

Ballater Flood Protection Option 3A Briefing Note

Ballater and Crathie Community Council (BCCC)

prepared by Flooding Issues Group (FIG)

Executive Summary

This briefing note describes the main reasons why BCCC opposes Option 3A and why BCCC has asked our councillors to seek its formal withdrawal. The main reasons are:

A. There is strong Community Opposition to 3A – BCCC has carefully considered extensive community feedback (public and BCCC meetings, BCCC councillors seeking residents' input, Eagle articles and responses, Facebook feedback, Community Action Plan survey feedback etc.) over the last 2 years. BCCC conclude that there is strong community support for some form of flood defences, but the overwhelming majority and all major stakeholders are strongly opposed to 3A mainly because of its impact on Ballater's built environment, amenity and economy.

B. 3A is not economically "viable" – Scottish Government^[3] (SG) recommend full economic social and environmental (ESE) assessment as a key part of option appraisal. However, this has not been done for 3A. With limited time, only project and flood damage costs were included and the negative economic impact of the defences themselves was not considered. Aberdeenshire Council have stated that this will be covered in the next phase. However, BCCC estimate 3A's economic downside as approximately £40m (due to severe impacts on village amenity, caravan park and golf course as detailed in Section 3.2). As 3A is only marginally viable without these economic effects, **it is certainly not economically viable, once they are included.**

C. 3A cannot meet Key Community needs in reasonable time or fully

Timing Certainty: It is over 8 years since Storm Frank devastated Ballater and yet there is still no clear date for a 3A funding decision. More broadly, SG's flooding programme is hugely overspent and the SG has announced this will now be reassessed in a climate change context. Taken with points A & B above it's clear that 3A has no prospect of actually being completed.

Protection from Increased Damage from Higher Frequency Floods: Since 2020, due to river changes, Ballater is exposed to greatly increased damage from higher frequency flood events. There is an urgent need for action to address this. 3A being still active prevents this.

Climate Change (CC) Mitigation: It is predicted that CC will contribute to increased Deeside flooding and drought. Experts consider that a CC Catchment Level mitigation strategy is better than traditional flood protection. The SG considered this in its 2023 flood policy review. A catchment level approach would make large fixed defences like 3A redundant.

It is concluded that **3A cannot meet the needs of the community for effective timely flood defence and climate change mitigation and its continuation would be a waste of public funds.** It should therefore be withdrawn as soon as possible to allow alternative approaches to be fully considered.

1. Overview

1.1 In December 2015, heavy rainfall during Storm Frank caused the River Dee to burst its banks causing flooding to over 300 residential and commercial properties in the Ballater area. The storm caused major damage and had a long term impact on the local economy.

1.2 In response to this Aberdeenshire Council (AbCo) commissioned a detailed flood protection feasibility study^[1] from engineering consultants RPS'. The study objectives were as follows^[1];

The main objectives of the Ballater Flood Protection Study are to develop better understanding of flood risk; assess the extent of the existing flood risk and; develop, appraise and recommend options to manage flood risk. The options may include a range of structural and non-structural options, for example flood protection schemes, natural flood management (NFM), awareness raising and property level protection (PLP).

1.3 In March 2019 RPS' issued a detailed report^[1]. Their key recommendation was to provide a fully engineered fixed flood protection barrier for Ballater to meet a 0.5% Annual Exceedance Probability (AEP) (i.e. to meet a flood event that would be expected to be exceeded only once on average every 200 yrs). This standard of protection (SoP) did not take account of climate change (although it was proposed that foundations be dimensioned to allow for future enhancement). The design did however include a 0.6m (freeboard) height margin of safety. Overall, the design flood condition adopted was slightly greater than that experienced during the Storm Frank flood.

1.4 Various flood protection options were first screened and then subject to cost benefit evaluation as a result of which 'Option 3A' was selected. 'Option 3A' is summarised in slides 14, 15, 26 and 27 of RPS's presentation^[2]. It consists of; 3km of direct defences, 5 properties relocated, property level protection in flood cells 3&4 (i.e. River Gairn & Upper Dee) and a program of improved resilience. The proposed direct defences are topped by glass walls over 0.8kms and their height varies between 1 and 3.8m above ground level.

1.5 Option 3A was assigned a cost estimate of £37m and was support by the Mar Area committee following a brief public consultation process. It was then submitted to SG by AbCo for consideration in round 2 of SG's flood protection budget allocation. A funding decision on this proposal was originally expected in 2021.

1.6 In the meantime Ballater and Crathie Community Council (BCCC) established the Flooding Issues Group (FIG) as a sub-committee tasked with assisting the BCCC at its request and under its direction to;

- A. *Proactively identify and assess issues regarding flooding of the local community*
- B. *Assist BCCC in obtaining the broadest possible consensus in the local community as to the level of protection from flooding that is realistic obtainable and desirable.*
- C. *Take into account views expressed by the public and any other relevant evidence, it should co-ordinate and communicate such actions as it considers to be suitable and supported by the local community and convey its finding and conclusions to the relevant authority for consideration.*

D. Promote the well being and safety of the community resident within the community council area.

1.6 At the time of submission of the 3A proposal to SG, BCCC gave their conditional support to the proposal on the basis that major concerns expressed by the Ballater Community could be accommodated during detailed engineering. However, since then it has been confirmed that material changes to the design (i.e. to the route, nature and elevation of the defences) will not be possible. Owing to this and several other major issues BCCC's current position is to oppose 3A **and request that it is formally withdrawn**. This briefing note describes some of the detailed factors behind BCCC's change of position.

1.7 The main issues that BCCC have taken into account can be summarised as;

A - Community Opposition – AbCo, BCCC and FIG have engaged in a large number of different feedback processes details of which are given in the following section 2. Having carefully considered the feedback, FIG conclude that the overwhelming majority of the community and all major stakeholders are strongly opposed to 3A.

B – Lack of Sustainability – (Economic and Other Impacts) - SG Guidance to SEPA on flood option appraisal^[3] states;

*“A sustainable solution will take **full account of economic, social and environmental impacts**, and protect and enhance our natural and built environment for ourselves and for future generations.”*

The option selection process for 3A **did not include a full economic, social & environmental (ESE) impact assessment**. AbCo have stated that this would take place in the next phase, however, as the fixed defence for 3A passes through the Caravan Park and the Golf Course it is clear that the economic impact would be significant even before the height and nature of defences closer to the village are considered. FIG's preliminary 'middle' estimate suggests an economic downside for 3A of approximately £40m. FIG therefore conclude that even before social and environmental considerations are taken into account, Option 3A proposal is **not an economically 'sustainable solution'**^[3].

C – Failure to Serve the Needs of the Community

In December 2023 it will be 8 years since the Storm Frank flood event devastated Ballater yet there is currently no clear date when any decision on the funding proposal for 3A will be taken by the SG. Even if 3A it is selected for funding there will then be a requirement for detailed engineering, consents and possible legal challenges before tendering, letting contracts and eventually construction. Given the strong opposition of the community and the severe pressure on govt funding for flood defence, it is highly unlikely that the project could be completed in the next 10 years, (even if it is completed at all). This process completion risk is before any of the engineering and related construction risks are considered. In the meantime

the condition of the riverbank near the village is deteriorating and the community is exposed to significantly increased flood risk. **3A cannot therefore meet the needs of the community for effective timely flood defence and mitigation** and should therefore be withdrawn to allow alternative approaches to be considered.

1.8 Further details of each of the above issues are given in the following sections.

2. Community Feedback – Consultation Processes etc

2.1 Consultation Processes

2.1.1 The following consultation processes, meetings, communication channels etc have been taken into consideration by FIG;

Throughout 2020 and 2021, FIG engaged directly with every member of the community and relevant organisation, willing to talk.

A public meeting on 7th April 2022 was arranged by BCCC to review the process for Option 3A should funding from SG be forthcoming. The meeting was attended by around 100 Ballater residents and by an AbCo Principal Engineer, a CNPA director, Local Councillors & chaired by the MSP; SEPA were unable to attend, but sent a statement. Those residents who attended expressed disappointment regarding the previous engagement around Option 3A and remained unconvinced that their concerns around the proposals would be factored into the finalised designs. FIG subsequently met and discussed with senior management at AbCo the views of the community expressed at the public meeting. Those officers stated that they intended to do further work to develop a more robust understanding of the views of the community on Option 3A as a matter of urgency, including direct engagement with impacted stakeholders, including the Golf Club and the Caravan Park, to understand what might be possible to mitigate the negative impacts. No such engagement from AbCo has occurred.

FIG produced a new draft workstream document, including a new position on Option 3A, in November 2022. BCCC had until then supported Option 3A subject to legitimate concerns being addressed. It was publicly announced that BCCC needed to decide whether to oppose Option 3A and that BCCC would vote on this issue at its meeting on 9th January 2023 and whether it supported this proposed change of position. All BCCC councillors canvassed local views as fully as possible. There was no opposition to this change of position which was decided at BCCC unanimously on 9th January 2023.

This decision was again endorsed at a subsequent public meeting on 16th November 2023.

2.2 Community Feedback

2.2.1 Many views have been expressed and suggestions made via the various methods of feedback listed above. The common themes can be summarised as follows;

- The overwhelming majority of the community and all major stakeholders are strongly opposed to Option 3A principally because of its massive impact on the village economy, built environment and amenity.
- The community do however support the provision of flood defence and mitigation that can be delivered on a timely basis and in a manner that would actually provide other additional benefits to the community (i.e. as recommended by SG Guidelines^[3]).
- Many members of the community are disappointed by the general lack of progress in flood defence for Ballater and the lack of in depth meaningful consultation prior to the submission of 3A to the SG.

2.2.2 Concerning the consultation process, SG Guidelines on options Appraisal ^[4] recommends the following;

- **All objectives** should be established in dialogue with partners and stakeholders
- Consider actions that could be delivered by the **full range** of stakeholder organisations.
- Actions may be added to or refined by the Local Flood Risk Management Partnerships, the Local Advisory Groups or through engagement with **all stakeholders**.
- Opportunities should be sought throughout the appraisal process to **prevent adverse impacts and to deliver wider benefits**. **Early engagement** with stakeholders is recommended.

2.2.3 Further guidance on consultation is given in SG Guidance on “Delivering Sustainable Flood Risk Management”^[5]. Whilst it is acknowledged the original RPS feasibility study was completed under very great time pressure to meet a funding submission deadline, it is clear that the consultation process prior to the submission of 3A did not;

- Include all relevant stakeholders especially golf club etc. from the outset.
- Include consultation on all study objectives, target SoP etc
- Include evaluation of all adverse ESE impacts
- Provide community feedback early enough to affect the process
- Result in sufficient information transfer to the local community in good time prior to key decisions on submission for funding

2.2.4 Going forward it is suggested that effective comprehensive community consultation should take place **before** any further steps are taken e.g. prior to any revision to objectives, target SoP and strategic approach that might be necessary in the next phase.

3. Sustainability – Economic and Other Impacts

3.1 Appraisal Methodology

3.1.1 Appraisal methodology and option selection is dealt with in Section 4 of RPS's main feasibility report^[1] and the conclusions have been summarised in slides 29 and 30 of the stakeholder presentation^[2]. These sections drive the key output of the study in terms of recommendations to be considered for funding.

3.1.2 The SG gives the following Guidance to SEPA on flood appraisal^[3] which states;

1.2. Aim of options appraisal

1.2.1. The aim of appraisal is to identify and assess options that achieve flood risk management objectives whilst delivering other economic, social and environmental benefits.

1.2.2. Sustainable solutions:

*A sustainable solution will take **full account of economic, social and environmental impacts**, and protect and enhance our natural and built environment for ourselves and for future generations.*

3.1.3 The methodology used in the RPS study^[1] is based on a comparison between the capital 'costs' of alternative (pre-screened options) versus 'benefits' that have been calculated as the cost of the damage to properties and utilities that will be avoided by the scheme. The main basis for the appraisal is therefore a consideration of capital cost of protection vs potential flood asset damage cost and flood protection options are ranked on the basis of that ratio.

3.1.4 AbCo and RPS have been clear that the **full** economic, social and amenity (ESE) impacts of options were **specifically excluded** from the selection process for 3A and that AbCo anticipate that this work would be completed in the next phase. In other words full ESE impacts are to be part of later option appraisal, but were not part of option selection. The potential that this approach creates for the initial selection of solutions that are not actually economically viable is self evident and in FIG's view that is what has occurred here.

3.2 Preliminary Economic Assessment

3.2.1 FIG have performed an assessment of the economic impact of 3A post implementation. The Ballater Caravan Park and Golf Course are two of the most important amenities in Ballater in terms of tourism and associated local jobs. In preparing our economic assessment we have considered the following key impacts:

1. Loss of revenue to the Ballater Caravan Park;
2. Loss of revenue to the Ballater Golf Course;
3. Direct and indirect impact on points 1 & 2 on tourism and local jobs.

Our economic assessment has assumed a low and high financial impact and is backed up by tourism statistics published by CNPA, number of local businesses in Ballater impacted directly and /or indirectly by 3A and a financial report published by Aberdeenshire Council showing the number of local jobs employed directly / indirectly by the Ballater Caravan Park. This data is in public domain.

3.2.2 The results of the assessment can be summarised as follows;

ECONOMIC IMPACT OF 3A POST IMPLEMENTATION

Overall Assumptions

Estimates below are shown per annum and in present £m value

Approx 200 local businesses in Ballater

Tourism statistics shown below as published by CNPA

Impact on local jobs backed up by a financial report published by Aberdeenshire Council

Net Present Value (NPV) calculated using a discount factor of 10%

<u>Areas impacted</u>	<u>Assumptions</u>	<u>Direct</u>	<u>Indirect</u>	<u>Economic Impact £m's</u>	
				<u>Low</u>	<u>High</u>
Caravan Park	A wall through the Caravan Park would completely change the outlook over the hills / countryside and experience for visitors. We have assumed the Caravan Park would cease (High) & have a reduction of 25% (Low) due to less space/ amenity.	x		0.2	0.4
Golf Club	Golf course would be reduced to 9 holes with significantly fewer members / visitors. Every year the Golf Club hosts on average 4000-5000 visitors. We have assumed the Golf Club would cease (High) & be a 9 hole course with an added value reduction of 50% (Low) due to less visitors/ lower fees amenity.	x		0.4	0.5
Local jobs	Knock on effect of Caravan Park and Golf Club. Assumed a loss of 60-120 local jobs		x	2.3	4.5
Tourism / Local Busine	20-30% drop in visitor numbers to Ballater. 1.9m visitors to Cairngorms per annum. 18000 people live in the Cairngorms 1600 in Ballater. Pro-rata 170,000 visitors to Ballater.		x	Included in employment impact	Included in employment impact
Total impact per annum				2.9	5.4
NPV		10%		£ 29m	£ 54m

3.2.3 As can be seen the middle assessment suggests the net present value (NPV) of the economic impact of 3A on the village of Ballater approximately £40m i.e. of the same order of magnitude of both the cost of construction and the cost of the damage to the village that it is proposed to prevent. It is therefore clear that 3A is not economically viable and cannot provide the taxpayer with value for money.

3.3 Amenity, Built Environment and 'Other Benefits'.

3.3.1 FIG are not in position to perform a full ESE assessment however RPS's feasibility study^[1] provides some insights on how the amenity of 3A has been considered during option selection. The report^[1] accepts the principle that hard flood defences at Ballater could affect the village to such an extent as to be impractical. Page 19 Section 3.1 of the main study report^[1] tells us;

"Initially, a standard of protection of 0.5%+CC AEP was considered however, it was determined that developing this option would not be acceptable as Direct Defences would be required and that the maximum height of these defences would be in excess of 4 metres."

3.3.2 In other words defences to meet the standard of 200 yr return plus 20% (climate change allowance would "not be acceptable" because the height of them would be too great. The report^[1] does not tell us exactly how this has been 'determined' but we know that the authors derived a threshold acceptable height of defences on the basis of impact on **visual** amenity (see 3.15 below).

3.3.3 The report^[1] introduces the concept of amenity as follows in Section 2.5.3 page 18 under the heading of 'General Objectives'- (of the Study). The 5th of 5 objectives is to;

- Identify a flood mitigation option which will retain **some** of the **amenity value** of Ballater.

3.3.4 'Amenity' is defined as follows by theplanningportal.co.uk;

*"**Amenity.** A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity".*

3.3.5 "Amenity Value" therefore, is a relatively narrow concept applied in planning when considering applications that might affect open spaces, tree preservation and general town lay out. However for this report^[1] the concept has been narrowed further by considering **only** the **visual** impact related to the height of the flood defences near the town.

3.3.6 One of the key foundations of the Ballater village economy is tourism so the 'amenity' of the village will have a direct impact on the economy, employment etc. They also directly affect two major economic engines of the village i.e. the caravan site and the Golf Club. From this several questions arise;

- Is it tenable to seek to retain only '**some**' of the amenity value of the village as implied in the general study objective (section 2.7 above)?
- Is the narrow concept of **visual** 'amenity' adequate to properly assess the suitability of the various proposals given the significant impact of the defences themselves on the villages' economic and social life?

- Is it tenable that this key aspect of the economic life of the village should be evaluated by means of a limited qualitative assessment as opposed to a detailed quantitative assessment?
- Does the methodology therefore comply with SG Guidance to SEPA on flood appraisal^[3]?

3.3.7 Looking further how (visual) amenity has actually been applied in report^[1] there is also some apparent confusion of objectives. Section 3.3.5.2 states that;

“An iterative process was carried out to find an optimal direct defence solution for Ballater Town which would provide a high standard of protection and **also maintain good amenity value in the town**”.

3.3.8 Targeting a ‘good amenity value’ seems better than the retention of ‘some’ amenity value referenced in Section 2.7 above. However Section 3.3.5.2 of report^[1] goes on to state that;

“.....a maximum acceptable height of direct defences considered was 2.5m, however the maximum standard of protection that traditional direct defences of this height would provide is a 2% AEP event which is not considered an acceptable level of protection as it would not protect against a flood event equivalent to Storm Frank in magnitude. Therefore the 0.5% AEP and 1% AEP events were investigated. As the maximum required defence heights for these events are 3.7m and 3.1m respectively other solutions were sought to either reduce the maximum height required or to help maintain **some** amenity value.”

3.3.9 This paragraph of the report^[1] gives the strong impression that ‘good’ amenity value retention was the **originally** desired objective but that for effective direct defences to protect against a Storm Frank flood event ‘**some**’ amenity value retention was all that could be achieved.

3.3.10 The same paragraph also states that a “maximum acceptable height of direct defences (considered) was 2.5m” and we can assume that this conclusion concerning maximum acceptable height was a key driver in the rejection of the 200yr + 20% fixed defence solution that lead to heights in excess of 4 metres (see section 2.6 above). However, from the report^[1] (see section 3.3.5.2) we know that the limiting height of 2.5 m was derived **solely** based on the **cost** of glass walls and automatic self closing barriers;

“a threshold defence height was initially set at 1.8m (meaning where defences would need to exceed 1.8m in height they would be replaced with either SCFBs or Glass Walls). However, at this threshold more than 1.5km of defences needed to be replaced and costing of this option indicated an estimated whole life cost of approximately £70million and so this threshold was considered economically unviable. As such the threshold for SCFBs/Glass Walls was reviewed and set at 2.5m”.

3.3.11 An initial height of 1.8m is consistent with the ability of a proportion of the population (i.e. those 6ft tall or more) to see over a fixed barrier when standing up and that is probably why it has been selected. However, the above paragraph suggests that the adopted limit of 2.5m was not a **maximum acceptable** height to maintain good visual ‘amenity’ but is actually the **minimum** height at which the authors of the report conclude that ‘**some**’ form of (visual) amenity protection (namely glass walls) can be provided without too

great a **cost escalation**. The acceptance criteria has therefore been modified by the result and conclusions derived do not meet originally stated objectives. Unfortunately, this has not been clearly highlighted in the report and can only be understood by careful reading of relevant paragraphs.

3.4 Involvement of Amenity in Option Selection.

3.4.1 Turning to the evaluation section of the report^[1] (Section 4) and in particular the summary evaluation Table 4.1 which lists the objective to ‘**retain** amenity value of Ballater’. In the evaluation columns all those options that have some element of glass walls and or self elevating barriers are identified as complying with this objective, irrespective of the degree to which they actually achieve it. Hence this not a process of differentiation but an acceptance of all proposals that include ‘some’ degree of visual amenity retention no matter how small.

3.4.2 In Section 3.5 of the report^[1] which describes the Short listed options it is made clear that the amenity that is being considered is ‘visual’ and that the option that is finally recommended (i.e. option 3.5) retains only ‘**some**’ of the (visual) amenity value of Ballater because a 500m section of 1.5m glass wall has been introduced. In summing up Section 5 of the report^[1] states the following about the preferred option 3A;

“Option 3A is the recommended preferred option as it protects properties in Ballater to a 0.5% AEP SoP and delivers other **benefits** other than reduced flood risk to receptors **such as retained amenity value.** “

3.4.3 One can understand why the authors differentiated between options on the basis of visual amenity, but it seems odd to highlight a limited retained (visual) amenity value as a “benefit”. This implies that the inhabitants stand to gain something additional from the option whereas in reality they are just losing slightly less visual amenity than that associated with some of the other options all of which would have a major negative impact.

3.4.4 These are surely not the ‘other benefits’ referred to in the Scot Govt Guidance^[3] which actually refers to things like reclaimed land, added recreational amenity, improved landscaping and so on – in other words actual improvements from the base case without the flood protection measures.

3.4.5 The study authors (RPS) acknowledge some negative impact of fixed defences when adverse impacts are discussed in Section 4.3 and they state that;

“The options may have an adverse impact to the Way of Life by creating a barrier between the river and the town, although this has been reduced in Options 2, 2A, 3 and 3A through implementation of either SCFBs or glass walls. Options 1, 1A, 3 and 3A have a maximum permanent defence height of 3.6m **which may be considered socially unacceptable**”

3.4.6 However, whilst RPS acknowledge that the recommended scheme (3A) ‘may not be socially unacceptable’ due to its impact on visual amenity, neither this potential nor the broader economic impact of the proposed defences on the village the caravan park and the golf course are actually mentioned in the option evaluation tables. This is perhaps because all the selected options have similar

negative impacts. Nevertheless this seems at odds with the SG Guidance^[3] on the issue which states;

“In specific cases, a caravan park may provide important support to another feature (such as tourism) or the revenue of another operation (such as an associated harbour). Moving the caravan park may not be possible within the local area and may therefore have significant impact on the sustainability of other values in the area. It is important that the overall interaction of features are identified and recorded. Information of this type may be particularly significant in drawing comparison between options.” - * e.g. a golf course.*

3.5 In summary from this Section (3) it is therefore concluded that;

- A detailed and very professional study^[1] was completed which enhanced the understanding of the flood risk at Ballater and the relative technical performance of various options for large fixed defences.
- However, the chosen evaluation methodology does not adequately address the negative impact of the proposed flood defence options on the economic and social life of the village.
- The only area where this has been considered is in connection with the visual amenity of the various flood defence options and even here the approach is extremely limited and does not meaningfully evaluate the considerable negative impact of the proposals.
- FIG’s preliminary assessment of the economic impact of 3A on the village leads to the clear conclusion that it would not be economically sustainable and RPS’ report shows that the impact of 3A on the village’ visual amenity, built environment etc would also be extremely significant.
- Finally it should be noted that as many key elements of the selected Option 3A do not meet the originally stated objectives of the feasibility study and **the process of option selection does not meet relevant Scottish Government Guidelines** the proposals are vulnerable to legal challenge.

4. Serving the Needs of The Community

4.1 Application for Scottish Government Funding

4.1.1 The selection process that led to the adoption of 3A was completed on the publication of RPS’ feasibility report in March 2019. There was then a brief period of public consultation including a public meeting in Ballater in September 2019. The 3A proposal was approved by the Marr Area Committee of Aberdeenshire council on 5 November 2019 and subsequently by the Infrastructure Services Committee and then submitted to SG by AbCo for consideration in round 2 of SG flood protection budget allocation.

4.1.2 A funding decision on this proposal was originally expected in 2021 but the decision has now been further delayed and there is currently no indication when it will finally be taken.

4.2 Process following Budgetary Approval

4.2.1 Assuming a decision is finally taken by the SG on funding for 3A a great deal of work will be required before construction could be completed (i.e. detailed engineering, planning consents, tendering, contracting and finally construction). With a 'fair wind' this is likely to take at least 7 years, however if there is significant opposition legal challenges, funding issues etc the schedule could easily increase to 10 or 15 years.

4.3 Financial Background

4.3.1 The budget for 28 'vital' flood protection schemes approved by the SG in round 1 is now expected to cost nearly 1 billion pounds (i.e three times the estimates made in 2016. In the meantime it has been reported that SG faces a £1bn shortfall for day-to-day spending next year, according to its finance watchdog.

4.3.2 The Scottish Fiscal Commission said the gap between income and spending plans could rise to £1.9bn in four years. That would equate to 4% of the resource budget when the SG is required to balance spending with income. Finance Secretary Shona Robison said the outlook was extremely challenging. Plans for capital spending are now seen as "unsustainable" and are to go through a more radical "reset". The capital budget is expected to fall by 14% in real terms within the next four years, leaving a gap between available funds and investment plans of £900m by 2025.

4.3.3 As has previously been observed the 3A proposal is not financially viable when its economic impacts are fully evaluated and is strongly opposed by the majority of the community and all major stakeholders. It should therefore be clear that the chances of the 3A proposal receiving funding and then actually being completed are negligible.

4.4 Current Erosion of River Bank

4.4.1 In the meantime, the village and its inhabitants are exposed to the continuing risk of flooding due to high frequency events i.e. every year or every second year. Since 2020, due to river changes, this risk has greatly increased. There is an urgent need for action to address this. 3A being still active prevents this.

4.5 Climate Change Mitigation

4.5.1 It is predicted that CC will contribute to increased Deeside flooding and drought. Experts consider that a CC Catchment Level mitigation strategy is better than traditional flood protection. The SG considered this in its 2023 flood policy review. A catchment level approach would make large fixed defences like 3A redundant.

4.6 In Summary

In summary it is concluded that **3A cannot meet the needs of the community for effective timely flood defence and climate change mitigation and its continuation would be a waste of public funds.** It should therefore be withdrawn as soon as possible to allow alternative approaches to be fully considered.

References

- [1] Ballater Flood Protection Study - Feasibility Report - IBE1 8_March2019_D03
- [2] Ballater Flood Protection Community Engagement Questionnaire issued by Aberdeenshire Council
- [3] Options appraisal for flood risk management: Guidance to support SEPA and the responsible authorities - First Edition May 2016 – Scottish Government.
- [4] Ballater Flood Protection Study - Hydraulic Analysis Chapter - IBE1358_BallaterFPS_Rp02_F01
- [5] Delivering Sustainable Flood Risk Management - Second Edition February 2019 - Scottish Government.