

*From the President*

21 September 2012

Mr Scott Shearer  
Assistant Planning Officer  
Planning and Regulatory Services  
Environment and Infrastructure  
Scottish Borders Council

*By email*



**The  
Geological  
Society**

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Dear Mr Shearer

**Planning application 12/00929/FUL: Installation of pump house and associated works for effluent discharge, Old Cambus, Berwickshire**

I am writing with regard to concerns which have been raised by a number of Fellows (members) of the Geological Society in relation to the above planning application for permission to construct a pump house and pipeline near Siccar Point.

Siccar Point is designated as a Site of Special Scientific Interest (SSSI) and is a globally significant geoheritage site. It is famous as the location of 'Hutton's Unconformity', which as early as 1788 provided crucial evidence for the emerging uniformitarian theory of geology and about the age of the Earth. Near-vertical Silurian rocks are overlain by gently dipping Old Red Sandstone strata from the younger Devonian period. The observations and deductions made by James Hutton, along with James Hall and John Playfair, epitomised Scottish Enlightenment thinking and helped to define the modern discipline of geology.

We recognise that the proposed pipeline would cross the foreshore about 150m to the east of Siccar Point, discharging into the sea below the mean low water spring (MLWS), and that this is outside the boundaries of the SSSI. Nonetheless, its construction and burial in concrete may have an adverse visual impact on visitors' appreciation of the Siccar Point site. The area attracts tourists, in large part because of its beautiful and historically important geology. It is also renowned worldwide as a location for field visits by students and professional geoscientists. Any visual impact on the site would be deleterious to this major educational, amenity and heritage resource. A significant fall in visitor numbers due to actual or perceived impacts on the site would be disadvantageous to the local economy.

*Over 200 years of serving science & profession*

*Executive Secretary:*

Edmund Nickless BSc CGeol FGS FRSA

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Furthermore, judging from aerial photographs of the area, the proposed pipeline route appears to cut across geologically unstable (or potentially unstable) terrain sloping down to the foreshore. If this is the case, it is likely to make the construction and making good of the pipeline while minimising visual impact more difficult to achieve. The area may currently be unstable, but even if the visible signs of instability are historical, this may be reactivated as a result of disturbance caused by construction. Such instability might over time cause the pipeline to become exposed and possibly to rupture. In this eventuality, the visual impact at the site would be greatly exacerbated. If the Council is minded in principle to approve this application, we would strongly recommend that professional engineering geological advice is sought regarding the stability of the terrain, and any implications for construction and subsequent environmental impacts, which may affect significantly the cost of achieving and maintaining the proposed solution.

The Geological Society is the learned and professional body for geoscientists in the UK, and has more than 10,500 members in the UK and overseas working in academia, industry and government. It was founded in 1807 to serve the needs of the new emerging community of geologists, less than 20 years after Hutton's observations at Siccar Point, and is the oldest geological society in the world. The Society issued a public statement on the planning application on 5 September, which was amended on 12 September in light of developments during that time and further information which had come to our attention, and which is available on our website at

[http://www.geolsoc.org.uk/gsl/policy/policy\\_statements/page12181.html](http://www.geolsoc.org.uk/gsl/policy/policy_statements/page12181.html). We would be pleased to discuss further the points raised in this letter, and any matters of geoscience relating to the application.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Shilston', with a stylized flourish at the end.

David Shilston CGeol

President, The Geological Society