Scheduled Monument Consent:
Report on Handling

Case information

Reference/Case ID	201602912

Scheduled Monument	Whitemoss Roman Fort, 175m SW of Rosarymount		
Index no	M1652	**Grid Ref**	NS418720 241800.0000 672000.0000

Date of Application	29 August 2016	**Application Received**	29 August 2016
Summary of proposed works	Replacement of concrete foundations and steel 'raker' bars of pylon (No. G037)		

1. Summary recommendation

This report recommends approval without conditions.

2. Background

The monument comprises the buried remains of a Roman fort and attached annex, visible from the air as cropmarks indicating the extent of the defensive ditches and some internal features. The fort falls within three separate fields that are currently used for pasture. Excavations of the fort in the 1950s confirmed it was of Antonine date and consisted of three possible phases.

The site is presently used as a training area for the adjacent riding stable complex. Two pylons of a 132kV overhead power line (OHL) lie within the scheduled area. The application concerns the pylon lying in the southwestern interior of the fort.

The applicant sought advice on the outline requirements for the application, and this has informed the material appended to the application.

The 1950s excavation trenches are not visible and their precise location cannot be ascertained. Land management includes regular scarifying of the turf layer, as evidenced by the present appearance of the field. There is also significant evidence of modern drainage features on the edge of the field.

3. Proposals

Inspection of the OHL has established that the pylon's bracing and raker bars (the main structural elements of the tower) need urgent replacement. This line links

Inverclyde to the rest of the Central Belt's electricity network. Replacing the structural elements also involves replacing the existing foundations into which the tower is set. These foundations take the form of four concrete pads lying in machine-excavated pits.

It is proposed to access the scheduled area using a 1.8-tonne mini-digger and a low-ground-pressure Argocat. The topsoil will be mechanically stripped from the surroundings of each foundation in a 1.5m square, to a depth of 600mm. This work will be carried out under an archaeological watching brief, and the sections will be recorded and cleaned.

The concrete foundation will then be broken out by hand using a Kango hammer or similar, with the steelwork and debris then being removed from the site. The exposed sections will then be shuttered prior to the pouring of a new concrete foundation and the erection of the new steelwork. The site shall then be tidied up to enable grass to regrow on the location of the foundations.

The applicant has provided a Written Scheme of Investigation by their archaeological advisor. This sets out a methodology for monitoring the mechanical stripping and excavation of the trenches (and metal-detecting of the spoil), and recording of any archaeological features or deposits uncovered during excavation. It also provides for the halting of works if any such features or deposits are encountered.

4. Representations received

No representations were received.

5. Report

a) Policy considerations

The application should be viewed with the following legislative and policy considerations in mind:

Ancient Monuments and Archaeological Areas Act 1979

Part 1 Section 2 - Control of works affecting an ancient monument.

Historic Environment Scotland Policy Statement (2016)

3.4. Scheduled monument consent is required for any works that would demolish, destroy, damage, remove, repair, alter or add to the monument or to carry out any flooding or tipping on the monument. It is a criminal offence to carry out any of these works without consent.

3.14. A monument is included in the Schedule to secure the long-term legal protection of the monument in the national interest, *in situ* and as far as possible in the state it has come down to us. Scheduled monuments have an intrinsic value as monuments, not related to any concept of active use. It is the value of the monument to the nation's heritage, in terms set out in the section on Scheduling in Chapter 2 of this policy statement that is the primary consideration in determining applications for scheduled monument consent.

3.16. Works on scheduled monuments should therefore normally be the minimum level of intervention that is consistent with conserving what is culturally significant in a monument.

3.17 As each monument will require treatment specific to its individual nature, characteristics, significance and needs, any proposed change to it must be fully and explicitly justified.

3.18. Scheduled monument consent applications must be considered in terms of the cultural significance of the monument and the impact that the proposals would have upon this cultural significance. The more important particular features of the monument are to its cultural significance, the greater will be the case against interventions which modify these features.

3.20. Where change is proposed, it should be carefully considered, based on good authority, sensitively designed, properly planned and executed, and where appropriate in the context of an individual monument, reversible.

b) Assessment

Cultural significance of the monument
The monument is of national importance because it has the inherent potential to contribute to our understanding of the past, in particular, the dating, construction and internal layout of Roman forts. This fort can tell us not only about the distribution of and relationships between Roman monuments and the surrounding landscape, but also specifically about the Antonine period occupation and the western defences of the Antonine Wall.

Physical impacts of the proposal
No previous archaeological work appears to have taken place within the footprint of the four foundations of the pylon, and there have been no reports of artefact finds as a consequence of that disturbance. Therefore, the considerable impact from the four original 3m square excavations has not been archaeologically mitigated.

The four proposed excavations will involve the excavation of 1.5m square trenches to a predicted depth of 600mm. The opinion of the applicant and their archaeologist is that these will exclusively involve the disturbance of backfilled material from the construction of the original pylons, but this cannot be supported by drawings or specifications of the original works. Therefore, there is a small but unquantifiable risk that undisturbed material on the periphery of the original founds may be disturbed.

This risk should be regarded as relatively low, as the original founds will have involved excavation of a wider trench than the dimension of the concrete base. Nevertheless, there is a residual risk of disturbance to archaeological features, deposits and associated material from the proposed excavations.

The vehicle access route has been indicated on the application mapping. This traverses a part of the field which has no upstanding topographic features, and will use low ground pressure vehicles as outlined above. The field sees periodic access by tractors and very frequent use by horses, and there is no evidence of soil erosion or rutting of the surface. On that basis, there will be no physical impact from the vehicle access and this issue is not considered further.

Impacts on the cultural significance of the monument
The pylon foundations lie just within the inner western ramparts of the fort, with the westernmost concrete pad probably lying on or immediately adjacent to the location of the inner bank. Internal structures are likely to be preserved below the ploughsoil.

The proposed excavations have the potential to disturb archaeological features, particularly in any exposed sections that might collapse inwards once the concrete found is exposed. However, it can reasonably be presumed that the compression and soil hardening that will have occurred since the original founds were constructed should mean that the risk from sectional collapse is very low. The main risk is therefore that the new trenches would clip the edges of undisturbed material in the section.

Mitigating factors
The applicant has provided a Written Scheme of Investigation (WSI) by their archaeological advisor. This sets out a full methodology for monitoring and recording the excavation work, as well as for halting the work if significant material is encountered prior to its archaeological resolution. The WSI adequately prescribes accepted professional standards for such work. If unexpected archaeological features or deposits are encountered, the presence of an archaeologist would mitigate the risk of damage occurring without recording.

Fundamentally, any damage to the fort is likely to have occurred historically as part of the OHL construction. The presence of an archaeologist offers an opportunity to record any undisturbed material that might be encountered as a result of the proposed work. There is also an unquantifiable possibility that no undisturbed material will be encountered, as the new founds will occupy the same area as the originals but involve less wide excavation. On balance, it is concluded that the impact on the scheduled monument would not be adverse if the works are archaeologically monitored.

c) Other material considerations, including impact of the works on Protected Species and Places

See separate Protected Species and Places Assessment. It is concluded that no Protected Species or Places would be impacted by these works.

d) Conclusion

The proposed works are not likely to have an adverse impact on the monument, as they affect a smaller part of the ground than the original foundation works are likely to have disturbed. They also represent an opportunity to recover at least some information on the archaeological nature of the fort at this location, and potentially to recover artefacts in the backfilled material. Therefore, there would be no residual risk of an adverse impact on the monument.

As such, the proposal is consistent with paragraph 3.16 of the HES Policy Statement, as outlined above. It is also consistent with paragraph 3.20 of the same document, as the application has been carefully considered, based on good authority and sensitively designed. On that basis, it is recommended that consent is granted for the proposal.

The applicant and their archaeological advisor have undertaken to give notice of the start of works and that the Data Structure Report would be delivered within 3 weeks of the completion of the monitoring activity. The WSI also proposes to involve HES in discussions about any significant finds and (if necessary) on post-excavation assessment and reporting. Compliance with archive and Treasure Trove submission is also as per expected professional standard. On that basis, it is not reasonable or necessary to attach any conditions for notification or reporting.

6. Recommended decision

The works proposed are considered acceptable in meeting the terms of national policy for scheduled monuments, and also accounting for other material considerations.

I recommend consent is **granted without conditions.**

7. Conditions

None

8. Approval

Officer	**John Malcolm**	**Date**	**07/09/2016**
Approved by	**John Raven**	**Date**	**09/09/2016**

Annex A – list of supporting documents

• Location plan	*Whitemoss_LP*
• Works Written Scheme of Investigation	*Whitemoss_WSI_160815*
• Works Risk Assessment	*Whitemoss_RA1109*
• Works Method Statement	*Whitemoss_S2612*