

# Development Management Sub Committee

Wednesday 29 January 2014

**Application for Conservation Area Consent 13/03402/CON  
At CEC Depot, East Market Street, Edinburgh  
Demolition of building and boundary wall.**

Item number	6.6
Report number	
Wards	A11 - City Centre

## Links

<a href="#">Policies and guidance for this application</a>	LPC, CITCA1, CITE1, CITE2, CITE5, CITE6, CITE8, CITE9, NSG, NSGD02, OTH, CRPOLD,
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# Executive summary

## **Application for Conservation Area Consent 13/03402/CON At CEC Depot, East Market Street, Edinburgh Demolition of building and boundary wall.**

### Summary

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The proposed demolition accords with the development plan. The loss of the vehicle depot, which does not positively contribute to the character or appearance of the conservation area, is necessary for the related redevelopment proposals that will enhance this part of the conservation area. The associated benefits from the redevelopment of this site outweigh any townscape or heritage loss. There are no material considerations that outweigh this conclusion.

### Recommendations

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It is recommended that this application be approved subject to referral to Scottish Ministers and subject to the details below (in section 3 of the main report).

### Financial impact

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There are no financial implications to the Council.

### Equalities impact

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This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

### Sustainability impact

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This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

### Consultation and engagement

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#### **Pre-Application Process**

Pre-application discussions took place on this application.

#### **Publicity summary of representations and Community Council comments**

The application was advertised on 30 August 2013. Two letters of representation were received, including one from The Cockburn Association. The letters of representation raised the following material issues:

- old buildings are being sacrificed for a modern development;

- old buildings should be incorporated in to the development;

The Old Town Community Council has formally objected to the proposals. The community council has commented on the following issues:

- planning process;
- design, mix of uses and speculative nature;
- the demolitions do not comply with Local and National environmental, heritage and sustainability policy;
- contrary to Edinburgh City Local Plan.

A full assessment of the representations can be found in the main report in the Assessment section.

## **Background reading / external references**

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- [To view details of the application go to](#)
- [Planning and Building Standards online services](#)

## **Application for Conservation Area Consent 13/03402/CON At CEC Depot, East Market Street, Edinburgh Demolition of building and boundary wall.**

### **1. Background**

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#### **1.1 Site description**

The site comprises land at East Market Street which is currently occupied by the City of Edinburgh Council (CEC) vehicle depot building. The site is bound by high boundary walls and railings to Cranston Street. The vehicle depot building is constructed from stone with corrugated metal roof.

To the east of the site lies the Canongate Venture building which is a category C listed building. To the west are the Jeffrey Street arches which are also category C listed structures. Numbers 5a, 7 and 9 Cranston Street, are category B listed buildings. To the north of the site is East Market Street with Waverley Court, the main Council office building, directly opposite. To the south of the site lies the language school with hostel element.

The site lies within the Edinburgh World Heritage Site.  
This property is located within the Old Town Conservation Area.

#### **1.2 Site History**

October 2006 - Caltongate Masterplan was approved for the wider Caltongate Site.

10 July 2008 - conservation area consent granted for the demolition of building and boundary wall (as amended) (application number 07/01290/CON)

30 October 2008 - planning permission was granted for redevelopment and erection of buildings for residential flats, offices, alternative office and/or community facility and retail (class 1) use, access and servicing area. Realignment and alterations of Cranston Street (as amended) (application number 07/01288/FUL).

5 October 2012 - a Proposal of Application Notice was submitted under Section 42 application to vary condition 1 of planning permission 07/01288/FUL to extend time period for commencement of development (PA6). (application number 12/03629/PAN). This application was part of a number of applications for planning permission, listed building consent and conservation area consent to amend conditions.

22 May 2013 - a section 42 application to vary condition 1 of planning permission 07/01288/FUL was granted extending the planning permission for a further three years (application number 13/00092/CON).

23 August 2013 - This application forms part of a total of 7 parallel applications for planning permission, listed building consent and conservation area consent submitted for the wider site known as Caltongate. On this site, a planning application was submitted for the redevelopment/demolition/erection of buildings for mixed use

development comprising class 7 hotels, class 1, 2, 3 commercial, class 4 business, community uses (class 8 & 10), leisure (class 11), other associated uses, landscaping/public realm and other associated works at Land Adjacent To New Street 2, 4, 5 New Street, 221, 223, 227, 231 Canongate, Land At East Market Street, 5A-24A Cranston Street, 1-15 East Market Street, ( application number 13/03407/FUL).

## **2. Main report**

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### **2.1 Description Of The Proposal**

The development involves the demolition of the existing warehouse, boundary walls and railings.

There is a parallel application for the development of this site, which forms part of Caltongate South, application reference number 13/03407/FUL, which is accompanied by an Environmental Impact Assessment. The application proposes two six storey hotels and a two storey corner building accommodating cafe/restaurant use.

Revised plans were submitted on 26 November 2013.

The proposed changes do not materially change the nature or scale of the development. The proposals are supported by a supplementary design statement and include the following;

- revision to the finish to the Cranston Street corner pavilion building
- a proposal to gate the upper courtyard of the Cranston Street Hotel

The applicant has submitted the following documents in support of the application ;

- Planning Statement;
- Design and Access Statement; and
- Heritage Statement.

These are available to view via the Planning and Building Standards online services.

### **2.2 Determining Issues**

Do the proposals harm the character or appearance of the conservation area? If they do, there is a strong presumption against granting of consent.

### **2.3 Assessment**

To address these determining issues, the Committee needs to consider whether:

- a) the demolition will adversely affect the character and appearance of the conservation area and the World Heritage Site;
- b) the demolition does not impact upon biodiversity;
- c) the proposal has any equalities or human rights impacts and
- d) there are any material considerations raised in representations to be addressed.

## a) Character and Appearance of the Conservation Area

The character of the conservation area is summarised in the Old Town Conservation Area Character Appraisal as *"Centred on the Royal Mile, the city's main historic thoroughfare, the Old Town evolved from two separate burghs. Although few medieval buildings remain, the original plot widths and the 'fishbone' street pattern of narrow closes and wynds remain extensively visible, although overlain by major Victorian rebuilding and street improvements. The administrative, ceremonial, legal and religious functions of the modern city remain focused within the Old Town. The key elements of the area's character are therefore its density of building and mixture of uses with high tenements and important historic buildings arranged on a historic street pattern.*

*The Character Appraisal emphasises the more positive aspects of character in order that the future can build on what is best within the Conservation Area. The quality of urban and architectural design needs to be continuously improved if the character of the Conservation Area is to be enhanced. The retention of good quality buildings (as well as listed buildings) and the sensitive interpretation of traditional spatial structures in securing appropriate new development are of particular importance.*

Edinburgh City Local Plan Policy Env 5 requires that the demolition of an unlisted building within a conservation area which is considered to make a positive contribution to the character of the conservation area will only be permitted in exceptional circumstances as set out in Env 2.

The applicant has submitted a Heritage Statement including details of the historical developments on this site. It is acknowledged that the site is archaeologically sensitive and this is identified in the supporting information. A condition is required to secure a programme of archaeological investigation (excavation, reporting and analysis of historic building recording).

The existing structure was erected in the 1930s on the former site of a school. The existing structure is poorly articulated on its public elevations with expansive blank elements and does not contribute positively to the character or appearance of the Old Town Conservation Area or the Edinburgh World Heritage Site. The building is utilitarian in appearance and is of little architectural significance, historical interest or townscape value. The building is low and cut into the slope of the site and as a result is at odds with the prevailing building heights in the area. This lack of height results in a lack of containment to the adjoining streets and buildings and has disconnected this site from the tight urban grain which characterises the conservation area. The demolition of the existing structure and appropriate redevelopment of the site offers the opportunity to regenerate this part of the Old Town and is supported by the Caltongate Masterplan. The redevelopment of the site offers the potential to recreate a tighter Old Town grain and stitch this area back into the Canongate area and thereby enhancing the whole conservation area and world heritage site. The associated benefits from the redevelopment of this site outweigh any townscape or heritage loss.

Application reference 13/03407/FUL is considered in a separate report for the development of the site for two hotels and a two storey corner cafe/restaurant building, as part of comprehensive proposals for Caltongate southern edge. The impact of the redevelopment proposals on the character and appearance of the conservation area is considered within the assessment of that report. To date the proposed redevelopment

remains speculative and therefore a condition is recommended preventing demolition until a contract for new works is let.

In summary, the demolition and redevelopment will not result in the loss of any features which contribute to the character of the conservation area. The development will enhance the character and appearance of the conservation area and the World Heritage Site and is in accordance with the development plan. The signed section 75 Legal Agreement makes provision for the reuse of the stone in Calton Road.

#### b) Biodiversity

A previous walkover bat survey was carried out in January 2013 as background to the application to renew planning consent. The surveys identified a low likelihood of bat roosting. A further detailed survey was carried out as part of the Environmental Statement on dates in May and August at dawn and dusk. No bats were recorded roosting in the study area. No bats were observed feeding and very low numbers were observed commuting through the site. It is concluded therefore that the demolition of the building would not impact upon bats and no mitigation is required.

#### c) Equalities & Human Rights

The demolition of the buildings is controlled through separate legislation and their loss will not impact upon Equalities and Human Rights. An Equalities and Rights Impact Assessment has been completed.

#### d) Representations

##### **Material Representations**

- old buildings are being sacrificed for a modern development - this is addressed in section 2.3 a) of the assessment
- old buildings should be incorporated into the development - this is addressed in section 2.3 a) of the assessment

##### **Community Council comments**

The Community Council raised a number of issues in their consultation response which relates to the parallel planning applications, listed building applications and applications for conservation area consent, which have been addressed in the related reports. Of relevance to this application for conservation area consent to demolish the building the following points are of relevance;

- the demolitions do not comply with local and national environmental, heritage and sustainability policy. This is addressed in section 2.3a) of the assessment.
- contrary to Edinburgh City Local Plan. This is addressed in section 2.3a) of the assessment.

## **Conclusion**

In conclusion, the proposed demolition accords with the development plan. The loss of the vehicle depot, which does not positively contribute to the character or appearance of the conservation area, is necessary for the related redevelopment proposals that will enhance this area of the conservation area. The associated benefits from the redevelopment of this site outweigh any townscape or heritage loss. There are no material considerations that outweigh this conclusion.

## **3. Recommendations**

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**3.1** It is recommended that this application be approved subject to referral to Scottish Ministers and to the details below

### **3.2 Conditions/reasons**

1. The application shall be referred to the Scottish Ministers prior to determination.
2. No demolition shall take place on the site until the applicant has secured and implemented a programme of archaeological work (excavation, historic building recording, reporting and analysis and publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.

3. No demolition shall take place until the contract for the new development has been let, and written evidence of this has been made available to and accepted in writing by the Head of Planning and Building Standards.

### **Reasons:-**

1. In order to accord with the statutory requirements of the Town and Country Planning (Scotland) Acts.
2. In order to safeguard the interests of archaeological heritage.
3. In order to safeguard the character of the conservation area.

### **Informatives**

It should be noted that:

1. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.

2. The masonry material arising from the demolition of the building shall be utilised for the building of a new wall on the north side of Calton Road as agreed in the section 75 Legal Agreement.

**Statutory Development  
Plan Provision**

Edinburgh City Local Plan (ECLP)

The application site is identified within the ECLP as being within the central area. The site also forms part of Proposal CA 2 - Caltongate.

Caltongate Masterplan

The Planning Committee on 5 October 2006 approved the Caltongate Masterplan as supplementary planning guidance, subject to amendments requiring improvements to the area around Calton Road Railway Bridge and the principle of including green space.

The Masterplan addresses a series of sites within the Old Town which extend over 3.46 hectares. The Masterplan comprises two sites on Calton Road; the former New Street bus depot (now demolished); Sailor's Ark, properties on 221 – 229 Canongate; and properties on East Market Street (Canongate Venture, former Council garage, two parking lots and the Jeffrey Street Arches).

The Masterplan structure comprises; Site and Context, Vision, Development Objectives, Site Specific Development Principles, Transport and Parking, Infrastructure, Development Contributions, Implementation and Phasing and Appendices.

In addition the document contains guidance on Site Specific Development Principles, Transport and Parking, Infrastructure, Developer Contributions and Implementation and Phasing.

**Date registered**

23 August 2013

**Drawing numbers/Scheme**

1,2a, 3-10, 11a-18a,19,20,21a,22,



**David R. Leslie**

Acting Head of Planning and Building Standards

## Links - Policies

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### **Relevant Policies:**

#### **Relevant policies of the Edinburgh City Local Plan.**

Policy Ca 1 (Central Area) sets criteria for assessing development in the Central Area.

Policy Env 1 (World Heritage Site) protects the quality of the World Heritage Site and its settings.

Policy Env 2 (Listed Buildings - Demolition) identifies the circumstances in which the demolition of listed buildings will be permitted.

Policy Env 5 (Conservation Areas – Demolition of Buildings) sets out criteria for assessing proposals involving demolition of buildings in conservation areas.

Policy Env 6 (Conservation Areas Development ) sets out criteria for assessing development in conservation areas.

Policy Env 8 (Protection of Important Remains) establishes a presumption against development that would adversely affect the site or setting of a Scheduled Ancient Monument or archaeological remains of national importance.

Policy Env 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

#### **Relevant Non-Statutory Guidelines**

**Non-Statutory guidelines** Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings and landscape, in Edinburgh.

#### **Other Relevant policy guidance**

**The Old Town Conservation Area Character Appraisal** emphasises the survival of the original medieval street pattern; the wealth of important landmark buildings; the survival of an outstanding collection of archaeological remains, medieval buildings, and 17th-century town houses; the consistent and harmonious height and mass of buildings; the importance of stone as a construction material for both buildings and the public realm; the vitality and variety of different uses; and the continuing presence of a residential community

# Appendix 1

## Consultations

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### Historic Scotland

*No comment*

### Archaeology

*Further to your consultation request I would like to make the following comments and recommendations in respect to this application for the demolition of depot and boundary wall.*

*I refer you to my earlier comments in response to the associated application for the main development of the site 13/03407/FUL which outlines the archaeological significance of the site and archaeological mitigation. As such application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh City Local Plan Policies ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.*

*In terms of the required archaeological mitigation this has yet to be undertaken and requires as part of the overall archaeological mitigation strategy the undertaking of a Historic building recording of the upstanding buildings on this site prior to demolition. Also given the archaeological sensitivity of the site as outlined in my earlier response to 13/03407/FUL) there will potentially be constraints on the demolition methodology requiring the undertaking of archaeological work in advance.*

*Accordingly is it is essential that the following condition is attached to this consent to ensure that completion of the programme of archaeological works on this site.*

*'No demolition shall take place on the site until the applicant has secured and implemented a programme of archaeological work (excavation, historic building recording, reporting and analysis and publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'*

*The work must be carried out by a professional archaeological organisation, either working to a brief prepared by CECAS or through a written scheme of investigation submitted to and agreed by CECAS for the site. Responsibility for the execution and resourcing of the programme of archaeological works and for the archiving and appropriate level of publication of the results lies with the applicant.*

### Old Town Community Council

*The Old Town Community Council wish to strongly OBJECT to the following applications*

*Ref. 13/03407/FUL and all the associated Listed Building and Conservation Area applications for the redevelopment of 'The Southern Site' and, Ref. 13/03406/FUL for the development of offices and mixed use buildings on the Gap site*

*We wish to raise objection to both the proposals submitted and the processing of applications.*

*With regard to the Process.*

- The consultation period for these major applications has failed to follow the advice and commitments laid out in the new Planning Concordant. The plans were submitted with little support offered to community or public to access these enormous documents or provide summarised interpretation of the proposed buildings and their uses.*
- There is no processing agreement in place (previous timetables presented during pre- application events have all been subject to slippage).*
- No development viability statement has been provided and the economic benefits presented are speculative in the extreme and are not supported by independent analysis.*
- The information submitted does not include sufficient detailed assessments of the traffic and environmental impacts of this development. The traffic statement provides little detail of traffic generation and makes no reference to agreed and planned changes to traffic services and emerging patterns (eg. Royal Mile pedestrianisation and traffic calming measures).*
- The proposed buildings are described as having a mix of uses but uses are not defined in their layout either geographically or by breakdown of floorspace.*
- The applications should not have been validated until all the necessary information needed to assess the development had been submitted.*
- The plans are Major and comprise multiple buildings making it very difficult for the public to access and comment. The lack of publicity and difficulty many have experienced accessing the Council's on-line planning portal have created further barriers for the public to comment on these plans.*
- It should be noted that the plans generated some 250 comments to just one posting on social media after details were published in the press (the article describing the proposals having  
  
been published only one day AFTER the public consultation closed).*
- The planning process has failed to allow fair opportunity for the public to comment. Many have expressed their objections to this proposal but have had no opportunity to comment through lack of information and access. The planning portal has limited access as public need to log on and limit comments to 2000 characters with the portal 'timing out' repeatedly. In light of these issues, the confusion caused and the limited time afforded for public comment for such a major development comments submitted through social media platforms have been listed at the end of this letter.*

*With regard to the plans submitted we object to the design, mix of uses and speculative nature of the proposals which, although scaled back slightly from the previous scheme, still fail to meet the economic, social and environmental needs of the area and the City.*

*The proposed demolitions and partial demolitions do not comply with current Local and National environmental, heritage and sustainability policies, including Edinburgh Local Plan Environment Policies Env 1, Env 2, Env 3, Env 4, Env 5, Env 6, and Env 12.*

*The proposals do not comply with Edinburgh Local Plan Design Policies Des1, Des 3 and Des 6. The development lies within an Outstanding Conservation Area and should reflect and protect the characteristics, authenticity and quality of design of the area. The proposals are bland 'anywhere' architecture not appropriate in the Old Town.*

*In particular*

*The Mix of Uses*

- *There is an over provision of accommodation for transient residents in the area which has led to a worrying decline in the %age of permanent residents. More housing is needed in the city centre and in this locality in particular. The need to adapt the Local Plan and local supplementary planning guidance (eg. Masterplans and development briefs) has been the subject of responses to the Local Plan and other local Action Plans.*
- *The number of hotels is excessive for the site. The previous consent permitted a 210 bed hotel. The proposals now include an additional two more hotels taking the proposed bed space to 403. The previous scheme included some affordable housing on East Market St and within the McRae tenements on the Canongate, these have now been deleted from the plans.*
- *Recent Business Bulletin on Hotel provision stated provision was now at 188% of that required. The developments at Cowgate and Advocates Close have seen hotel development expand, at Advocates Close this was accomplished through the deletion of over 80 new flats.*
- *There is a potentially excessive level of bad neighbour developments planned (hot food takeaways, bars, nightclubs, restaurants etc). It is not possible to assess the cumulative impact of these uses on neighbouring residential streets and properties as the plans do not detail the size or location of each use.*
- *Retail uses are included as one of a number of uses for each block.*
- *The range of uses 'planned' for each unit covers Classes 1(retail),2 (professional services/office), 3( food and drink), 4 (office), 7(hotels and hostels), 8 (residential institutions), 10 (non residential institutions) and 11 (assembly and leisure) as well as other unclassified uses. As these uses have differing servicing and transport requirements it is impossible to ensure an appropriate mix is delivered for each part of the site or control the impact of such uses.*

*The Design of the buildings*

- *The overall design is bland and oversized. There is a monotony about the design which could be better handled by using a wider range of architectural styles and finer grain to the blocks of new build. The existing listed and unlisted buildings are capable of being restored and reused without the large scale demolitions proposed on the Royal Mile and the unnecessary demolitions and additions of glass extensions to the Listed Buildings on East Market Street.*
- *The two hotel blocks proposed on East Market St are too high and over dominant, they impact negatively on the Listed Canongate Venture and its setting as well as on key views through the Waverley Valley obscuring the spine of the Royal Mile, Canongate Venture and other Listed Buildings and landmarks. The Blocks will overshadow neighbouring properties and the Canongate Venture.*
- *The excessive pend to be created on the Canongate is completely unnecessary for a pedestrian only route and will have a hugely negative impact on the appearance of the Royal Mile.*
- *The design of each block is architecturally more in keeping with the form and scale of the New Town.*
- *The finishings and building materials are not sympathetic to the Old Town and will create further damage to the integrity of the World Heritage Site.*
- *The inappropriateness of the design has been described most accurately in letters of objection from both the Cockburn Association and AHSS.*

#### *The public realm*

- *The proposal claims to improve public realm but the planned public square and Parliament Way will be privately owned and managed. The management team will have control over access, traffic and servicing of buildings around the square negotiated by private arrangement/fees and it is unclear which other roads (eg. Residential Street) will also be 'managed' by a private company or be adopted by the Roads Authority.*
- *We still believe the public square is one of the key failures of the proposals as the layout will create an unpleasant windy uniform space which is mostly in shadow, the purpose as an alternative pedestrian route remains questionable particularly as the Royal Mile Action plan is now focussed on improving the pedestrian route along the Royal Mile. Whilst the inclusion of new routes and connections through the area is to be encouraged the creation of public realm in this location should support the traditional pattern of small courtyards linked through closes and wynds connecting streets and spaces at different levels.*
- *There is a need for human scale, well designed green public spaces but the proposed public realm works fail to achieve this and the plans not only fail to improve the pedestrian environment on North New St but the traffic and servicing planned and office uses proposed will result in a further deterioration of the environment and safety around the New St Calton Road junction.*
- *The public square and repaving of streets offers little improvement to existing traffic routes and do little to support the planned pedestrianisation and other works proposed in the Royal Mile Action Plan.*

- *The proposals also describe the internal ground floor space of Canongate Venture as public realm whilst the proposed redevelopment of the playground will significantly reduce existing public realm.*
- *The development of the land in front of the Arches (west Cranston St) will also reduce public realm. This area was identified by many stakeholders throughout the pre-application consultation as a sheltered sunny space which is more suited for creating a successful landscaped area of public space.*

*In conclusion we respectfully request that further amendments and consultation is carried out to ensure the finalised plans fulfil the needs and aspirations of the community for a truly sustainable example of mixed use city centre development that meets the urgent needs of the local community and supports the City's wider aims.*

*This is a World Heritage Site and the development should provide an exemplar of resilient redevelopment which accords with the most recent guidance and policies on placemaking, heritage, conservation and sustainability.*

*This ill fated protracted speculative development has worn down the local community and through the process of attrition there are those within the community who have given up while others are of the opinion that anything would be better than the blighted gap site. However, in spite of the delay in development it is only proper for such a development that thorough public consultation is carried out.*

*The Council have shown much favour to private development interests throughout the process, neglecting their primary duty to serve the public, that the credibility of both the Council and this master plan is fundamentally in question.*

*Given the outstanding World Heritage location, the controversial sale of public listed assets through confidential closed transactions is a glaring example of Council failure when these sales cannot show themselves to represent Best Value for what is a magnificent opportunity for sensitive, world class redevelopment.*

*Consideration should be given to the comments received through social media in response to the Scotsman article published after the consultation closed (see appendix 1 below)*

*The OTCC request further full consultation on any amendments and the additional information required (eg. Transport assessment, break down and distribution of uses, and development viability statements).*

### **Scottish Natural Heritage**

*Thank you for your consultation of 3 September 2013 regarding the above proposal.*

*The proposal is for the re-development of the land adjacent to New Street in Edinburgh. We note the limited likely impacts on natural heritage interests and therefore we have made some minor comments relating to protected species, aspects of landscape and visual impacts where relevant, and green infrastructure.*

### *Bat surveys*

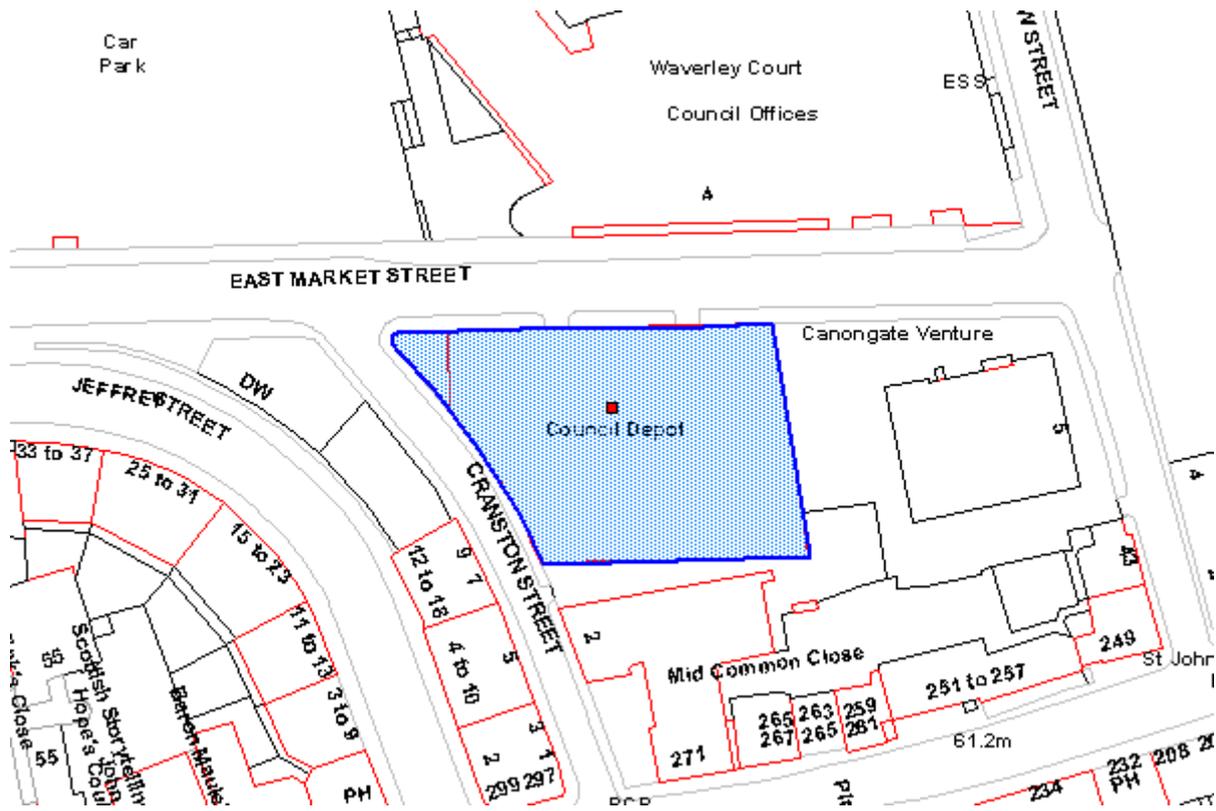
*It's noted that Ecology was scoped out of the EIA after a bat survey had been undertaken to determine usage of the area. The comprehensive bat survey did not identify any roosts and determined that the site had limited potential to support bats. Based on these results, a licence would not be required for this development to proceed.*

### *Landscape and visual; Green infrastructure*

*There will be some degree of change to local views, including those views towards key features of the city's natural heritage. For example, the viewpoint analysis portrays the impact of built development and the changes in the composition of readily available views from city streets and public spaces towards Salisbury Crags, Arthur's Seat, Calton Hill, the Waverley Valley and the coast. In terms of ameliorating the likely landscape and visual impacts of the proposals and visually "breaking up" the otherwise medium to large scale, often linear masses created by the main buildings and their rooftops, the proposed roof gardens are likely to have some degree of beneficial effect. We would suggest that the positive appearance of the green roofs within the composition of existing views are portrayed in the submitted photomontages, particularly those derived from the elevated viewpoints such as from Regent Road and Calton Hill (viewpoints 17 and 18 ).*

*We support this form of green infrastructure and it is a sensible aspect of this site's design and overall environmental mitigation. We advise that further details of the form and design of planting of the roof should be sought, and this will need to be carefully managed in relation to overall character of the area and with regards to the potential appearance of the planting. There may be further benefits to be gained in extending the use of green roofs elsewhere in the development. For example, further use of green roofs could reduce the mass and linearity of some of the larger buildings proposed elsewhere in both the northern and southern development sites (and as portrayed in the Calton Hill/ Regent Road photomontages) while also enhancing the green infrastructure contribution of the combined development site.*

# Location Plan



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