

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 May 2018 10:03  
**To:** [REDACTED]  
**Subject:** FW: Gairloch  
**Attachments:** Gairloch overview - Mar 2018.docx

-----Original Message-----

**From:** [REDACTED]  
**Sent:** 06 March 2018 13:52  
**To:** [REDACTED]  
**Subject:** RE: Gairloch

[REDACTED]

Attached is an up-to-date briefing on Gairloch including our plans and way of thinking. Have a read and give me a bell on [REDACTED] when suits.

-----Original Message-----

**From:** [REDACTED]  
**Sent:** 06 March 2018 11:48  
**To:** [REDACTED]  
**Subject:** RE: Gairloch

[REDACTED]

Gathering urgency on Gairloch we really need some input during today happy to discuss.

Cheers [REDACTED]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** 01 March 2018 15:39  
**To:** [REDACTED]  
**Subject:** Re: Gairloch

[REDACTED]

Yes we've put some firepower into getting it moving quicker. A sense of urgency has been instilled.

[REDACTED]

Sent from my iPhone

> On 1 Mar 2018, at 14:13, "[REDACTED]" wrote:

>  
> [REDACTED]  
>

> Fair enough lets get in touch when the letter comes in and get a suitable response agreed. In the meantime I guess you will attempt to clarify the renewables approach and timetable as far as you can?

> [REDACTED]  
>

> -----Original Message-----

> From: [REDACTED]  
> Sent: 01 March 2018 10:01  
> To: [REDACTED]  
> Subject: Gairloch

>  
> [REDACTED]  
>

> You may have seen from press cuttings that [REDACTED] is intending to write to the Cabinet Secretary re Gairloch WWTW. I'm sure you're aware of the background.

> It's very unfortunate that internal delays have created a gap which has given rise to further community concerns, media and political interest. However the plan, which was communicated to the community, to install some form of renewable generation at the site to offset the carbon and financial costs of year-round running is still the plan.

> I can't tell you whether that will be wind or solar and what vehicle will deliver it, these are the internal debates that have unfortunately taken too long, but a renewables solution is still our agreed way forward.

> Hope that is of some help, if you need any more let me know.

> Regards

> [REDACTED]

> Sent from my iPhone

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> Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

> Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

> \*\*\*\*\*

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# Gairloch Waste Water Treatment Works: briefing on proposed way forward

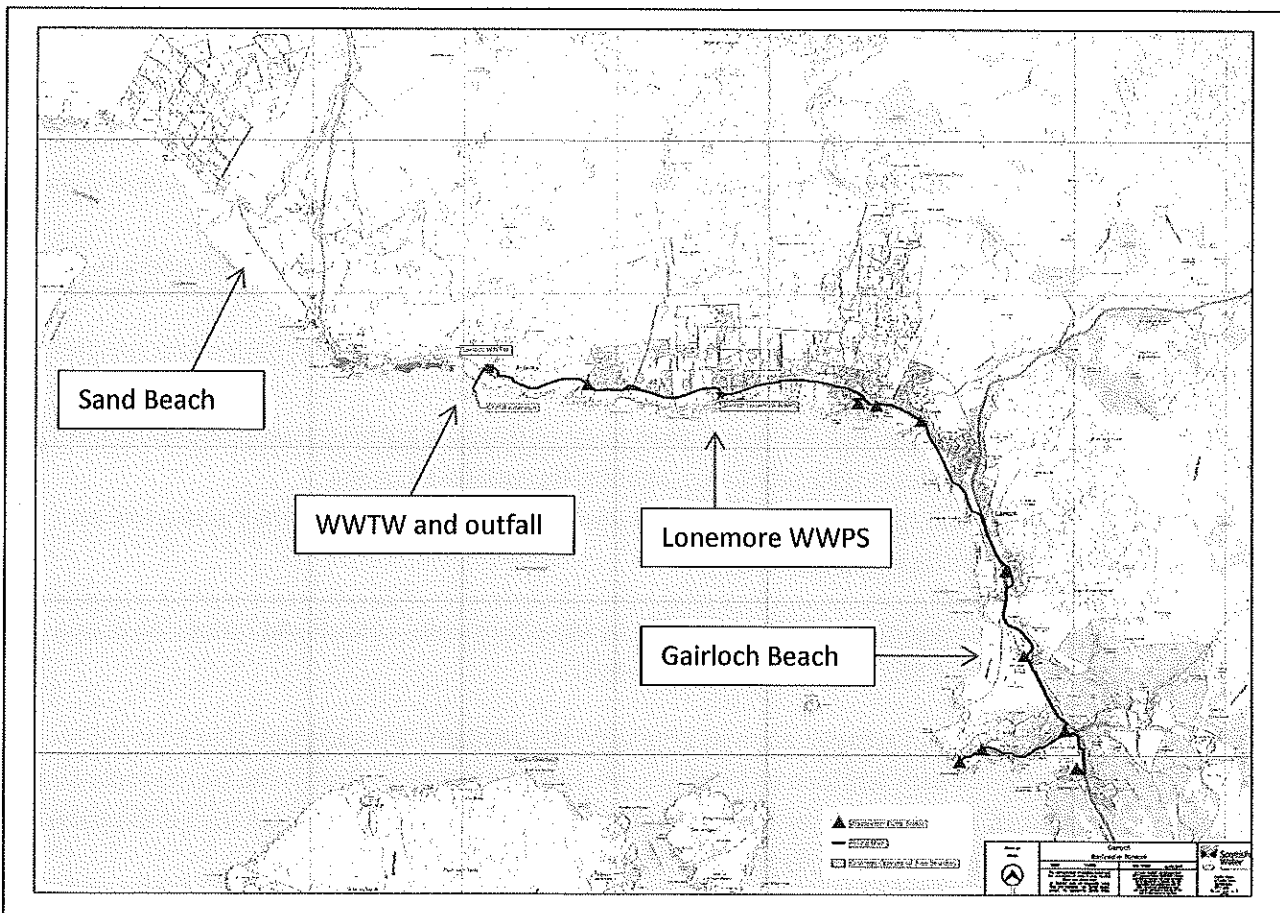
## Background

Since 2015, Scottish Water has been engaging with the local community about investment plans for the Waste Water Treatment Works in Gairloch, Wester Ross, which serves a population of around 1,000 customers.

The existing WWTW is a membrane bioreactor plant which was installed in 2002. The community's perception, informed by information provided at the time of its construction, is that the plant provides a high standard of sewage treatment.

The technology involved has not performed well in operation and Scottish Water has obtained agreement to reduce the flows that it is required by licence to process. Even with significantly reduced licence requirements, the membrane plant is energy and labour intensive to operate. During heavy rainfall, it has been unable to process the required flows, resulting in untreated sewage spilling at Lonemore.

Scottish Water originally proposed to replace the membrane bioreactor plant with 3 septic tanks on its existing site and, following independent review, included a 25 metre extension to the existing outfall pipe.



## Community response to original Scottish Water proposals

The community responded negatively to Scottish Water's plans, arguing that replacement of the existing plant with septic tanks reflected a backward step and would result in deterioration in local water quality, with impacts on the environment, recreational users of the sea and local shellfish interests.

At the time of original engagement, there were no relevant environmental, bathing water quality or shellfish designations in place. The community therefore began to explore options for obtaining designations.

In response to challenge via the community, supported by media and political stakeholders, Scottish Water agreed in autumn 2016 to put its plans on hold until a decision was taken on applications which the community had made for Bathing Water status for the Gairloch and Sand beaches. The Cabinet Secretary approved the designation of these bathing beaches in December 2016.

### **Scottish Water revised proposals**

Following on from earlier informal updates to the community, Scottish Water held an information event and attended a Community Council meeting to discuss updated proposals on 11 September 2017. A disc filter and UV treatment have been added to the plans to provide tertiary treatment to the effluent. It was explained that a revised application to amend the CAR licence for Gairloch WWTW had been submitted to SEPA in order to meet the new bathing waters environmental standard. The expectation was that Scottish Water's revised discharge licence would require operation of tertiary treatment during the bathing season.

### **Further feedback from stakeholders**

The main theme from both meetings with the community, and from campaigning activity since, is that the community wishes to challenge the seasonal nature of the tertiary treatment proposed. The main issues highlighted are:

- The persisting view that the plans reflect a reduction in the level of final effluent treatment from the level that has been provided by the membrane plant
- The view that the plans are at odds with the recent creation of the Wester Ross Biosphere Reserve; and the presence of nearby SWT 'snorkel trail' sites<sup>1</sup>.
- Concern that the plans represent a risk to a fragile tourist economy which is dependent on efforts to extend the tourist season
- The view that recreational use of the sea takes place outside the bathing season, including through wider use of wetsuits for wild-swimming, snorkelling, sea-kayaking etc
- Concern about impact on shellfish fishery (non-designated) and other industries which rely on perception of a high quality environment.

In addition to individual representations made to SEPA by the Community Council and others, an online petition has been signed by 7,853 people in around 3 weeks.

A Scottish Wildlife Trust (SWT) facebook account promoted the petition and suggested that it would be forced to 'shut' two sites in Loch Gairloch on its North West Highland Snorkel Trail if the plans went ahead. It is not clear whether this reflects the settled view of the SWT. One of the snorkel trail sites is between the WWTW outfall and Sand Beach (i.e. closer than the bathing beach).

In response to questions from the community about the level of cost associated with year-round tertiary treatment and the extent to which this influences decision-making, Scottish Water has provided a cost estimate. It is estimated that seasonal UV treatment would cost approximately £15,000 per annum to operate, while year-round UV treatment would cost approximately £40,000 per annum.

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<sup>1</sup> Scottish Water's view is that the plans present no risk of detrimental impact on the features of the Biosphere Reserve; and that the snorkel trail sites have no statutory basis

## **Renewable energy option**

Following a review of feedback from the community and other stakeholders, Scottish Water agreed in late 2017 to investigate the opportunity to install small-scale renewable electricity generation at the site in Gairloch, which could help to offset some of the financial and carbon costs linked to extended operation of UV treatment at the site. It proposes to carry out a feasibility study to develop this option further in response to feedback about the particular set of circumstances at Gairloch, building upon earlier work that was done by Scottish Water Horizons to consider the potential for wind generation at the site (operating with the existing WWTW which has significant year-round energy demand).

In exploring this option, Scottish Water is mindful that its approach at Gairloch should not create a precedent for extended UV treatment at other WWTW sites, where this would not deliver a public benefit in proportion to the associated cost to customers and the environment (via carbon impact).

The rationale for pursuing renewable power generation at the site, if it is found to be financially viable, is that:

- Scottish Water is seeking to respond to the community's desire to sustain the historic level of waste water treatment via the membrane plant, while still delivering better long term value for customers and the environment than continuing with the existing technology;
- Scottish Water recognises the investment that has been made by stakeholders in the nearby snorkel trail, which is as a pre-existing (although informal / non-statutory) site of environmental and recreational interest that is closer to our outfall than the bathing beaches;
- Scottish Water believes that the small size of the WWTW, the site's good wind resource and relative remoteness from housing means there may be an opportunity for renewable generation to contribute to a solution that is acceptable to local stakeholders and reflects its broader obligations to customers and the environment.

## **Next steps**

Following SEPA's determination of Scottish Water's application to amend its discharge licence at Gairloch, reflecting the new bathing waters environmental standard, SW now proposes to commission further feasibility work on the renewable generation option that has been identified; and to update the community on its conclusions as soon as possible.

If this option is pursued, Scottish Water would seek to agree an operating regime for UV treatment at the site with pragmatic provision for maintenance requirements and operational response during the periods when tertiary treatment is not required by licence. This approach would reflect Scottish Water's commitment to listening and working positively with stakeholders where there is opportunity to do so.





[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 May 2018 10:04  
**To:** [REDACTED]  
**Subject:** FW: Gairloch - Draft Mission Plan  
**Attachments:** Gairloch comms and engagement plan - March 2018 v1.docx

-----Original Message-----

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 19 March 2018 15:11  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Gairloch - Draft Mission Plan

[REDACTED]

As discussed - DRAFT plan. We will pause until end of the week to hear if there is any concern from Ministers.

Regards

[REDACTED]

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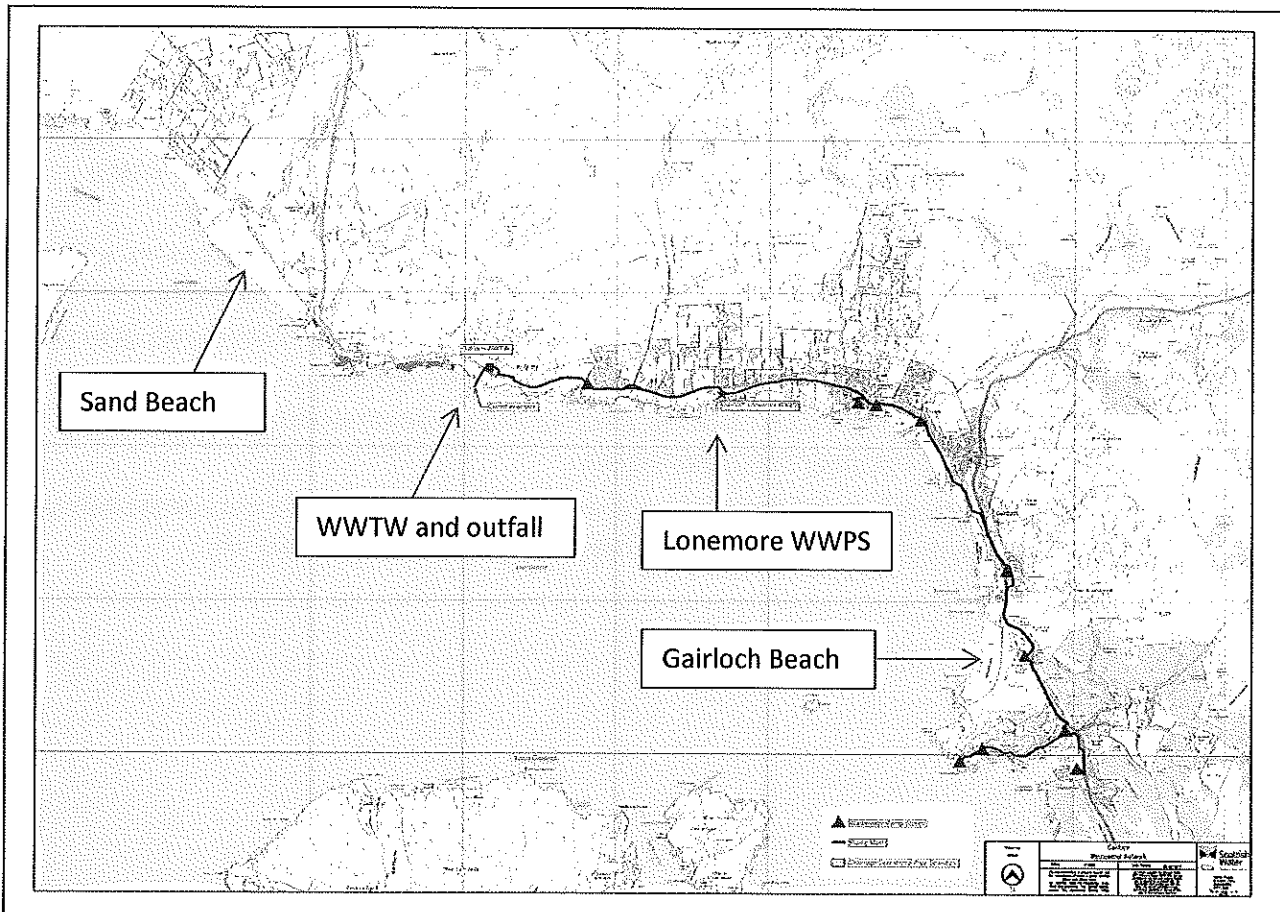
# Gairloch Communications and Engagement Plan – March 2018

## Context

Since 2015, Scottish Water has been engaging with the local community about investment plans for the Waste Water Treatment Works in Gairloch, Wester Ross, which serves a population of around 1,000 customers.

The existing WWTW is a membrane bioreactor plant which was installed in 2002. The community's perception, reflecting information provided at the time of its construction, is that the plant provides a high standard of sewage treatment. However, the plant has been unreliable in operation and is not able to treat the flows that were originally expected. At times of higher flows, this results in screened, untreated wastewater being discharged at Lonemore.

Scottish Water originally proposed to replace the plant with 3 septic tanks. The community campaigned against this – and ultimately obtained bathing water designations for two local beaches. Scottish Water proposals were then revised to include seasonal UV treatment and further engagement took place with the community. Feedback from this reflected that the community remained unhappy and wished to maintain year-round enhanced treatment. This position has been amplified following SEPA's decision to approve Scottish Water's application to amend its discharge licence.



## **Engagement plan**

The goal of this plan is to mark a clear change in approach from Scottish Water; and establish constructive engagement with key stakeholders in the community about an acceptable way forward.

The key elements of the plan are:

1. To recognise the key reason for the community's dissatisfaction with Scottish Water's proposals;
2. To propose the installation of renewable generation capacity at Gairloch WWTW to help offset financial and carbon cost of extended UV treatment;
3. To set out an approach to agreeing a long term operating regime for the site, built around a shared appreciation of the issues and evidence;
4. To propose establishment of a quarterly stakeholder steering group to oversee relevant studies / evidence-gathering;
5. To work towards a long term plan, focused on the common goal of maintaining and improving water quality in the Gair Loch.

## **Headline messages**

- Scottish Water recognises that the community has had strong concerns about our proposals to change waste water treatment in Gairloch. We want to apologise that we have not so far been able to address these concerns
- We are committed to working with the community to ensure that the high quality of the coastal waters around Gairloch is enhanced, and not harmed, by the investment we are making
- We want to work closely with local stakeholders so that everyone can have confidence in the work that is planned; and the way the Waste Water Treatment Works will be operated in future
- We propose to develop renewable energy generation capacity at our site which will enable us to offset some of the financial and carbon cost associated with extending UV treatment
- We also propose to set up a stakeholder steering group to bring together representatives of the community, campaigners and other local stakeholders
- The group will have a key role in building a better understanding of water quality outside the bathing season in order to inform a decision on long term operating arrangements for our site

## Programme of initial communication and engagement

Activity	Stakeholders	Key messages
<p><b>w/c 19 March</b> Confirm desired membership / chair of Stakeholder Group and approach key participants</p>	<ul style="list-style-type: none"> <li>• Maree Todd MSP?</li> <li>• Rhoda Grant MSP?</li> <li>• Ward councillors and Ward manager</li> <li>• Community Council</li> <li>• 'This is Gairloch' campaign group</li> <li>• SWT</li> <li>• Fishing rep?</li> </ul>	<ul style="list-style-type: none"> <li>- Summary of purpose of stakeholder group / SW commitment to meaningful ongoing engagement</li> </ul>
<p><b>w/c 26 March</b> Announcement via press release / media / digital content of Scottish Water proposed approach</p> <ul style="list-style-type: none"> <li>- Inc video and interview opportunity in Gairloch</li> </ul>	<ul style="list-style-type: none"> <li>• Media</li> <li>• All local stakeholders</li> <li>• Customers</li> </ul>	<ul style="list-style-type: none"> <li>- Establish key messages</li> <li>- Set new context for work of stakeholder group</li> </ul>
<p><b>w/c 23 April</b> Target date for first meeting of Stakeholder Group</p>	<ul style="list-style-type: none"> <li>• Stakeholder Group</li> </ul>	<ul style="list-style-type: none"> <li>- Agree purpose and remit of stakeholder group</li> <li>- SW to outline key reasons why membrane plant requires to be replaced</li> <li>- SW to outline proposed way forward</li> </ul>
<p><b>May 2018 – summer update</b> Brief update to wider community via postcard, potentially encompassing pre-season cycle campaign messages?</p>	<ul style="list-style-type: none"> <li>• Stakeholder Group</li> <li>• Customers</li> </ul>	<ul style="list-style-type: none"> <li>- Key messages</li> <li>- Build confidence in SW commitment to stakeholder group and its work</li> </ul>



[Redacted]

**From:** [Redacted]  
**Sent:** 24 April 2018 12:26  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** Gairloch

Dear All

Just a short note to inform you that I have spoken to [Redacted] about chairing the proposed stakeholder group. [Redacted] has confirmed [Redacted] is happy to do so which is good news.

The Community Council are also nominating a couple of names and SEPA have confirmed support too. We await some potential dates from the MSP in order that we can arrange the first meeting.

Will keep you posted.

Regards

[Redacted]  
[Redacted]  
[Redacted]  
Scottish Water  
[Redacted]  
[Redacted]

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### 2. Financial Statements

The financial statements should be prepared in accordance with the applicable accounting standards. This includes the balance sheet, the profit and loss account, and the cash flow statement. Each statement should be supported by the necessary evidence and should be signed by the responsible officer.

3. The final part of the document outlines the requirements for the annual financial statements. These statements must be prepared and submitted to the relevant authorities by the specified deadline. It is the responsibility of the responsible officer to ensure that all requirements are met and that the financial statements are accurate and complete.



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 May 2018 10:43  
**To:** [REDACTED]  
**Subject:** FW: Gairloch - response to Ministerial letters

[REDACTED]  
[REDACTED]  
Water Industry Team  
Scottish Government  
[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 March 2018 10:48  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Gairloch - response to Ministerial letters

[REDACTED]

As you'll appreciate, Ministers have received a large volume of correspondence on Gairloch. This is now reaching the final dates for issuing a reply.

We have prepared the following draft reply in response to a letter to [REDACTED]. However it will also form the basis for all other replies too. Grateful for any comments that you may have.

I note in a number of pieces of the correspondence that we have received that the Community does not understand how septic tanks work or the fact they provide a form of secondary treatment. They also do not appreciate that what is proposed is plant that can deliver primary, secondary and tertiary treatment. It is clear that they seem to have concluded that a septic tank is a holding tank that will spill its raw contents (bits and all) once it is full. Are you able to address this in your communications with the Community? We were tempted to set this out in the attached – happy to do so if SW or SEPA has a simple description of what septic tanks do.

Regards

[REDACTED]  
Tel [REDACTED]



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Cabinet Secretary for Environment, Climate Change and  
Land Reform  
Roseanna Cunningham MSP



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

T: 0300 244 4000  
E: scottish.ministers@gov.scot

Ms Rhoda Grant MSP  
The Scottish Parliament  
EDINBURGH  
EH99 1SP

Our ref: 2018/0007825  
19 April 2018

*Dear Rhoda,*

Thank you for your email of 28 February 2018 on behalf of constituents in Gairloch regarding Scottish Water's plans for the wastewater treatment works (WwTW).

I share your objective to ensure that the waters fully meet the environmental standards required by the Bathing Water Directive and continue to be an invaluable resource to the community and the many visitors attracted there by those waters.

Following further discussions between Scottish Government, Scottish Water staff and SEPA, Scottish Water has decided to withdraw its application for a revised CAR licence for wastewater treatment at Gairloch. Scottish Water has decided that for the time being it will continue to seek the optimal operation of the existing membrane plant until future options are decided.

Scottish Water also wish to undertake further work collectively to satisfy stakeholders that any changes to wastewater treatment arrangements will secure the required environmental performance and build upon information already compiled. This work and the associated monitoring regime will further assist to reassure all parties that a future solution, including appropriate operational practices, can help achieve the desired outcomes for the area. This reflects the fact that the bathing waters at Gairloch have only recently been designated by Ministers as a bathing water.

It will be helpful to this process if a local stakeholder steering group under a suitable independent chair could be established to work with Scottish Water and SEPA on the long-term approach to securing the desired water quality at Gairloch. Similar groups are in place at some other bathing waters and those approaches can be built on in this case.

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[www.gov.scot](http://www.gov.scot)



This group should bring together representatives of the community and other local stakeholders and should have a key role in building a better shared understanding of local water quality, the factors that influence it and the role the community itself can play in reducing the risks to that quality. All monitoring and other relevant information should be shared with the group and this will help it inform decisions on the long-term arrangements.

On this basis I am confident that Scottish Water, SEPA and the community can work together to ensure that the waters meet the required standards on a continuing basis and remain an invaluable asset to the local community and its economy.

*Yours*

*Roseanna*

**Roseanna Cunningham**

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[www.gov.scot](http://www.gov.scot)



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 24 May 2018 10:43  
**To:** [REDACTED]  
**Subject:** FW: Gairloch - response to Ministerial letters

[REDACTED]  
[REDACTED]  
Water Industry Team  
Scottish Government  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 22 March 2018 11:43  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Gairloch - response to Ministerial letters

[REDACTED]

We have agreed with the Cab Sec's Private Office to sit on all of the correspondence until the Cab Sec has had an opportunity to consider the advice provided and to decide whether or not to call in SEPA's decision on the licence application.

As soon as we are clear on the way forward, we'll let you know. We'll also send you and [REDACTED]'s team copies of the correspondence to the local MSPs once they have been issued.

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 21 March 2018 13:21  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Gairloch - response to Ministerial letters

[REDACTED]

Thanks for your comments.

We are due to provide a draft to the Cab Sec on a number of these letters. She then has, in theory, 10 working days to issue them. Cab Sec is usually very good at sending out replies within the deadlines.

However, this is slightly more complicated as Ministers have to decide whether or not to call in the licence application and whether they are satisfied with the suggestion that the bathing waters should be monitored as a basis for deciding whether tertiary treatment is necessary. It may be that the letters need to be redrafted in the light of those decisions. I intend to speak to the Cab

Sec's private secretary to explain the interdependencies. I will also ask if they can tell us when the letters are issued so that you can factor that into your comms plan.

It did occur to me that you have probably already tried to explain the situation regarding the operation of a septic tank. We're getting correspondence from all sorts of places about this...eg Milan, Italy!! Many of the letters indicate that the correspondence is from second home/self-catering owners who don't normally live in Gairloch. I'm sure that you're getting plenty of correspondence anyway, but if it helps, we could list the issues raised.

Regards

[REDACTED]

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 21 March 2018 13:05  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Gairloch - response to Ministerial letters

Hi [REDACTED]

Can I suggest an alternative wording for the second half of the final paragraph:

However I am requesting that Scottish Water undertakes the monitoring necessary to establish the water quality in the loch 12 months of the year and that this is maintained when the new treatment process is put in place.

We'll look to build in an explanation of septic tanks in future comms, although in fairness to previous attempts, it's a difficult message to land with rural people who (unhelpfully) know something of septic tanks.

Can I ask when you intend to respond to these letters?.. just for awareness and any impact on our comms plan

[REDACTED]

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 21 March 2018 10:48  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Gairloch - response to Ministerial letters

[REDACTED]

As you'll appreciate, Ministers have received a large volume of correspondence on Gairloch. This is now reaching the final dates for issuing a reply.

We have prepared the following draft reply in response to a letter to [REDACTED]. However it will also form the basis for all other replies too. Grateful for any comments that you may have.

I note in a number of pieces of the correspondence that we have received that the Community does not understand how septic tanks work or the fact they provide a form of secondary treatment. They also do not appreciate that what is proposed is plant that can deliver primary, secondary and tertiary treatment. It is clear that they seem to have concluded that a septic tank is a holding tank that will spill its raw contents (bits and all) once it is full. Are you able to address

this in your communications with the Community? We were tempted to set this out in the attached – happy to do so if SW or SEPA has a simple description of what septic tanks do.

Regards



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[REDACTED]

---

**From:** [REDACTED] >  
**Sent:** 12 August 2016 15:44  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: MACCS - Gairloch

[REDACTED]

Thank you for your email about Gairloch.

The following is a statement prepared for contacts already received:

*Protecting the environment is a top priority – now and in the future. We are planning £800,000 of investment to improve the reliability and sustainability of Gairloch Waste Water Treatment Works. The facility will meet the current environmental discharge quality requirements - which are required of us - and would be installed in a manner that would allow additional treatment to be added if required in the future.*

*We understand the community's concerns and are aware of their desire to gain bathing status for their beaches. Scottish Water will continue to work closely with SEPA to ensure that the waste water treatment works meets required standards. In the event of the waters being given Bathing Water status, we would take the necessary steps to ensure compliance with the relevant standards. We will also continue to liaise with the community.*

*As a result of the proposed current investment, the site would require less electricity and vehicle movements, with reduced noise and visual impact.*

I hope this helps.

Regards

[REDACTED]

[REDACTED]

Scottish Water

Tel: [REDACTED]

Mob: [REDACTED]

[www.scottishwater.co.uk/listening](http://www.scottishwater.co.uk/listening)

---

**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 12 August 2016 14:45  
**To:** [REDACTED]  
**Subject:** MACCS - Gairloch

[REDACTED]

Please see the attached letter.

Can you provide any information on the issue?

Thanks for your help, our deadline is 19 August 2016.

Regards,

Water Industry Team  
Scottish Government

\*\*\*\*\*

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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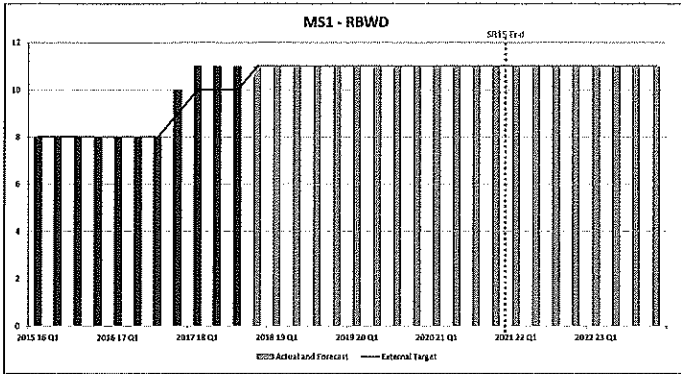


[REDACTED]	[REDACTED]
<b>Summary:</b>	[REDACTED]
<b>Ministers' Objectives:</b>	[REDACTED]
<b>Customer impact:</b>	[REDACTED]
<b>Delivery Plan 2015-21:</b>	[REDACTED]
<b>Cost Impact:</b>	[REDACTED]
<b>OMD impact:</b>	[REDACTED]

<b>SR15-046</b>	<b>Gairloch WwTW – Bathing Water</b>
<p><b>Summary:</b> Given the recent designation of Gairloch as a bathing water, Scottish Water and SEPA agree that the treatment process at Gairloch WwTW now requires to address bacteriological compliance and therefore needs to be upgraded in order to meet Bathing Water Directive (76/160/EEC) continuous discharge. This will involve UV treatment of the discharge from the WwTW.</p> <p><b>Ministers' Objectives:</b> No change to Ministers' objectives.</p> <p><b>Customer impact:</b> Community Council and MSP's have been active in seeking Bathing Water Designation to mitigate perceived reduction in treatment at this WwTW.</p> <p><b>Delivery Plan 2015-21:</b> Addition of 1 output to the Bathing Waters programme, increasing the number of outputs from 9 to 10.</p> <p><b>Cost Impact:</b> Estimated cost of £0.4 million.</p> <p><b>OMD impact:</b> This change will increase the 2016/17 OMD target by approximately 0.14 points. Future years will be captured in Scottish Water's Delivery Plan update.</p>	

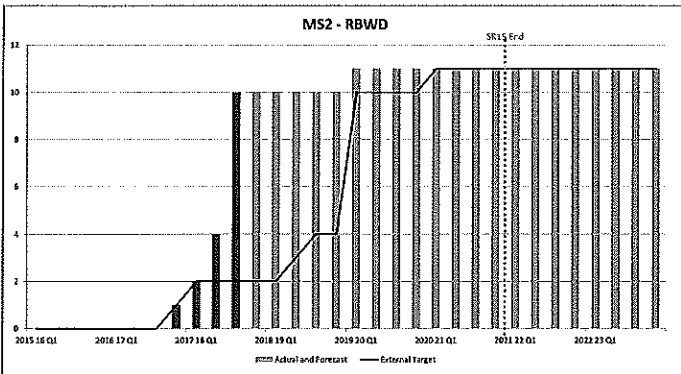


15 - Protecting and enhancing the environment - Studies to inform requirements under the revised Bathing Waters Directive - 2.9 OMD points



**MS1 - Feasibility**

Milestone Complete.

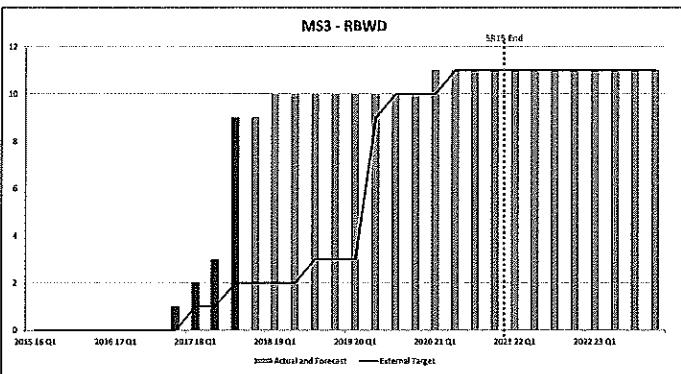


**MS2 - Approval of Financial Budget**

Achieved 10 against a baseline of 2.

6 outputs in relation to bathing water modelling claimed MS2 during Q3. Agreement reached with SEPA that these are 'no build' outputs for modelling Ayr (South Beach); Heads of Ayr; Irvine; Lunderston Bay; Prestwick; Seamill.

Approval of financial budget for Portobello was previously forecast for 2018/19 Q3 and is now 2019/20 Q1. This long sea outfall is specialist design and construction and study / review is needed to ensure value for money for customers.

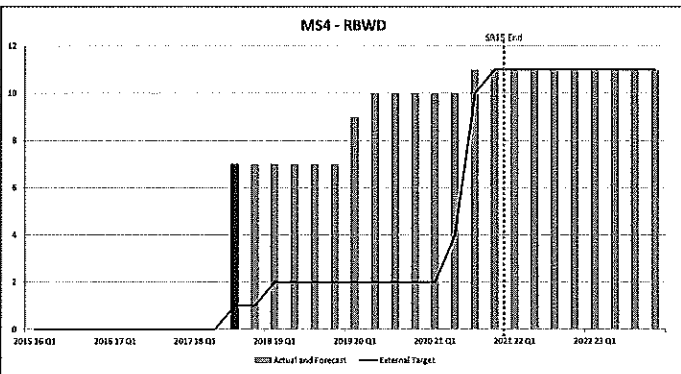


**MS3 - Start on site**

Achieved 9 against a baseline of 2.

Start on site claimed on 6 bathing water models as explained in MS2.

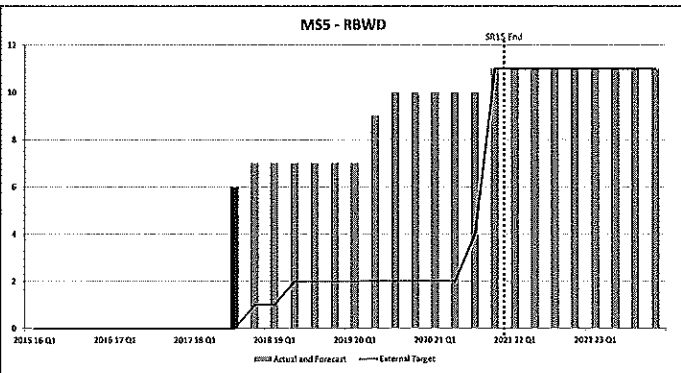
In addition to Portobello noted above, the forecast for Gairloch has moved from 2017/18 Q4 to 2018/19 Q1 to allow for the CAR licence to be achieved and the marine licence to follow.



**MS4 - Internal Acceptance**

Achieved 7 against a baseline of 1.

Internal acceptance claimed on 6 bathing water models as explained in MS2. Monifeith bathing water study also achieved internal acceptance in Q3.



**MS5 - Regulatory Sign-off**

Achieved 6 against a target of 0.

Regulatory sign off for 6 bathing water models has been achieved this quarter.





[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 28 October 2016 12:07  
**To:** [REDACTED]  
**Subject:** FW: MACCS - Gairloch  
**Attachments:** S20160034725.pdf; 161007 - [REDACTED]  
[REDACTED] 161013 - PJ - Gairloch.pdf

[REDACTED]

Thanks for your email.

I have attached a copy of recent correspondence with [REDACTED] and a recent report in the Press and Journal. I think these will give you the current position.

Regards

[REDACTED]

[REDACTED]

Scottish Water  
Tel: [REDACTED]  
Mob: [REDACTED]

[www.scottishwater.co.uk/listening](http://www.scottishwater.co.uk/listening)

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**From:** [REDACTED] [mailto:[REDACTED]]  
**Sent:** 27 October 2016 10:10  
**To:** [REDACTED]  
**Subject:** MACCS - Gairloch

[REDACTED]

Please see the attached letter.

Is there an updated position for the work at Gairloch?

Thanks for your help, our deadline is 17 November 2016.

Regards,

[REDACTED]

[REDACTED]

Water Industry Team  
Scottish Government  
[REDACTED]

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Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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From: [REDACTED]  
Sent: 17 October 2016 14:45:27  
To: Ministerial Correspondence Unit  
Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform  
Subject: FW: Loch Gairloch Pollution

Hi,

This ones for MACCS please.

Kind Regards

[REDACTED]  
[REDACTED]  
Roseanna Cunningham, MSP Cabinet Secretary for Environment, Climate Change and Land Reform  
[REDACTED]

Tel: [REDACTED]  
Email: CabsecECCLR@gov.scot<mailto:CabsecECCLR@gov.scot>

[cid:image001.png@01D22885.18340730]<http://home.scotland.gov.uk/home>

From: [REDACTED]  
Sent: 17 October 2016 14:14  
To: Cabinet Secretary for the Environment, Climate Change and Land Reform  
Subject: Loch Gairloch Pollution

Dear Roseanna,  
I apologise if the first email was delivered at the wrong address, an automated response stated that 'If you are contacting Roseanna in her Cabinet Secretary capacity please email CabSecECCLR@gov.scot<mailto:CabSecECCLR@gov.scot>.' It would perhaps be a good idea for the Scottish Parliament website to provide both emails initially to avoid future confusion.

My concern is as follows. What is going on with SEPE and Scottish Water? The latest cost-cutting idea by Scottish Water to submit a CAR application to SEPA for a licence to discharge unfiltered bacteria-laden effluent into Gairloch bay defies belief!

What is even more concerning about this development is the lack of media exposure it has attracted. One would expect that bathing in one of the most remote and stunningly beautiful areas of North West Scotland would be a safe bet. It now begs the question, where else have tourists including ourselves, bathed or paddled in Scotland, in waters that harbour invisible but potentially lethal bacteria?

For Scottish Water even to have the audacity to propose such a change at Gairloch signals a 'out of sight, out of mind' attitude that has plagued the Highlands for centuries. The people of the Highlands really do not deserve such poor treatment!

I am sure Rhona, that you like me enjoy holidaying and relaxing in Scotland, enjoying the purity of God's creation and the natural landscape. Let us hope this decision to

pollute Gairloch by potentially lethal bacteria is not given the go ahead, so that locals and visitors alike, can continue to bathe in Scotland's waters, without the fear of contracting any water borne diseases.

I have included an attachment from 'Save Scottish Seas' where I discovered the story.

Best Regards 

<http://www.savescottishseas.org/news/gairloch-beach-threatened-by-sewage-plan/#<http://www.savescottishseas.org/news/gairloch-beach-threatened-by-sewage-plan/>>

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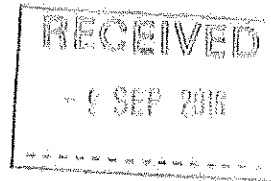
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The Scottish Parliament  
Pàrlamaid na h-Alba



Rhoda Grant  
Member of the Scottish Parliament for the Highlands & Islands  
Scottish Labour Spokesperson on Rural Economy and Connectivity

Mr Douglas Millican  
Chief Executive  
Scottish Water  
6 Castle Drive  
Carnegie Campus  
Dunfermline  
KY11 8GG

Our Ref: 01160240/OB

6 September 2016

Dear Mr Millican,

[REDACTED]

Thank you for your letter (25<sup>th</sup> August) replying to the concerns of the above constituents about the new sewage system proposed for Gairloch. I have received a number of complaints about the plans.

It is disappointing that Scottish Water has not reconsidered its proposals in the light of public opposition – an extended outfall pipe does not appear to be the solution the community was hoping for.

I realise when any new scheme is mooted there is usually a range of options put before the board. Was this the only scheme to be proposed by engineers or were there other options put forward? If there were other options I would be grateful if you could send me the information on each possible scheme and the projected cost.

I note that the investment is £800,000 for 1,000 customers and that the new system will save electricity costs. However, I believe it would be a backward step to put in place a scheme that the community is against, particularly as Scottish Water is still owned by the public.

Best wishes

Yours sincerely

Rhoda Grant MSP

The Scottish Parliament Holyrood Edinburgh EH1 1SP T: 0131 348 5766  
PO Box 5717 Inverness IV1 1YT T: 01463 716299  
38 Church Street Stornoway HS1 2JE T: 01851 709822



[www.himsp.org.uk](http://www.himsp.org.uk)  
[Rhoda.Grant.msp@parliament.scot](mailto:Rhoda.Grant.msp@parliament.scot)



RhodaGrant



MSPRhodaGrant

13 September 2016



**Scottish  
Water**

Trusted to serve Scotland

Rhoda Grant MSP  
PO Box 5717  
INVERNESS  
IV1 1YT

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6 Castle Drive  
Carnegie Campus  
Dunfermline  
KY11 8GG

T: 01383 848272  
F: 01383 848371

[www.scottishwater.co.uk](http://www.scottishwater.co.uk)

Dear Ms Grant

  
**Your Ref: 01160240/OB**

I acknowledge receipt of your letter as received by Douglas Millican's office.

Thank you for bringing the issue to our attention. A fuller response will be issued as soon as possible.

Yours sincerely



7 October 2016



**Scottish  
Water**

Trusted to serve Scotland

Rhoda Grant MSP  
PO Box 5717  
Inverness  
IV1 1YT

Castle House  
6 Castle Drive  
Carnegie Campus  
Dunfermline  
KY11 8GG

T: 01383 848272  
F: 01383 848371

[www.scottishwater.co.uk](http://www.scottishwater.co.uk)

Dear Ms Grant

[REDACTED]  
**Your Ref: 01160240/OB**

Thank you for your letter to our Chief Executive Douglas Millican. As Douglas is on annual leave, I am responding on his behalf.

I am sorry to hear that you have received a number of complaints about Gairloch Waste Water Treatment Works. I would like to assure you that we take the concerns of the communities in which we work very seriously and it is important to us that we maintain the trust and confidence of everyone we serve.

Since your last correspondence from Scottish Water the community of Gairloch has submitted applications to SEPA for bathing water status at Gairloch and Big Sands. As a result we have taken the decision to put our plans for Gairloch WWTW on hold while we review the technical options available to us to meet a possible new designation. We will of course keep the community and stakeholders updated as we progress the review.

If you would find it useful, I would be happy to meet with you in Parliament to discuss this matter further. I would also be happy to take you through the costed options you have requested although, as I am sure you will appreciate, those may no longer be as directly relevant.

Yours sincerely

[REDACTED]  
[REDACTED]  
[REDACTED]





# Sewage plant plans put on hold

**Water: Residents and politicians have fears over impact on west coast's beaches**

BY DAVID KERR

Controversial plans for sewage treatment at a Wester Ross village have been put on hold.

Scottish Water has confirmed it has put its proposal for a new plant at Gairloch on the back burner while an application aimed at safeguarding the area's beaches is considered.

Locals and politicians had raised concern about the possible impact from the sewage treatment plans on some of the west coast's best beaches.

The community in Gairloch has applied to the Scottish Environmental Protection Agency (Sepa) for bathing water status at Gairloch and Big Sand, which would entitle them to greater protection.

A spokesman for the utility company said it was pausing the process to consider technical options which would allow the proposed plan to meet standards if the designation is granted.

A Scottish Water spokesman said: "We take the concerns of the communities we serve very seriously.

"An application for bathing water designation as been submitted to Sepa for Gairloch and Big Sands by the community.

"As such, plans for a new waste water treatment works are on hold pending a review of the technical

options available to us to ensure the site will meet regulatory targets should the new designation be approved."

The public water authority has been planning to spend £800,000 on a new sewage treatment process at Gairloch Wastewater Treatment Works, which

serves around 1,000 customers.

However, several residents objected to the proposed end of a membrane

process at the Fhasaich plant which currently produces an effluent described as "virtually" pure while removing harmful bacteria.

They argue a new septic tank system will release untreated effluent into the loch and will downgrade the system, reducing the

water quality for bathing, snorkeling, sailing and canoeing, important earners during the tourist season for the village.

Highlands and Islands MSP Rhoda Grant wrote to Scottish Water after receiving complaints from villagers about the proposal.

She said: "Although Scottish Water has offered to go through the original options with me, I will await the outcome of its review to see if it comes up with plans that are more agreeable to the community," she said.

"When I first took this up on behalf of constituents, the water authority did not

appear to shift from its original proposals which had received planning approval in March. So, this is a welcome step forward. The community deserve praise for pursuing this.

"Gairloch is such a beautiful location and its waters deserve to have the best sewage treatment available."

**"Plans on hold pending a review of the technical options available"**





**CONCERNS:** Locals have the interest of the coastline at heart as they object to the sewage treatment facility

Ref: 118101913



[REDACTED]

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** 10 April 2018 11:49  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Gairloch  
**Attachments:** Draft letter to Dame Susan Rice - draft AT comments (5).docx

[REDACTED]

Attached is the amended draft following our conversation. I will start to get prepared for us to announce this to the community and stakeholders on Thursday at 9am (as per your email) but only after you have confirmed agreement with the Minister tomorrow.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

Scottish Water

[REDACTED]

---

**From:** [REDACTED] <[mailto:[REDACTED]]>  
**Sent:** 10 April 2018 11:09  
**To:** [REDACTED]  
**Subject:** RE: Gairloch

OK standing by

---

**From:** [REDACTED] <[mailto:[REDACTED]]>  
**Sent:** 10 April 2018 11:04  
**To:** [REDACTED]  
**Subject:** FW: Gairloch

Hi [REDACTED]

I have drafted the attached for discussion. I will call you in 5 mins to discuss.

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

Scottish Water

[REDACTED]

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**Draft letter to Dame Susan Rice**

I know that Scottish Water share my desire to do all that they can to achieve excellence in Scotland's bathing waters.

I have received many representations from the community at Gairloch who have expressed concern about potential changes to the waste water treatment and the implications for the local bathing waters.

I am pleased to learn that following further discussions between my officials, your staff and SEPA, Scottish Water has decided to withdraw its application for a revised CAR licence for waste water treatment at Gairloch. You have decided that for the time being Scottish Water will continue to seek the optimal operation of the existing membrane plant in the short term until future options are decided.

I understand that you wish to undertake further work collectively to satisfy stakeholders that any changes to wastewater treatment arrangements will secure the required environmental performance and build upon information already compiled. This work and the associated monitoring regime will further assist to reassure all parties that a future solution including appropriate operational practices can help achieve the desired outcomes for the area. This reflects the fact that the bathing waters at Gairloch have only recently been designated by Ministers as a bathing water.

I consider that it will be helpful to this process that a local stakeholder steering group under a suitable independent chair should be established to work with Scottish Water and SEPA on the long term approach to securing the desired water quality at Gairloch. Similar groups are in place at other bathing waters and those approaches can be built on in this case. This group should bring together representatives of the community and other local stakeholders and should have a key role in building a better shared understanding of local water quality, the factors that influence it and the role the community itself can play in reducing the risks to that quality. All monitoring and other relevant information should be shared with the group and this will help it inform decisions on the long term arrangements.

On this basis I am confident that you, SEPA and the community can work together to ensure that the waters meet the required standards on a continuing basis and remain an invaluable asset to the local community and its economy.

**ROSEANNA CUNNINGHAM**





**Output Monitoring Group Working Group  
Minute of Meeting 54, Thursday 9 February 2017, 09:30  
Venue: Scottish Water, Castle House, Dunfermline**

Present:

[REDACTED], Chair, Scottish Government  
[REDACTED], Scottish Government  
[REDACTED], WICS  
[REDACTED], WICS  
[REDACTED], WICS  
[REDACTED], SEPA  
[REDACTED], Scottish Water  
[REDACTED], Scottish Water  
[REDACTED], Scottish Water  
[REDACTED], Scottish Water  
[REDACTED], Scottish Water  
[REDACTED], DWQR  
[REDACTED], CAS

**ITEM 4 – Change Proposals (54/02)**

- **SR15-046** – Adds an output to the bathing water programme following designation of the bathing waters at Gairloch. SW is required to add additional treatment to discharges at an additional cost of £0.4m, although this does not include the outfall if required. [REDACTED] queried the process to identify and approve a new bathing water. [REDACTED] noted new bathing waters are typically proposed by the LA and approved by Ministers with advice from SEPA - if a number of people use a beach it is expected it will be designated. [REDACTED] noted concern that designation can happen without considering the cost of providing appropriate treatment and whether this should be highlighted to Ministers.

**ITEM 9 – Bathing Waters Directive (54/08)**

1. [REDACTED] presented the paper. [REDACTED] confirmed that under the revised Bathing Water Directive, if a bathing water is classed as poor for 5 consecutive years, signs must be put up to advise against bathing. [REDACTED] highlighted that measures need to be in place by the 2019 bathing season for the failing bathing waters - 12 were rated as poor in 2016 and 7 were borderline sufficient. SEPA has developed 19 improvement plans for the bathing waters at risk of failure – this doesn't include Gairloch as no data is available at present. The plans have been shared with SG, local authorities and SW.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is crucial for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent data collection procedures and the use of advanced analytical techniques to derive meaningful insights from the data.

3. The third part of the document focuses on the role of technology in data management and analysis. It discusses how modern software solutions can streamline data collection, storage, and analysis, thereby improving efficiency and accuracy.

4. The fourth part of the document addresses the challenges associated with data management, such as data quality, security, and privacy. It provides strategies to mitigate these risks and ensure that the data remains reliable and secure.

5. The fifth part of the document concludes by summarizing the key findings and recommendations. It stresses the importance of ongoing monitoring and evaluation to ensure that the data management processes remain effective and up-to-date.

