



Case reference	SMC-EDB-004
Application details	Upgrade to sewer
Site address	Holyrood Park – site near Waverley Park Terrace, Edinburgh (SM13032)
Applicant	Scottish Water
Determining Authority	Historic Environment Scotland (HES)
Local Authority Area	City of Edinburgh Council
Reason(s) for notification	Notification Direction 2015 – works to be granted Scheduled Monument Consent by Historic Environment Scotland go beyond the minimum level of intervention that is consistent with conserving what is culturally significant in a monument
Representations	Nil
Date notified to Ministers	25 June 2018 but not fully documented until 26 June 2018
Date of recommendation	11 July 2018
Decision / recommendation	Clear

Description of Proposal and Site:

Scheduled Monument Consent (SMC) is sought for upgrading a sewer near Waverley Park Terrace in Holyrood Park, Edinburgh. The sewer upgrade will be located at the bottom of the steps at Waverley Park Terrace, approx. 300m north from the base of Arthur’s Seat, in an area of parkland and trees known as the ‘Parade Ground’ The proposed works include the excavation of a sewer pipe trench, temporary access route for equipment via Spring Gardens, insertion of sewer upgrade pipe and the backfilling of trench and reinstatement of topsoil.



Holyrood Park scheduled area outlined in brown

The monument comprises the whole of Holyrood Park which has been associated with the royal household since the 12th Century (see above). The scheduled area includes all archaeological and historic sites and monuments within the park including the Palace of Holyroodhouse and ruins of Holyrood Abbey as well as boundary walls and gates. However, all the buildings in use within the park are excluded from the scheduling. Arthur’s Seat is also within a designated SSSI.



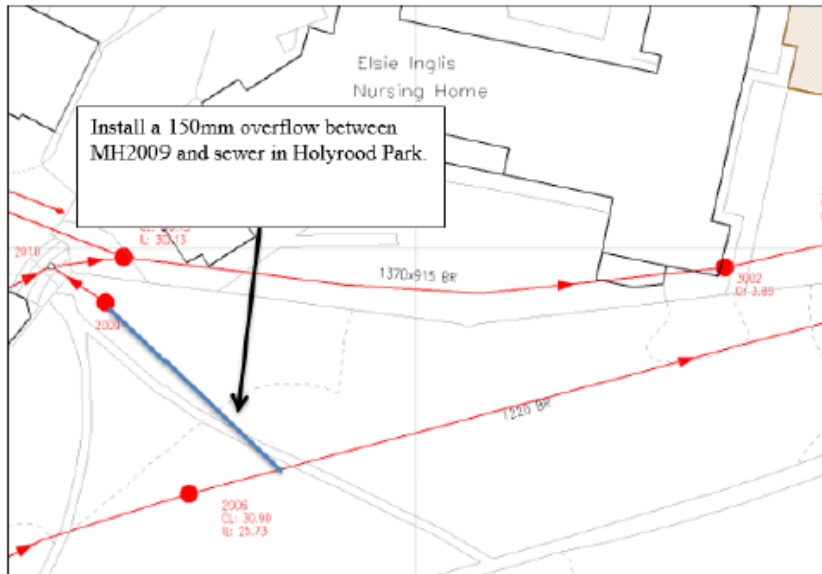
Location of proposed sewer works in Holyrood Park outlined in red (from project design)

Consultations and Representations:

- No representations were made during consideration of the application.
- PAD consulted Scottish Government Culture and Historic Environment Division following notification and they are content and have no further comment to make.

Assessment:

1. Historic Environment Scotland (HES) are minded to grant consent for the sewer upgrade ground works. However, as the proposed works to the monument have no direct conservation benefit, this goes beyond the minimum level of intervention which is consistent with conserving what is culturally significant in the monument. This is a significant departure from policy as set out in section 3.16 of HES's Policy Statement 2016.
2. The application has been submitted by Scottish Water and is intended to provide additional capacity for the sewer network serving the city centre, following the construction of a new development in Market Street.
3. HES undertook pre-application discussions with the applicant regarding the scope and timing of works, and this application accords with the outcome of those discussions. A meeting was held with HES, Scottish Water and the contractors, AOC Archaeology, on site on 24 April and the archaeological monitoring and excavation would be conducted by AOC Archaeology.
4. The physical impact of the works would be the excavation of a trench 40m in length, 5m wide and 5m deep to allow for the installation of a 150mm diameter sewer pipe to connect the existing Canongate and Holyrood sewers. The area to be excavated includes areas which have already been disturbed by the installation of existing sewers and a manhole chamber. The area not previously disturbed is approximately 10m x 5m and is about midway between the two sewers. (see below).



Routes of existing and proposed sewers (from project design)

5. HES acknowledge that within the undisturbed area, there is the potential for archaeological remains. The applicant has undertaken a geophysical survey of the area and no significant features have been detected. However, HES highlight that this, in itself, is not proof that features do not exist.
6. The excavations would remove any archaeological deposits and artefacts encountered and, as a result, would be destructive. HES consider in their report of handling that the trench dimensions are restricted to the minimum possible to achieve the project aims and cover a relatively small proportion of the scheduled monument. They also highlight that other potential locations for the sewer upgrade works were reviewed, but no viable alternative location for the proposed works was identified.
7. HES highlight that the works are required to enable an increase in the capacity of the sewer network in the city centre of Edinburgh. Without this additional capacity, computer modelling shows that there would be a high likelihood of flooding with potential public health risks and environmental damage.
8. Overall, HES conclude that as the works would be a controlled excavation within a relatively small part of the scheduled monument and the excavations are the minimum necessary to achieve the project's objective, this would leave the vast majority of archaeological deposits intact. As the works would not visually alter the monument, HES conclude that it would have a negligible effect on its overall significance and the works are in line with sections 3.16 and 3.18 of their Policy Statement.
9. HES seek to impose a condition that requires the applicant to develop a detailed reinstatement plan to be approved in writing by HES. This is to ensure that the works comply with paragraph 3.20 of their Policy Statement which requires that the site should be reinstated to an adequate standard to maintain public access to the park and visual amenity of the site.

10. In summary, as the objectives of the proposed work have been clearly set out and include significant public benefits such as an increased capacity of the sewer network and a reduction in the risk of potential adverse flooding incidents. HES consider that the works are in line with section 3.17 of their Policy Statement. However the proposed works are not considered the minimum necessary, consistent with conserving the cultural significance of the monument, hence why the requirement to notify Ministers.

11. In conclusion, the SMC does not raise any issues of national importance that would merit intervention by Ministers.

Decision/Recommendation:

- The application should be cleared back to Historic Environment Scotland to issue Scheduled Monument Consent with one condition.