to receive funding should that become available. A possible 20 year wait is just too long to contain the detritus of yesteryears.	Prioritisation within the short-term period will be undertaken by the responsible agencies, some areas may see works in a very short timescale if they can be justified whereas others may take longer to resolve.
Questionnaire 26	3	Q10	Erosion of the landward part of the intertidal area has resulted in a significant reduction in the amenity value of the foreshore at Fairlie.	Comment noted for the next stages of detailed study. This is something that could be relevant if measures are being progressed for this area
Questionnaire 26	3	Q11	For cell 6b1.2 the policy should be to advance the line. If undertaken by beach nourishment/replenishment utilising the sand accumulating to the south of the causeway the amenity value of the beach can be greatly improved. Raising the bed level of the foreshore will reduce water depths and reduce storm wave flooding by causing north-west and west waves to break further from the property line.	Beach nourishment is an acceptable measure under a hold the line policy as applied to this policy unit.
Questionnaire 26	3	Q12	The action plan is deficient in failing to identify and give consideration to the southern part of cell 6b1.2 in Table 6.1. The	Beach nourishment is an acceptable measure under a hold the line policy as applied to this policy unit.

			policy in this length should be to advance the line with study being undertaken of beach nourishment/replenishment using existing marine sand sources.	
Questionnaire 26	3	Q13	<p>My responses to Q1, 2, 3 and 4 relate to that part of cell 6b1.2 extending north from the mouth of the Glen Burn to Allanton Park Terrace, Fairlie. In 1974 a causeway was constructed as the landward part of the approach to the Hunterston Deepwater Jetty. The causeway extends across the intertidal area to approximately the line of MLWS. The causeway interrupted the south to north movement of sand along the Southannan and Fairlie Sands. Over the last 30 years this reduction in northward sand has resulted in a significant (up to 1m) reduction in the level of landward part of the intertidal area between the Glen Burn mouth and Allanton Park Terrace. The reduction in wave action resulting from the shore being relatively sheltered from the prevailing south-west winds in conjunction with the much reduced sand supply has also caused a steepening of the upper part of the beach. The changes arising from the causeway construction have resulted in a reduction of storm wave flooding, but importantly for Fairlie have greatly changed the nature of the foreshore. Where formerly medium to coarse sand formed the beach it now comprises of gravel, cobbles and broken rock. The beach is therefore must less attractive as a recreational amenity for villagers and visitors than was the case up to the causeway construction. Visual observation, confirmed by Peel Ports bathymetry, shows an extensive accumulation of marine sand on the south side of the causeway. Together</p>	<p>Southannan Sands is acknowledged as a sediment sink in the SMP. The recommended policy for 6b1.2 is to hold the line for which beach nourishment is an acceptable option provided it can be justified financially and is environmentally acceptable.</p>

			with the reduction in beach levels to the north this is clear evidence of the causeway's impact on the littoral drift. The ES fails to identify the historic lowering of the intertidal sands in cell 6b1.2, the steepening of the foreshore, the increase in sediment size and the loss of shoreline amenity. All of the foregoing could have been identified if RPS had consulted with local communities and gained the benefit of experience of those who have lived in the area for many years and observed the changes.	
SEPA	1	3	It would be useful to have a headline summary of risk (and how risk changes in the future) upfront in the document so as to set the risks in each policy unit into context and provide an overall context for the level of risk identified in this SMP in comparison to national coastal risks.	Summary included in SMP
SEPA	1	4	Note properties are quoted in precise numbers - consider rounding to reflect uncertainty as in the SEPA Flood Risk Management Strategies.	Property numbers in SMP rounded to multiples of 5
SEPA	1	5	Not seen computational modelling - no objection to it being used to define management units.	Statement, no action required
SEPA	1	6	The SMP uses the NCCA outputs to assess erosion risk. There are limitations of the NCCA including that it assumes no increase in erosion rates as a result of relative erosion risk where this has been managed in the past with defences. In a number of locations, local knowledge appears to have identified significant erosion where the NCCA did not identify any. It may be prudent to make reference to SNH project also - it was done, I believe by Glasgow University on behalf of the Scottish Government (the SG project officer was seconded from SNH).	SMP text updated to include more reference to uncertainties in underlying data.

SEPA	1	7	Similarly, the limitation of SEPA coastal flood maps should be noted (i.e. no consideration of wave overtopping). In some locations wave overtopping will be an important contributor to flood risk which is not reflected in the flood maps.	SMP text updated to include more reference to uncertainties in underlying data.
SEPA	1	8	Where hold the line policy is set, it is not clear whether this is for the whole policy unit or whether it may be only able to be applied in part of the policy unit- e.g. urban areas.	SMP text modified to try to make it clearer that policies do not necessarily apply universally throughout a policy unit.
SEPA	1/2	9	Notes in several places that Scottish Water assets are at risk. Have they been consulted and are they aware of risk. In areas where the Scottish Water asset is a significant proportion of the risk, do they agree that hold the line is the correct policy or would they prefer relocation?	Yes, see Scottish Water responses below.
SEPA	2	10	Page 65 - states that hard protection (structures) have short life spans. This is not correct as these are usually designed/constructed to last 50 to 100 years which is more long lasting than soft interventions (e.g. beach recharge) in most scenarios.	SMP text modified to reflect this better.
SEPA	2	11	We would query if there is sufficient consideration of potential climate impacts on designated habitats at the coastline. In most other SMPs we are familiar with, coastal squeeze is a prominent climate change impact where holding the line results in a narrowing of the intertidal area and hence loss of designated habitat... Coastal squeeze is one of the main drivers of managed realignment proposals in other SMPs. Statement in policy unit 6B1.1 and many others identifies no significant impact to amenity etc. by holding the line suggesting that coastal squeeze is not considered to be an issue.	SMP and SEA reviewed in this context

SEPA	2	12	In 6b2.2 the policy is advance the line. Whilst this seems like the correct policy, I don't understand why (especially in combination with sea level rise) that this does not result in impacts on the Southanan Sands SSSI. Might have expected a loss of beach area especially in longer term.	SEA / SMP text reviewed to reflect these potential impacts better.
SEPA	2	13	Surprised that there is not more reference in the plan to adaptation especially in those area where there are few assets at risk (and yet hold the line has been set as preferred policy)/	SEA / SMP text reviewed. Note text amended within SMP to clarify the definition of the hold the line, which will only be done in specific areas where risk is identified. Otherwise the management is no active intervention.
SEPA	2	1	The SMP should identify the best policy to manage flood and erosion risks in the long term (based on coastal processes and not necessarily constrained by economics). There is however significant benefit in understanding the likely economic situation in which the policies will be implemented which helps to sense check our ability to deliver what is in the plan. For example in policy unit 6c2.2, no assets are identified to be at risk but, despite this, a hold the line policy is set which has a possible need for defences in 2nd epoch identified. In reality it is difficult to see how the hold the line could be implemented in this case which brings into question whether the preferred policy is appropriate / deliverable.	Comment noted. There is insufficient detail is available to undertake a cost/benefit analysis for each policy unit. SMP text modified to try to make it clearer that any measures will be subject to CBA before implementation.
SEPA	2	2	Maintenance activities (of existing defences) are noted as existing expenditure and therefore not subject to scrutiny as to whether viable in the future or not. Many of the defences will be reaching the end of their life within the first and second epochs and will need to be replaced in order to continue to provide current levels of protection. It would also be expected that in many cases, maintenance costs will increase with sea	See comments above about economic justification for any measures.

			level rise and associated reduction in protective beach / intertidal area. Appreciate there will be economic benefits likely provided by the defences which are not accounted for, but should the SMP not challenge maintaining existing defences especially when they will likely need major replacement / repair works with the plan timeline?	
SEPA	3	3	<p>If you take the first cell, 6b1, there are AADs of £146k. That's how much could be spent on the whole coastline of 35km. Total damages are £4.4 million over 100 years. If the defences are only required in short sections where the main benefits are then it looks feasible that maintenance plus limited extension to existing defences and raising defences to accommodate climate change may be economically feasible. But if its saying that the policy for the whole unit is hold the line and if significant parts of that need defending, then the available money does not go far. I can see that there may be justification to protect the road where it is at risk as it's a key route (and unless relocation is viable) regardless of high level economics and also its viable to protect built up areas where the benefits are generated. But is it really viable to have hold the line for the whole 35 km of shoreline? It may be viable to hold some parts and do nothing in others but the current policy expectation is that the whole shoreline will be protected if required. "The policy identified for each policy unit within sub-cell 6b1 is hold the line. In each policy unit this is likely to consist of maintaining and extending existing defences in the short-term, and constructing new defences in the medium to long-term as required". Would it be more realistic to state</p>	See note above about policy not necessarily extending to measures over full extent of policy unit.

			that hold the line applies to the A78 as a key transport route plus Largs as the location generating the benefits (if that's correct assumption) with do nothing for the remaining 35km. Just concerned that the present statement seems to commit the council to hold the line along the whole coast in this unit which may not be practical.	
SEPA	3	4	<p>Policy Units Sub-cell 6b2 has been divided into two policy units:</p> <ul style="list-style-type: none"> <li>• 6b2.1 Hunterston</li> <li>• 6b2.2 Hunterston to Farland Head</li> </ul> <p>Policy unit 6b2.1 contains multiple assets at risk of flooding and erosion while Policy unit 6b2.2 contains no assets at risk. Maybe no issue with economic case for 6b2.1 given it's a strategic site under national planning framework (despite assessment that potential benefits are £31k whilst the study alone cost £100k). But would question why its hold the line for 6b2.2. There are no assets at risk so why suggest it may be required to construct coastal defence assets? In the impacts table do nothing would appear to also achieve no loss of property (some land may be lost?) and would have no adverse impacts on the other criteria and would be free of cost. So why not do nothing?</p>	SMP text for 6b2.2 reviewed, boundary of 6b2.2 moved slightly southwards to clear power station site and policy changed to no active intervention.
SEPA	3	5	Purely on economics, there appears to be little justification for intervention in some of the other areas and indeed if cost of maintaining defences were taken into account, there would be a saving. E.g. 6c6.2 seems to have little economic justification given it has an AAD of £19k for the whole of 6c6. Likewise 6c1 only has potential benefits of £8.7k AAD yet has a hold the line policy requiring maintenance of existing defences possibly new / extended defences in the	Economics are not necessarily the only drivers for measures to be implemented, but point is noted and will be considered further at the next detailed stage of study. Please note previous comments that policy will only refer to the area of risk and not the entire stretch of shoreline.

			future.	
SEPA	4	6	So I guess my main point of the economics is that it is not always apparent from the appendix and document what the justification is to hold the line where the economic arguments do not stack up. A default do nothing in these cases with words to note that locally small scale defences may be justified feels more sensible and will not leave the Council open to getting hit over the head with an SMP which has hold the line policies where the Council or other cannot justify or afford to do so.	The decision was taken by NAC and SAC that it is preferable to present a policy of hold the line in some places, which allows for either active management or no active intervention.
Scottish Water		Q1	<p>There are some significant Scottish Water Assets that may be at risk as a result of coastal erosion and these include:</p> <ul style="list-style-type: none"> <li>• Ardrossan WwPS – NS226419</li> <li>• Saltcoats WwPS – NS252412</li> <li>• Stevenston Point WwPS &amp;WwTW – NS275404</li> <li>• Irvine Beach Park WwPS – NS312374</li> <li>• Barassie WwPS – NS326338</li> <li>• St Andrews WwPS – NS344279</li> <li>• Prestwick Esplanade WwPS – NS345268</li> <li>• Girvan WwTW – NX190999</li> </ul> <p>This list is by no means conclusive, but names the main significant assets that SW are aware of at this stage and further point with regards to use of GIS data should be given consideration.</p>	Noted, major SW assets are believed to already be included in the underlying SEPA and NCCA risk evaluations. This information will also be considered further at the next detailed stage of investigation.

Scottish Water		Q2	No significant objections in principal to the proposals as they are currently presented in chapter 5. Where it is proposed to have "managed realignment" or "advance the line", Scottish Water should be consulted in advance of any works to confirm that there is not water or sewerage apparatus which could be affected in accordance with the provisions of Sewers for Scotland and Water for Scotland 3. Local Authorities should have access to Scottish Water GIS data but this can be obtained from Scottish Water on request and in accordance with current public utilities guidance and practice.	Comment noted for future working.
Scottish Water		Q3	No significant objections in principal to the proposals as they are currently presented within the chapter 6. As with the proposals detailed in chapter 5, Scottish Water should be consulted on any alterations within the proximity to existing water and sewerage apparatus in accordance with current public utilities guidance and practice.	Comment noted for future working.
SNH	1		We would encourage the promotion and adoption of soft protection measures in areas where the natural heritage interests are dependent on active coastal processes. This is particularly important where the features of conservation importance are directly linked to the mobile habitats of a dune frontage.	Recommendation noted for future working.
SNH	2		Policy Unity 6B1.1 Skelmorlie to LargsThe hold the line policy would involve coastal defences being upgraded and extended. The might permanently obscure or damage notified rock outcrops of Largs Coast Section SSSI, much of which directly adjoins the existing defences for the A78 road. Therefore the SEA (p52) should conclude Significant impacts on Biodiversity, rather than 'no significant impacts'. Suitable mitigation for	In the assessment it was concluded that no encroachment on the SSSI was anticipated and therefore no significant impacts anticipated. Text amended in Environmental Report to reflect this. Agreed that a site specific approach is recommended.

			existing defences could involve restricting works to the existing footprint. Mitigation for defence extensions might be to only allow obscuring or damage to parts of the rock sequence that are adequately represented elsewhere in the SSSI. A site specific approach is recommended.	
SNH	2		Policy Unit 6B2.1 Hunterston - It's important to note that although the policy is titled Advance the Line, the actual wording is allow the existing line to be advanced. This highlights the fact that such land-claim would be for industrial expansion (NPF site), rather than being necessary for managing flooding or erosion. It should be noted that while the NPF2 promoted industrial development, it also requires that the interests of the protected site were taken into account and that impacts should be mitigated.	Comment noted
SNH	2		Policy Unit 6B2.1 Hunterston - As no details of the proposals are given, the land claims and developments of the last 50 years are a dominant control on the tidal flats, the statement 'extending....existing defences... will have minimal impact on the sediment regime' seems unjustified (SMP p81). It is also contradicted by the SEA (p58 Geology Soils Etc.) identifying 'potential impact on the natural processes and...sediment transport within.... Southannan Sands SSSI". New land-claim could indeed convert some notified sandflat to mudflat, and permanently remove some. Therefore, in the SEA (p57), a Significant impact on Biodiversity is more appropriate than the Moderate given, and would be in line with our SMS. The proposed 'detailed process modelling' is not in itself mitigation; to devise on-site mitigation may be very difficult.	SMP and SEA text checked and revised for consistency. Potential impacts biodiversity, flora, fauna and natural heritage amended to significant as recommended.

SNH	3		Policy Unit 6C2.4 Gales Burn to Troon. The reference to South Ayrshire Council undertaking dune restoration work in this area (p107) should also be discussed in section 3.5 as it is a relevant part of the baseline condition.	SMP text updated to reflect this.
SNH	3		Policy Unit 6C4.1 Ayr to Greenan Castle. The blanket Hold the Line policy is ambiguous. The proposal is to improve/extend existing defences North of the River Doon, but it is unclear whether this rules out new defences for the currently dynamic coastal habitats which could be adversely affected by defences measures, both within and outwith Maidens to Doonfoot SSSI. No Active Intervention may be appropriate here, either through a composite policy for the unit, or by moving this area into unit 6c4.2. Alternatively, if there are reasons of flood and erosion management to Hold the Line between Greenan Castle and the River Doon, these should be explained.	This is clarified by the modification included to address the SEPA comment about a policy not necessarily applying across the whole policy unit.
SNH	3		Policy unit 6d1 South Ballantrae to Currarie Port. The complex gravel barrier that lies mostly within Ballantrae Shingle Beach SSSI plays a major role in flood- and erosion-risk management. The No Active Intervention policy is welcome, but as the policy unit boundary is halfway along the barrier, the northern part of the beach is technically subject to Hold the Line per 6C6.3. Moving the boundary north to the harbour headland would acknowledge the importance of unconstrained coastal processes to the SSSIs notified shingle habitat, recognising the headland as a significant barrier to longshore transport.	Comment noted and policy unit boundary revised.

SNH	3		<p>Policy Unity 6d1 South Ballantrae to Currarie Port - The statement 'the effect of rising sea-level on this policy unit is expected to be relatively minor due to steep topography' is not justified (SMP p148). In fact, the village and farmland occupy a coastal terrace only 1m-2m higher than the gravel barrier, which therefore protects them. It is possible that sea-level rise will eventually roll the barrier inland, punctuated by unpredictable shifts in the River Stinchar mouth, altering the risks. Avoiding intervention with the barrier is likely to be the best way of maintaining its protective function. However, this might in the long-term require difficult choices about certain assets, and this issue must be raised in the SMP.</p>	SMP text reviewed.
SNH	4		<p>Policy Unit A1.3 Sannox to Brodick - The Hold the Line Policy (short term) would involve coastal defences being upgraded and extended. That might permanently obscure or damage notified rock outcrops of Corries Foreshore SSSI, within which there are various defences for the A841 road. Our advice at 6b1.1 also applies here.</p>	<p>Comment noted for future working and this will be assessed at the next detailed stage of study. It should be noted however that no significant impacts were anticipated for the rock outcrops of Corries Foreshore SSSI as there are no assets to be protected in the area of the designation, with the main risk at Sannox Bay.</p>
SNH	4		<p>Section 6 - Action Plan (Table 6.2) - I suggest a new Action for Unit 6b2.1 (Hunterston): undertake initial investigation of hydro-geomorphic effects of the proposed land-claim, especially on Southannan Sands SSSI. As the Advance the Line policy is driven by national infrastructure requirements, this should arguably be done pre-emptively rather than deferred to the EIA stage.</p>	<p>Recommendation noted for NAC and SAC to implement at the detailed feasibility stage.</p>

Campbell	6	1	There are set timescales for assessing risks but no criteria that would form the basis for that risk assessment. It is assumed that these criteria exist and have been adopted by the study team but there is no mention in the reporting.	The timescales for assessing risks are defined in various guidance documents and the project brief.
Campbell	6	4	Appendix B page B3 includes a list of stakeholders asked to comment on the outcome which in the case of Arran is in no way comprehensive and it is hard to understand how it was constructed. In any event, not much response was elicited from those who were consulted, a notable absentee from the list being the Lamlash Improvements Group.	A desktop search was carried out to determine key stakeholders within the area, this was reviewed and augmented by NAC and SAC to develop the list of stakeholders detailed in Appendix B. The Lamlash Improvements Group was not identified during this search but will be noted for future working in the next detailed stage of study.
Campbell	6	5	A notable omission related to Arran is that there is absolutely no reference to the island's dependence on its lifeline service ferry connection to the mainland and how vulnerable this might be in future to continued operation in the face of sea level rise and increasingly severe weather conditions.	The presence of the ferry terminal in Brodick is acknowledged within the Plan. The recommended policy for Policy Unit A1.4 that contains this asset is to hold the line and hence a presumption in favour of consenting works to maintain this asset.
Campbell	8		A coup on Tennis Court Road existed in two places: <ol style="list-style-type: none"> <li>1. Between the tennis courts and the Benlister Burn; and</li> <li>2. Along the old 'back road' to the Benlister Burn.</li> </ol>	This is noted, and the presence of a former landfill site has been acknowledged in the Plan. Recommended policy in this area is to Hold the Line.
Campbell	8		Who will be responsible for implementing and monitoring events and changes/implementation of the Plan?	Implementation of actions recommended in the Plan rests with a number of organisations, including asset owners and the Councils. Responsibility for monitoring and review of the Plan rests with the two Local Authorities.

## **Appendix E**

**Consultation Comments Received in Relation to the SEA**

Respondent	Pg.	Para.	Comment	Response / Action
HES	3	1	In noting the comments in Section 1.5 relating to the lack of a formal requirement to issue a Scoping Report we would simply clarify that under the Environmental Impact Assessment (Scotland) Act 2005) the issuing of a Scoping Report to each consultation authority is a formal requirement.	Environmental Report amended to reflect this better.
HES	4	1	Given the location of Greenan Castle you may wish to add a monitoring requirement to the SMP Action Plan for the cliffs supporting the castle to ensure that any issues are identified.	Recommendation passed to NAC and SAC. Reporting on erosion and land use is included within the Monitoring proposed in the SEA and adopted in the SMP, however this is at the Plan level with no specific features mentioned as indicators.
HES	4	2	While it is noted that no significant erosion issues are identified in the sub-cell 6C4 as a whole there may be localised issues for the scheduled monuments of Heads of Ayr, fort 1050m NNW of Genoch Fam (SM5594) and Dunure Castle and dovecot (SM6105).	Environmental report updated to reflect this comment. Councils to note in future detailed planning.
HES	4	3	As is noted that there are a number of localised coastal erosion on sections of Turnberry Castle (SM6183) nearest the sea, particularly the inlet to the east of the lighthouse. There is also evidence of erosion taking away some of the cliff at the most westerly point below the wall and railings enclosing the lighthouse. In view of the policy approach of NAI it will be important that these issues are monitored for further erosion.	Recommendation passed to NAC and SAC. Reporting on erosion and land use is included within the Monitoring proposed in the SEA and adopted in the SMP, however this is at the Plan level with no specific features mentioned as indicators.
HES	4	4	While no specific mention of the scheduled monument Girvan Mains, Roman camps, linear cropmark and enclosure (SM5596) in the assessment here it is worth noting that the scheduled area extends close to the existing coastline. (Cell 6c61)	Environmental report updated to reflect this comment. Councils to note in future detailed planning.
HES	4	5	It should also be noted that further down the coast the category B listed Memorial Stone at Lendalfoot (LB1059) lies on the coastal side of the A77. (Cell 6c63)	Environmental report updated to reflect this comment. Councils to note in future detailed planning. Note that works are unlikely in this specific area as no assets are at risk.
HES	5	1 - 3	With regard to the area around Lochranza Castle we would welcome early engagement as part of the feasibility study to ensure that the relevant Construction and Environment Management Plan appropriately addressed and mitigates the predicted impacts.	Recommendation noted for future collaborative working with NAC and SAC. These consultations are recommended within the mitigation of the SEA Env Report and the SMP.
SEPA	2	1	It would have been useful if the ER had included a table to	All responses received were acknowledged

			describe how the comments made by the consultation authorities at scoping stage had been taken into account through the SEA.	and logged within Appendix C of Env Report. Where relevant and feasible these comments were incorporated into the development of the SMP and SEA Env Report.
SEPA	2	4	Generally, we consider that relevant environmental issues have been identified in the ER. However, you may wish to make specific reference to the SEPA Indicative Flood Risk Maps with regard to the flood risk context along the shoreline.	Text updated within the environmental baseline to reflect this.
SEPA	2	6	It may have been beneficial if the SEA considered the implications of each policy alternative (i.e. no active intervention, hold the line, advance the line or managed realignment) for each Coastal Sub-Cell Policy Unit. This would have helped to inform the choice of option in each location.	Following an iterative screening and assessment process that included environmental indicators, only technically viable policies were assessed, i.e. only those being considered by the Plan. Policies considered to be inappropriate were not considered further in the Plan process and therefore there would be no need to assess them solely for environmental purposes.
SEPA	2	7	Table 3.4 indicates that the SMP's Action Plan, which sets out the methods by which the policy for each of the Coastal Sub-Cells may be implemented, would be assessed. It is not clear how these proposals have been captured within the assessment.	The Action Plan was the information assessed in the SEA Env Report.
SEPA	2	8	... 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. It may have been beneficial to consider what specific changes or mitigation measures are needed to address the negative environmental impacts or enhance positive environmental impacts predicted for the proposed Coastal Sub-Cell Policy Unit within the assessment.	An iterative screening and assessment process that included environmental indicators took place amongst the working group to establish the proposed policies to be taken forward within the SMP. Any environmental impacts identified within the SEA were then taken into account within the assessment of the options and summarised within Section 5 of the SMP. Further to this where impacts have been anticipated at this strategic level, measures have been proposed to help avoid, reduce or mitigate for negative impacts at the next detailed stage of study.
SEPA	2	9	We also welcome the intended monitoring programme details in Section 8.3 of the ER. It may have been useful to link this with the specific effects identified within the assessment.	Monitoring proposals within Section 8.2 of the environmental report are based on the strategic environmental objectives. Impact specific mitigation could be implemented at the next detailed stage of study / feasibility.

Questionnaire 13	26	Q13	Sewerage problems have not been addressed from raw sewerage pipe outlet at beach.	As the driver of the SMP is the Local Flood Risk Management Plan, the SMP is focused on flood risk and erosion, however not directly addressing water quality issues.
Scottish Water		Q4	I would not consider the conclusions of the environmental assessment take into consideration fully the pressures on the water environment as Scottish Water have not been asked to comment on the impact of continuous and intermittent discharges to the natural environment. Further consultation should be undertaken with Scottish Water and the relevant authorities with regard to environmental impact to fully understand flood risk from sewers and sewerage systems at coastal locations and the impact of discharges on the watercourses. The impact of continuous discharges to the water environment should be considered in the assessment of water quality.	As the driver of the SMP is the Local Flood Risk Management Plan, the SMP is focused on flood risk and erosion, however not directly addressing water quality issues.
SNH	2		The 'hold the line' approach for the whole front of Ayr and Irvine Bay over the next 100 period is ambitious and requires more detailed consideration. In respect of this approach and the linkages with the National Coastal Change Assessment, SNH will take a wide view throughout input into the Scottish Governments Dynamic Coast Project.	Additional text provided in the SMP to further explain the definition of 'hold the line', for example - "Hold the Line" does not mean that measures have to be applied unilaterally along the entire frontage to hold the line, rather that subsequent consenting processes that build on the SMP should not presume against an application for measures to hold the line in this area. Thus in essence "No active intervention" is always an option, whereas the more intrusive policies that provide greater protection to vulnerable assets near the coast are only applicable where such measures are permitted by the SMP policy and are demonstrated to be justified and acceptable in terms of all other applicable criteria.
SNH	2		Policy Unity 6B1.1 Skelmorlie to Largs - The hold the line policy would involve coastal defences being upgraded and extended. The might permanently obscure or damage notified rock outcrops of Largs Coast Section SSSI, much of which directly adjoins the existing defences for the A78 road. Therefore the SEA (p52) should conclude Significant impacts on Biodiversity, rather than 'no significant impacts'. Suitable mitigation for existing defences	In the assessment it was concluded that no encroachment on the SSSI was anticipated and therefore no significant impacts anticipated. Text amended in Environmental Report to reflect this. Agreed that a site specific approach is recommended.

			could involve restricting works to the existing footprint. Mitigation for defence extensions might be to only allow obscuring or damage to parts of the rock sequence that are adequately represented elsewhere in the SSSI. A site specific approach is recommended.	
SNH	2		Policy Unit 6B2.1 Hunterston - As no details of the proposals are given, the land claims and developments of the last 50 years are a dominant control on the tidal flats, the statement 'extending...existing defences... will have minimal impact on the sediment regime' seems unjustified (SMP p81). It is also contradicted by the SEA (p58 Geology Soils Etc.) identifying 'potential impact on the natural processes and...sediment transport within.... Southannan Sands SSSI". New land-claim could indeed convert some notified sandflat to mudflat, and permanently remove some. Therefore, in the SEA (p57), a Significant impact on Biodiversity is more appropriate than the Moderate given, and would be in line with our SMS. The proposed 'detailed process modelling' is not in itself mitigation; to devise on-site mitigation may be very difficult.	SMP and SEA text checked and revised for consistency. Potential impacts biodiversity, flora, fauna and natural heritage amended to significant as recommended.
SNH	2		Policy Unit 6C2.1 Ardrossan to Stevenston. The Hold the Line Policy would involve coastal defences being upgraded and extended, which could permanently obscure or damage rock outcrops within Ardrossan to Saltcoats Coast SSSI. The policy also proposes soft engineering at Stevenston beach, which could mean some outcrops being temporarily obscured e.g. if beach nourishment was chosen. Therefore the SEA finding of 'a lack of any identifiable impact pathways' on this SSSI isn't justified. The SEA (p69-70) gives a Moderate impact on Biodiversity (for SSSIs further south), but Significant seems more appropriate. Suitable mitigation for hard defences could be as set out above for 6b1.1. Mitigation for the soft engineering would be to select methods unlikely to increase sedimentation on rock outcrops.	In the assessment it was concluded that no impacts on the SSSI were anticipated as the area of risk / management is at Stevenston Beach and not near to the SSSI. Text amended in Environmental Report to further reflect this.
SNH	2		Policy unit 6c2.3 Irvine Bay mouth of Garnock estuary to Gales Burn. The medium-term Hold the Line policy here is that 'soft engineering including dune stabilisation.... Will be updated and extended' (SMP p103). The features of Western Gales SSSI are supported by coastal dynamism, including erosion and sand-blow as well as backshore vegetation growth. The proposed measures could semi-permanently disrupt the SSSI functioning if they were	Issues that are being experienced in the areas of the Western Gales SSSI would seem to be from storm events and not long term erosion. The policy looks to maintain the dunes and therefore the habitat for the invertebrate assemblages. The potential for moderate negative impacts and not significant is

			<p>within the SSSI, and could affect it even if they were merely adjacent. Therefore, a significant impact on biodiversity may be more appropriate than the moderate given in the SEA (p69-70). The proposed mitigation 'ensure protection measures do not encroach upon the designated site boundaries' is very welcome, though surely a clearer way to achieve this would be to specify No Active Intervention within the SSSI. It is recommended as further mitigation that even if soft engineering is installed adjacent to the SSSI, it is sensitively designed so that the SSSIs sediment budget and wave regime is not adversely affected.</p>	<p>proposed as the management policy is looking to maintain the system. A policy of no active intervention in the area may still be implemented, however with the assets behind the dune system active management may be required in the future to maintain this dune system in its current form. Additional mitigation text added to the SEA and SMP as recommended.</p>
SNH	3		<p>Policy Unit 6D1 South Ballantrae to Currarie Port - This SSSI needs to be added to the list of SSSIs in SEA at p97-98. Sgavoch SSSI, immediately to the South of Ballantrae Shingle Beach has also been omitted.</p>	<p>Text updated within the SEA to include these SSSIs. No additional impacts are anticipated as there are no active interventions south of the pier at Ballantrae. Any designations (and their conservation criteria) within the vicinity of proposed active management measures will need taken into consideration at the next stage of detailed planning.</p>
Campbell	6		<p>There was no open community involvement in the scoping phase of the SEA in early 2017 at the start of the study. It seems only statutory consultees were involved.</p>	<p>An SEA Scoping Report for the SMP was circulated on the 6th September 2016 to the following statutory consultees:          Scottish Environment Protection Agency          Scottish Natural Heritage          Historic Environment Scotland          The Scoping Report was also made publically available via the North Ayrshire Council and South Ayrshire Council websites.</p>
Campbell	7		<p>The Clachlands Point to Corrygills Site of Special Scientific Interest is likely to be threatened due to the implementation of the No Active Intervention Policy Proposed here. This probably means that an important tourist walking route will go. This may be the correct decision but perhaps Arran should have been more widely consulted since tourism is important and the geology of the island especially so – Arran is starting to look at being a geo-park and that walk is important.</p>	<p>The potential impact on the walking trail at the SSSI is noted for consideration by the Council in any further study or assessment of this area. If the trail is at risk of erosion or flooding it may need amended or re-routed, however this is not one of the key indicators of the SMP. In allowing natural processes to continue there is unlikely to be any impacts on the SSSI itself.</p>

