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

17/09/12

Dear Mr Shearer

Further to my email of 30/08/2012 I am writing on behalf of the Scottish Geodiversity Forum with fuller details of our objection to the planning application **12/00929/FUL | Installation of pump house and associated works for effluent discharge | Drysdale Old Cambus Cockburnspath Scottish Borders TD13 5XX.**

Siccar Point SSSI is an iconic site, without doubt the most important geological locality in Scotland and of immense international interest due to its association with James Hutton (1726-1797), the founder of modern geology. It is visited by hundreds of students and international visitors every year, and although it is not well known amongst the general public, by increasing numbers of local people taking advantage of the new Berwickshire Coastal Path.

We strongly object to the planning application to construct a effluent discharge pipeline on the coast directly adjacent to Siccar Point, for the following reasons:

**Visual appearance:** the proposed pipeline would be constructed across an unstable grass-covered slope and exposed bedrock in the intertidal zone. Although the pipeline would be buried, there would be substantial disruption on the grass slope and intertidal zone during construction, including in creating an access track across the slope. Substantial reinstatement works would be required to restore the slope, and even then the disturbed area of the slope will be prone to further slippage in the future. The concrete-filled trench across the bedrock would be very conspicuous from the viewing point above Siccar Point. This is a beautiful and unspoilt section of coast, part of the designated Berwickshire Coast Area of Great Landscape Value. The proposed pipeline trench would be the only man-made feature on the intertidal zone visible from above Siccar Point, and would be severely detrimental to the visual beauty of the area.

**Environmental impact:** We are deeply concerned about the potential impact of discharging dirty water and granulated vegetable waste into the coastal waters directly adjacent to Siccar Point. We understand that the details of the discharge point, filtration

and treatment of the waste will be subject to a discharge licence application to SEPA if planning permission is granted, so that the details of the discharge are not yet available. However we believe that it is possible that vegetable waste material would be washed up on the SSSI site at Siccar Point, at least some of the time, with associated negative impacts on the site, including visual impact, odour and promotion of vegetation growth on rock surfaces. If the final discharge point is further out to sea and in deeper water than the current plans show, it will be even closer to Siccar Point itself. We are concerned that discharge of waste water with a Chemical Oxygen Demand, and possibly solid material, into the sea next to Siccar Point will at times of low tidal flow create local anoxic conditions. At the very least detailed modelling and assessment of the proposed discharge needs to be carried out to ensure that Siccar Point is not affected by the discharge.

**Loss of economic opportunity:** Drysdale's vegetable processing factory is an important local employer, and has been a good neighbour to Siccar Point. We would like to see the business continue to thrive. However we recognise the immense value of Siccar Point as a magnet for visitors from across the world, and would support any local initiative that would encourage more visitor spend in the local area, for example in hotels, bed and breakfasts, cafes and restaurants, camping and caravan sites, farm and local shops, boat and tour operators. We believe that the plans for this effluent discharge pipeline will damage Siccar Point as a visitor attraction and that there is untapped potential for the local community to benefit in sustainable ways from this major site of international interest on their doorstep.

We urge the Scottish Borders Planning Committee to refuse this application, and suggest that the company should be asked to consider alternative methods of dealing with their waste. Discharging waste into the sea is an old-fashioned solution that risks irreparable damage to this Area of Great Landscape Value and to the local visitor economy.

Yours,

A handwritten signature in blue ink, appearing to read 'Angus Miller', with a long horizontal line extending to the right.

Angus Miller, Chair  
on behalf of the Scottish Geodiversity Forum