

## SSSIs and Moray Coast Storm Outfalls

Document no: *[Document number]*

Revision: *[Revision/Version]*

Catchment Moray Limited

*[Client reference]*

Wetways Tayside PFI (Moray Coast Wastewater Project)

30 April 2025



## SSSIs and Moray Coast Storm Outfalls

**Client name:** Catchment Moray Limited  
**Project name:** Wetways Tayside PFI (Moray Coast Wastewater Project)  
**Client reference:** [Client reference] **Project no:** 204607CH  
**Document no:** [Document number] **Project manager:** [Project manager]  
**Revision:** [Revision/Version] **Prepared by:** John Fowbert  
**Date:** 30 April 2025 **File name:** SSSIs and Moray Coast Storm Outfalls\_V2\_New template  
**Document status:** [Document suitability – Delete row if not applicable]

## Document history and status

Revision	Date	Description	Author	Checked	Reviewed	Approved
0	29/04/25	First Draft	JAF	-	GH	-
1	30/04/25	Final version	JAF	EW	GH	GH

## Distribution of copies

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## 1. Introduction

This document has been produced as an addendum to the Marine Licence Application for works to storm outfalls associated with the Moray Coast Wastewater Project ('the Project') and concerns Special Sites of Scientific Interest (SSSIs).

This document confirms the SSSIs potentially affected, identifies those outfalls which may affect them and discusses how any potential impacts will be avoided or mitigated. All SSSI information is taken from the NatureScot SiteLink website<sup>1</sup> and is accurate as at April 2025.

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<sup>1</sup> <https://sitelink.nature.scot/home>

## 2. SSSIs Potentially Affected by the Project

A review of all 20 wastewater outfalls comprising the Moray Coast Wastewater Project confirmed that three SSSIs intersected with ten outfalls (as stated in Table 1 below). One outfall and/or its pipeline fall within the Cullen to Stake Ness Coast SSSI, two within the Masonshaugh SSSI and seven within the Whitehills to Melrose Coast SSSI. All of the SSSIs are designated for their geological features but Cullen to Stake Ness Coast SSSI is also designated for its biological features.

**Table 1: Intersection of outfalls with SSSIs**

SSSI	Outfall Location	Type of Intersection
Cullen to Stake Ness Coast	Cullen	Pipeline and outfall point within the SSSI
Masonshaugh	Burghead	Pipeline routed through the SSSI
	Cummingston	Pipeline routed through the SSSI
Whitehills to Melrose Coast	Bankhead	Pipeline routed through the SSSI
	Craigfauld	Pipeline and outfall point within the SSSI
	Inverboyndie	Pipeline routed through the SSSI
	Scotstown	Pipeline and outfall point within the SSSI
	Union Road	Pipeline and outfall point within the SSSI
	Whitehills	Pipeline and outfall point within the SSSI
	Whitehills Harbour	Pipeline and outfall point within the SSSI

### Cullen to Stake Ness Coast SSSI (NatureScot Site Code 480)

Cullen to Stake Ness Coast SSSI occupies an intricate coastline nearly 20km long. The bulk of the site comprises a low, narrow coastal platform with extensive rocky shores, sand and shingle bays, and a low vegetated raised beach. This is backed by a vegetated raised cliff-line, which includes cliff-top heath at two main locations. The site has both biological and geological interests – six in total. These comprise:

#### Geological Features

- Dalradian
- Quaternary of Scotland

#### Biological Features

- Lowland dry heath
- Saltmarsh
- Shingle
- Springs (including flushes)

The site is an important part of a longer coastal section (Cullen to Troup Head) that provides the longest continuous section across the strike of the Dalradian succession in Scotland. The Boyne Limestone Quarry,

located 2km to the east of Portsoy, is also important geologically for exposures of Quaternary sediments that demonstrate the glacial stratigraphy of the southern coast of the Moray Firth. The key exposures for this interest currently lie outwith the site.

The site also has a wide range of coastal habitats. They include vegetated shingle beaches, calcareous sand dunes, complex areas of fresh, salt and brackish marshes and a distinctive area of heath at Redhythe Point. These habitats support rare flora and fauna.

### **Masonshaugh SSSI (NatureScot Site Code 1132)**

Masonshaugh SSSI stretches east from Burghead for approximately 2.6km to Cummington. The site contains some of the earliest rocks of the sequence known as the Hopeman Sandstone Formation and the Burghead Sandstone Formation. The former essentially consists of consolidated wind-blown sand-dunes and the latter are mainly water-deposited sands and gravels. The site has two features, comprising:

#### Geological Features

- Permian-Triassic Reptilia
- Permian Triassic (red beds)

### **Whitehills to Melrose Coast SSSI (NatureScot Site Code 1631)**

Whitehills to Melrose Coast SSSI is located on the north Aberdeenshire coast, either side of Banff and Macduff, and is an important part of a longer coastal section (Cullen to Troup Head) that provides the longest continuous section across the strike of the Dalradian succession in Scotland. The SSSI has one feature:

#### Geological Features

- Dalradian

The rocks are well-exposed throughout the site, although the full extent of the exposure is only seen at low tide. However, there are some possible threats associated with the fact that the site lies so close to towns, including that resulting from sewage outfall pipes. NatureScot states that "*Generally, works within the site boundary which do not have a major effect on rock exposures will be considered compatible with the special interest.*"

### 3. The Proposed Works and Potential Impacts

#### The Proposed Works

The Project comprises concrete repair work to existing sea outfalls at 20 locations on the Moray coast. This will include cutting back areas of damaged or eroded concrete, repairs to pipework, installation of resin anchors, shuttering and pouring concrete and installing rip rap/rock armour.

The works will not alter the assets as designed and will not affect access to the shore.

The working area at each of the 20 outfall locations is restricted to the immediate area surrounding the pipe and to allow enough room for plant and construction workers to safely access and complete repairs and maintenance on the pipes. There will be no requirement for the sea to be excluded with all works taking place to coincide with low tides. The works will address damage caused by erosion and undercutting of the outfall pipes and associated concrete coverings. A 20-tonne excavator and a 7-tonne tracked dumper will be required in some areas to complete the localised works.

Works are likely to be short in nature lasting from one day to three weeks, with repeat visits as and when remedial works are required throughout the duration of the five-year licence. Works will not be seasonally restricted and will take place throughout the year when tides and weather allow. There will be no change in discharge frequency or quantity as a result of these maintenance works.

#### Potential Impacts

Potential impacts from the maintenance works comprise the loss and/or degradation of geological and biological features during the works themselves. This potentially might include during access ramp installation to gain access to the shore which is one of the tasks listed in Appendix D (method statement) of the marine licence application.

#### Biological Features of the SSSIs

One outfall (Cullen) was identified with the Cullen to Stake Ness Coast SSSI, with the pipeline and outfall point both within the designated area. The outfall location is adjacent to the harbour and community of Cullen, specifically a compacted car parking area and recycling centre, with sections of sloping masonry and shingle/cobble at the seaward side. None of the habitat types for which the site is designated (lowland dry heath, saltmarsh, vegetated shingle and springs

#### Geological Features of the SSSIs

Some of the geological features have the potential to be present at all nine identified outfall locations. As indicated above these features could be impacted during construction especially as a result of ramp construction. It should be noted, however, that not all outfall locations would require a ramp. Furthermore, the following approach will be taken where ramps are necessary.

- Ramps will be installed over sea defences (sea walls or rock armour) rather than natural rock formations.
- Where possible the existing rock armour would be infilled with local beach stones or additional material would be brought in. The rock armour would be further protected using plywood sheets or matting.
- The contractor will be expected to keep vehicle movements on the shore to the minimum and keep the machinery size to the maximum required to complete the job. Where possible vehicle will be fitted with rubber tracks.
- No excavations will be required in the rock formations as the repairs are being carried out on existing concrete structures.

- Care will be taken if machinery is moving in close proximity to any rock formations.
- If machinery is required to traverse any rock formations additional ground protection in the form of plywood sheet or matting, for example, will be used.
- Contractors will be required to take photographs of the site and access points before commencing any work and will return the site to the 'as found' condition before de-mobilization.

Finally, if during the works the condition of any outfall is such that works within rock formation areas are required to take place, consultation will be undertaken with NatureScot to define specific mitigation measures.

Undertaking the works as indicated above and with the requirement that should site conditions change, further consultation with NatureScot will be carried out, there will be no impact on any of the geological features of any of the three SSSIs.

## 4. Summary

Ten of the 20 stormwater outfall locations are associated with three SSSIs. These SSSIs are designated for geological features and, in the case of Cullen to Stake Ness Coast SSSI, also for biological features. One outfall (Cullen) is associated with the Cullen to Stake Ness Coast SSSI and none of the habitat types for which the site is designated are present at the outfall location. There are therefore no conceivable impacts on these features.

The geological features of all three SSSIs are potentially at risk from the repair works to the outfalls themselves, but mainly from the temporary construction of access ramps. However, the approach taken indicates that ramps and the works will avoid the rock formations and therefore no impacts to these features are predicted. Should site circumstances change contractors will be required to engage with NatureScot to ensure that the rock formation features are not damaged.