

Elizabeth McCrone
Director of Heritage
Historic Environment Scotland

Sent by email: elizabeth.mccrone@hes.scot

26th August 2021

Dear Ms McCrone,

New Town World Heritage Site and Communal Bin Hubs

We refer to your correspondence with New Town and Broughton Community Council [NTBCC] on the above matter, a copy of which has been furnished to us.

We too are writing to express our disappointment at the position which Historic Environment Scotland appears to be taking on this important issue.

While it was confirmed to NTBCC there has been no change to your position of supporting the existing gull-proof bag and recycling box service in the terrace streets and squares of the New Town because of their heritage quality, it appears that your view is that you have no basis to be involved unless there is a formal planning application or other statutory process.

It was also confirmed to NTBCC that the City of Edinburgh Council's intention to use Road Traffic Orders limits substantially the considerations which can be taken into account. It, therefore, appears very likely that the process will fail to take due and proper account of the serious and permanent impact on the character of Edinburgh's New Town and its outstanding universal value. That has certainly been the case up until now. The Council took a decision to stop a refuse collection service which had been carefully designed to fit the sensitivities of the New Town, without any prior consultation with yourselves or any apparent input from those with heritage expertise.

Even if the Council decides to carry out an EIA, which is by no means certain, self-evidently this whole process **totally fails** to properly consider Edinburgh's unique qualities.

From a very superficial review, we know that historic cities across the UK, Europe and beyond grapple with these issues and come up with imaginative solutions, without detrimental impact on historic character. That was exactly what the gull-proof bags achieved.

What we now fear is that, by following processes which give little weight to the historic environment, Edinburgh will implement a system of waste management which is totally unsuitable and the heritage bodies will only be able to achieve minor tinkering on location and bin design. **This would be a travesty in our view.** We are, therefore, writing

to ask Historic Environment Scotland what relevant powers and influence you have in your role with the Edinburgh World Heritage Site and also as custodian of Scotland's Historic Environment? Also what responsibility do you have to advise Scottish ministers in these circumstances?

What we think is essential is to secure from the City of Edinburgh Council a commitment to remove the World Heritage Site from the communal bins project and to continue with the existing waste collection arrangements (unless a better alternative can be found which does not damage the precious heritage of Edinburgh). Furthermore, a genuine attempt to look for better arrangements would require the City of Edinburgh Council to start from a position of no detriment to the historic environment.

We look forward to hearing from you.

Yours sincerely,

Tannis Dodd

Secretary, Stockbridge and Inverleith Community Council