

# Development Management Sub Committee

Thursday, 17 December 2015

**Application for Planning Permission 15/03989/FUL  
At New Parliament House, 5 - 7 Regent Road, Edinburgh  
Change of use, alterations to and restoration of principal former Royal High School building and pavilions (original Thomas Hamilton-designed school buildings), demolition of ancillary buildings including the former Gymnasium Block and Lodge, new build development, new/improved vehicular, service and pedestrian accesses, landscaping, parking, public realm and other works to create a world class hotel of international standing with associated uses (including publicly accessible bars (public house) and restaurants (Class 3)).**

<b>Item number</b>	3.1(a)
<b>Report number</b>	
<b>Wards</b>	A11 - City Centre

## Summary

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The proposed change of use, alterations and extension of the Royal High School to create a luxury hotel would assist in addressing the demand for high quality hotels in Edinburgh. While planning can have no control over the type of hotel use, it is clear that a hotel of the very highest quality is proposed. There would be significant benefits to the city's economy and tourism resulting from this type of hotel. The existing building is not being used at present and is on the Buildings at Risk Register. The proposal would bring the former Royal High School back into sustainable long term use.

In relation to a number of aspects, such as neighbouring amenity, transport, archaeology, geology, culture, environmental health and infrastructure, the development is acceptable or its impacts can be successfully mitigated with the use of planning conditions or legal agreements.

The site contains a number of buildings that fall under a category A listing, the most important of which is the original building known as the Hamilton Building. The site sits within a dynamic urban landscape. It is highly sensitive, being highly prominent in the Edinburgh World Heritage Site, New Town Conservation area and the New Town Gardens Inventory Gardens and Designed Landscape. It is adjacent to the Site of Special Scientific Interest on Calton Hill. The Hill contains a series of monuments and buildings that are also category A listed. The impacts of the extensions and alterations to the building therefore need careful consideration in order to determine whether any harm these may cause would outweigh the benefit of bringing building into use.

The architectural appearance, of the proposed new buildings echoes the form of the nearby Crags. They are clearly modern additions, providing a striking contrast to the Hamilton Building and the nearby listed monuments and buildings. The materials and detailing would ensure a high quality elevation design. In relation to these aspects, the architecture proposed is a sophisticated response to the site's sensitive context. While the architectural design, through the elevational design and the stepped form, does mitigate, to some degree, the effects of the size of the extensions, the proposal would have a significant adverse impact on the character and setting of listed buildings, the character of the Conservation Area and the OUV of the World Heritage Site. The proposed does not meet the requirements of Policy Des 3 a) of the ECLP or Policy Des 4 of the LDP.

The intrusion into the landscape space that can be seen below and alongside the listed monuments and buildings on Calton Hill would erode their setting. The proposal does not comply with Policies Env 3 and Env 4 of the Edinburgh City Local Plan (ECLP), Policies Env 3 and 4 of the Second Proposed Edinburgh Local Development Plan (LDP) or the Scottish Historic Environment Policy (SHEP).

In respect of SHEP it is necessary to consider whether the proposed development is acceptable in order to determine whether demolition can be supported in this instance. Due to the adverse impacts of the proposed development, the demolition of two listed buildings within the site (the gymnasium building and the lodge) cannot be justified. The proposal does not comply with Policy Env 2 of the ECLP, Policy Env 2 of the LDP or SHEP.

In addition, the proposal's effects are detrimental to the character of the New Town Conservation Area and to the Outstanding Universal Value (OUV) of the Edinburgh World Heritage Site. The proposal does therefore not comply with Policies Env 1 and Env 5 of the ECLP and Env 1 and Env 6 of the LDP.

While in general the development would accord with principles on accessibility and would have an economic benefit, these benefits are not outweighed by the harm to the historic environment. As such, the development is not sustainable development as defined by Scottish Planning Policy.

The development does not comply with the Princes Street Block 10 Development Brief, due to the impact on the setting of the Royal High School.

The benefits to the City's economy and to tourism through bringing an at risk building back into a sustainable long term use are not outweighed by the very significant harm to built heritage and landscape of the city. In coming to this conclusion, regard has been had to the exceptional architectural and historic interest of the Royal High School and the quality of its surrounding environment. The development would cause permanent and irreversible damage. The adverse impacts on the character and setting of listed buildings, the New Town Conservation Area, the designed landscape of Calton Hill and the OUV of the World Heritage site would not be mitigated by the sophisticated design of the proposed extensions. Put simply, too much building is being proposed for this highly sensitive site.

## Links

[Policies and guidance for this application](#)

LPC, NSGSTR, PLDP01, PLDP02, PLDP03, PLDP06, PLDP07, PLDP08, PLDP09, PLDP10, PLDP11, PLDP12, PLDP13, PLDP16, PLDP17, PLDP19, PLDP20, PLDP21, PLDP22, PLDP23, PLDP24, PLDP25, PLDP26, PLDP27, PLDP29, PLDP30, PLDP32, PLDP33, PLDP34, PLDP38, PLDP39, PLDP40, PLDP50, PLDP66, PLDP70, PLDP71, PLDP72, PLDP74, NSG, NSGD02, NSBUS, NSESBB, NSBUS, NSDCAH, NSLBCA, NSP, CITCA1, CITD1, CITD3, CITD5, CITD6, CITD7, CITD10, CITD11, CITEM5, CITE1, CITE2, CITE3, CITE5, CITE6, CITE7, CITE8, CITE9, CITE11, CITE12, CITE14, CITE15, CITE16, CITE17, CITE18, CITOS3, CITR6, CITR12, CITT1, CITT3, CITT5, CITT6, CITT2, LDPP,

# Report

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At New Parliament House, 5 - 7 Regent Road, Edinburgh  
Change of use, alterations to and restoration of principal  
former Royal High School building and pavilions (original  
Thomas Hamilton-designed school buildings), demolition of  
ancillary buildings including the former Gymnasium Block  
and Lodge, new build development, new/improved vehicular,  
service and pedestrian accesses, landscaping, parking,  
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international standing with associated uses (including  
publicly accessible bars (public house) and restaurants  
(Class 3)).**

## Recommendations

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1.1 It is recommended that this application be Refused for the reasons below.

## Background

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### 2.1 Site description

The application site is the former Royal High School with its grounds and ancillary buildings, including a strip of public open space and part of the public walkway on the southern edge of Calton Hill. The site is located at a prominent, elevated position on the north side of Regent Road on Calton Hill. It is 1.84 hectares in area.

The former school and the buildings are category 'A' listed (LB Ref LB27987, 19 April 1966). The principal building was designed in the Greek revival style by Thomas Hamilton in 1825 - 1829. It is widely regarded as an exemplar of this type of architecture. It is composed of a powerful symmetrical grouping of the principal Doric temple-pavilion, with flanking colonnades and subsidiary temples. This is known as the Hamilton building.

The listed building group also includes a gate lodge on the north west side of the site (built in 1885) and a classical style, classroom block (built in 1894) to the north east of the main building. The northern boundary of the former school grounds is bounded by a deep retaining wall which is also part of this listing. This wall runs alongside the public walkway on Calton Hill, part of which is included within the site area. At the eastern end of this wall is a tower which is currently hidden from view by vegetation and the classroom block. There are also other buildings within the site that are listed because they were built before 1948 and are within the curtilage of a listed building. These include a block on the northern boundary to the north west of Hamilton's building and a block to the south of the 1894 classroom block.

An area of informal landscaping, including small trees and shrubs, is located at the western end of the site next to the entrance to the old school and the walkway to Calton Hill. There is former playground space to the rear of the building and between the buildings at the eastern end. To the front, there are terraces and lawns which slope down towards the boundary wall on Regent Road.

The public park on Calton Hill, lies to the north of the site. The park is a Site of Special Scientific Interest and is included in the Historic Scotland Inventory of Gardens Designed Landscapes. It is identified as a Candidate Special Landscape Area, in the Second Proposed Edinburgh Local Development Plan. It contains a collection of category A listed buildings, including:

- National Monument (LB Ref LB27820, 19 April 1966);
- Nelson's Monument (LB ref 27823, 19 April 1966);
- Dugald Stewart Monument (LB ref 27835, 19 April 1966);
- Playfair's Monument (LB ref 27826, 19 April 1966); and
- The City Observatory (LB ref 27603, 19 April 1966).

The Robert Burns monument, designed by Hamilton is category A listed (LB ref 27801, 19 April 1966) and is located on the opposite side of Regent Road to the east of the Royal High School. The category A listed 1 Regent Terrace (LB ref 29618, 16 December 1965) is situated immediately to the east of the site. With the other buildings in Regent Terrace, it is part of the 'Calton A' group of listed buildings. The category A listed, St Andrews House (LB ref 27756, 14 December 1970) is located to the south east, on the opposite side of Regent Road. There is a category B listed 'K6' telephone box (LB ref 49151, 19 March 2003) on the northern footway of Regent Road, just to the west of the site.

The site is within 800m of Holyrood Park, which is a royal park and a scheduled monument, (SM13032, 7 February 2013). It is also within 800m of the Palace of Holyroodhouse which is a royal palace and category A listed building (LB Ref 28022, 14 December 1970). The associated Holyrood Abbey, precinct and remains is a scheduled monument (SM ref 13031, 7 February 2013).

The site is located in the Old and New Towns of Edinburgh World Heritage Site.

This application site is located within the New Town Conservation Area.

## **2.2 Site History**

17 November 1971 - Planning permission granted for change of use to an arts and cultural centre for the city (planning application number 1389).

22 September 1976 - planning permission granted for alterations to existing buildings to form accommodation for the Scottish Assembly (planning application number GD68/76).

7 March 2000 - Planning permission granted for alterations to form temporary district courts including the erection of a portacabin (planning application number 99/3131/CEC).

7 March 2000 - Listed Building Consent approved for alterations to form temporary district courts including the erection of a portacabin (listed building consent application number 99/3131/CEL).

25 July 2002 & 19 March 2004 - Planning permission granted for the erection of a temporary portacabin (planning application numbers 02/00072/CEC & 04/00135/FUL).

21 January 2015 - A proposal of application notice (PAN) was submitted for planning permission for the change of use, alterations to and restoration of principal former High School building and pavilions, demolition of ancillary buildings, including former gymnasium and gatehouse, new build development, new /improved pedestrian and vehicle access, landscaping, parking and public realm works to create a world class hotel of international standing. The PAN was approved on 3 February 2015. It was reported to the Development Management Sub Committee on 25 February 2015 (PAN number 15/00223/PAN).

21 May 2015 - A proposal of application notice was submitted for the conservation and adaption of former Royal High School building, to form new premises for St Mary's Music School and adaption and demolition of later ancillary buildings essential to form new residential and practice facilities for the school. It was approved on 5 June 2015. It was reported to Development Management Sub Committee on 24 June 2015 (PAN number 15/02381/PAN).

3 September 2015 - Application for listed building consent received for refurbishment (external and internal), alteration and extension of principal former Royal High School building and pavilions, demolition of former Lodge, Gymnasium Block, demolition of 2 curtilage buildings (former Classroom Block and Luncheon Hall), demolition of existing gates, wall (in part) and formation of new service access. This application is currently under consideration and is also the subject of a report to the Development Management Sub Committee (Application number 15/03990/LBC).

### Other Relevant Site History

1968 - The building was vacated when Edinburgh Royal High School was relocated to its current Barnton site.

1 June 2009 - The Council launched a business competition to attract expressions of interest from experienced leisure and entertainment providers to develop proposals for the use, design, funding and commercial potential for the redevelopment of the Old Royal High School. Proposals had to demonstrate that there was no public funding requirements for capital development or ongoing day-to-day operations.

2 February 2010, the selection panel confirmed Duddingston House Properties LLP as the City's preferred partner to 'deliver a sustainable development and business solution for the former Royal High School'. Duddingston's proposal centred on providing a luxury hotel of international standing that will provide exceptional culture, arts and performance programmes and work closely with stakeholders to improve the local amenities of Calton Hill and the surrounding area.

# Main report

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## 3.1 Description Of The Proposal

The proposal is for a change of use to a 147 bedroom hotel, the demolition of a number of existing buildings on site and alterations and extension to the Hamilton Building.

### *Demolition*

Demolition of existing buildings on the site includes:

- The lodge building at the western entrance into the site;
- Classroom block to the north west of the Hamilton Building;
- The gymnasium block to the north east of the Hamilton Building;
- The luncheon hall to the east of the Hamilton Building;
- Existing boundary wall and railings to the west of the site; and
- Removal of walls and curved steps on either side of the Hamilton Building.

### *Western Wing*

The proposed western extension to the Hamilton Building is six storeys high. It is made of a series of floor plans that get progressively smaller for each level upwards. These floor plans step back from the Hamilton Building which creates a terraced effect. Some of the floors overhang others in places. This is most prominent at the western end onto Regent Road, where the first floor extends beyond the ground floor's external wall. The rear of the extension faces north. At its front, one part of the extension faces approximately south west and the other south east. This gives it a roughly triangular shape when viewed from above, but with rounded corners.

The western extension links to the Hamilton Building at the Hamilton Building's west elevation. There is a lower ground floor link at the southern end of that elevation and a lower ground floor and ground floor link at the northern end. Separating these links, a small courtyard is formed. At lower ground floor level, the extension links to the western pavilion. The link is largely glazed and has a roof terrace at ground floor level.

It measures approximately 78.5m by 36.4m in plan at upper ground floor level (including the link). At this level it is approximately 1749sqm in area measured to the outer surface of the external wall. It is therefore bigger in plan at this level than the Hamilton Building which is approximately 82.3m by 24.6m and has an area of 1514sqm.

At 95.45m high above ordnance datum (AOD) (the height above sea level), this extension is higher than the Hamilton Building. At the western end, the extension is approximately 23.9m high from street level. The highest point of the Hamilton Building is 86.72m AOD. Because of the change in levels, at the front the existing Hamilton Building measures 18.8m from street level to ridge and at the back it measures approximately 11m.

The western wing's elevations are made of curtain walling and pre-patinated copper cladding. The glazing will have an opaque finish to floor edges and ceiling zones. The cladding will be arranged in vertically proportioned sections which are rectangles when seen straight on but three dimensionally formed to give a faceted appearance. There will be natural stone cladding to the lower ground floor level.

### *Eastern Wing*

The proposed eastern extension is similar to the western extension. However, it takes a different form and is five storeys high plus basement. Its rear facade is aligned to face north west, with its facade to Regent Terrace facing south east and aligning with that street. It steps up in height progressively the further away it extends from the Hamilton Building at its eastern end. At its eastern end, the extension steps away from the eastern boundary of the site. It links to the Hamilton Building in a similar way as the western extension, with a one storey link to the front and two storey link at the rear.

This extension is 88.5m AOD at its highest point. It measures approximately 74.7m by 24.4m at its widest points and is approximately 1465sqm in area at upper ground floor level. This floor level is the part of the principal level of accommodation that the main entrance to the hotel is on.

At the basement level, service access is provided from Regent Terrace via a widened opening in the exterior wall next to the East Pavilion. The proposed replacement doors to this vehicular opening are faced with pre-patinated copper cladding, to match that used on the east and west wings.

### *Rear of Hamilton Building*

Two extensions are proposed to the rear of the Hamilton Building. These sit in the recesses, at either side of the existing debating chamber and are known as the 'link galleries'. These links allow people to circulate along the building without having to pass through a series of individual rooms on the way. They are glazed.

### *Alterations*

The alterations to the Hamilton Building include:

- Existing windows in the rear of debating chamber altered to form new main entrance doorways;
- Removal of the tiered seating area in the debating chamber;
- Formation of new basement rear corridor to the rear of the Hamilton Building - this involves excavation;
- Reinstatement of opening between the debating chamber and the front colonnaded portico;
- Removal of stairs and other non-original features; and
- New external steps which will be constructed along the north boundary of the site connecting it to the path up leading to Calton Hill.

### *How the building will be used*

The Hamilton Building will be used as the main entrance to the Hotel. There will be reception spaces as well as lounge, fine dining and bars. At its lower ground level there will be kitchens, meeting rooms and a whisky bar.

The lower ground level of the western extension will have a ballroom, foyer, lobby and café as well as ancillary facilities like WCs.

At the lower ground level of the eastern extension there will be a swimming pool, a fitness suite, changing rooms and spa treatment rooms.

The upper levels of the western and eastern extensions will be bedrooms.

An arts and culture strategy is proposed. The intention is for the hotel to actively work with Scottish arts and other cultural organisations to deliver an arts and culture programme. This aspect of the use is ancillary to the use of the building as a hotel. Details of it can be found in the Arts and Culture Strategy Statement.

### *Plant*

Most of the building services are proposed in the basement plant room with several additional plant spaces along the lower ground floor. There is also an external chillers compound proposed at the east end of the building and potentially kitchen supply/extract plant on the roof of the existing school, on either side of the central roof dome.

### *Landscape*

The proposals include the removal of 26 out of the 29 viable trees on site, half of which have been identified in the submitted tree constraints plan, as 'worthy of retention'. The three trees identified for retention are currently in 'good or fair condition'. The proposed landscape scheme includes the planting of three replacement trees at the western end of the site. The proposals also necessitate the cutting back of the overhanging canopy of seven trees, located on land to the south of the site at its eastern end, to facilitate the construction of the proposed building. The extent of the cut-back to the canopies required varies from between 6% and 40%, but is mainly between 13-25%.

The proposals for soft landscaping include the provision of a series of green roof gardens on the new buildings. These are to be planted with a variety of low growing plants suitable for this location, including sedums and wildflowers. Ferns are used on the north side of the building.

In the light wells, between the new buildings and original buildings, ferns and shade tolerant plants are proposed.

A low maintenance lawn is proposed on the roof terrace at either side of the main building, edged with a yew hedge. At ground level, in front of the Royal High School, a formal arrangement of clipped hedge of various species is proposed. On the west side, at street level, a long bed of ferns and ivy with three pine trees is proposed. The existing woodland area to the rear of the site is to be planted with ivy.

### *Public Realm*

The proposed works to the public realm around the building includes:

- Widening of the public footway on the frontage of the Hamilton Building and its resurfacing with sandstone slabs;
- Widening of the section of public footway, to the west of the pedestrian and vehicular access from Regent Road and resurfacing with sandstone slabs;
- Replacement of existing setts and tarmac at the entrance to the site from Regent Road with new granite setts;
- Re-surfacing with new granite setts of the courtyard to the rear of the Hamilton Building;
- The laying of sandstone setts on the proposed pedestrian and cycle circulation area to the rear of the proposed western wing;
- Formation of one bus lay-by and one taxi lay-by on the site frontage on Regent Road, each to be surfaced with granite setts;

- Formation of a service entrance, at the western end of Regent Terrace. The existing bollards at this end of Regent Terrace will be retained in situ. The proposed service entrance is to be re-surfaced, using a combination of new and reclaimed granite setts;
- Removal of central reservation barriers along Regent Road and resurfacing of central reservation with reclaimed granite setts;
- Formation of three pedestrian crossing points on Regent Road, one of which is located close to the main entrance to the hotel on this frontage;
- Removal of the on street, 'pay and display' parking along the southern carriageway of Regent Road; and
- Relocation of the existing bus stop on the Regent Road site frontage, to a position east of the junction with Regent Terrace.

### Supporting Statement

The following supporting documents have been submitted with this application and are available to view on the Planning and Building Standards Online Services:

- Planning Statement;
- Developer Statement;
- Pre application Consultation Report;
- Phase 3 Public Consultation Statement;
- Phase 4 Public Consultation Statement;
- Design and Access Statement;
- Heritage Statement;
- Transport Assessment;
- Sustainability Statement;
- Arts and Culture Strategy and Addendum;
- Specifications for use of pre-patinated copper cladding;
- Statement from ARUP engineers on rock extraction methodology;
- Letter from proposed hotel operator (explaining hotel ethos);
- Further supporting letter from hotel operator;
- Statement on response from Scottish Natural Heritage;
- Statement on response from Archaeology; and
- Statement on response from Historic Environment Scotland.
- Economic Information:  
The following economic information has been submitted:
  - Economic Impact Assessment;
  - Assessment of Economic Viability of Alternative Uses;
  - Hotel Viability Analysis;
  - Review of Past Proposals for Site and Current Climate;
  - Review of Hotel Development Opportunities;
  - Building Fabric Condition and Restoration Cost Analysis;
  - Edinburgh Luxury Hotel Market Analysis; and
  - Royal High School Position Statement June 2015.

- Environmental Statement  
The following issues are included in the environmental statement:
  - Access and transport;
  - air quality;
  - daylight, sunlight and overlooking;
  - ecology;
  - geology;
  - historic environment;
  - noise and vibration;
  - townscape;
  - waste;
  - water resources and flood risk; and
  - visual assessment.

### 3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states: *'Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.'*

Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states: *'In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'*

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states: *'In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'*

Therefore:

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

And:

Do the proposals preserve the listed buildings or their setting? If they do not there is a strong presumption against granting planning permission.

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

### **3.3 Assessment**

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

- a) The principle of development is acceptable;
- b) The impacts on the listed buildings are acceptable;
- c) The impact on the conservation area is acceptable;
- d) The impact on the landscape is acceptable;
- e) The impact on views is acceptable;
- f) The impact on the Edinburgh World Heritage Site is acceptable;
- g) The design is acceptable;
- h) The impact on trees is acceptable;
- i) The impact on neighbouring amenities is acceptable;
- j) The impact on transport and road safety is acceptable;
- k) The impact of archaeology is acceptable;
- l) The impact on geology is acceptable;
- m) The economic impacts are acceptable;
- n) The cultural impacts are acceptable;
- o) Other material considerations have been considered;
- p) Infrastructure requirements have been addressed;
- q) The environmental statement has been considered;
- r) The proposals are sustainable;
- s) Impacts on equalities and rights are acceptable; and
- t) Representations have been considered.

## a) Principle

The principle of the proposed development scheme requires to be assessed under relevant development plan and national planning policy.

### Scottish Planning Policy

The Edinburgh City Local Plan (ECLP) was adopted more than five years ago, in January 2010. Paragraph 33 of Scottish Planning Policy (SPP), states that if a development plan is more than five years old, the presumption in favour of development that contributes to sustainable development will be a significant material consideration. SPP lists a number of sustainable development principles which should be used to guide decisions including:

- giving due weight to net economic benefit;
- responding to economic issues, challenges and opportunities, as outlined in local economic strategies;
- supporting good design and qualities of successful places;
- making efficient use of existing capacities of land, buildings and infrastructure including, supporting town centre and regeneration priorities;
- supporting delivery of accessible housing, business, retailing and leisure development;
- supporting delivery of infrastructure, for example transport, education, energy, digital and water;
- supporting climate change mitigation and adaptation including taking account of flood risk;
- improving health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation;
- having regard to the principles for sustainable land use set out in the Land Use Strategy;
- protecting, enhancing and promoting access to cultural heritage, including the historic environment;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- reducing waste, facilitating its management and promoting resource recovery; and
- avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.

The proposed provision of the hotel development at this city centre location complies, in general terms, with sustainable development principles relating to accessibility, owing to its central area location, where public transport facilities are readily available. The re-use of an existing building also contributes to the sustainable nature of the development. The proposals will introduce a high quality, mixed-use development on an underused site which will promote place making and contribute to the economic growth and general well being of the wider City. The proposals are considered to be consistent with these principles. The extent to which these proposals meet other SPP principles, notably those relating to the protection of the cultural and natural heritage, quality of place, as well as economic impacts, are taken into account in the relevant sections of this assessment.

## Local Plan

While the ECLP is more than five years old, its policies remain relevant as many of these have been taken forward in the proposed Second Edinburgh Local Development Plan (LDP).

ECLP Policy Emp 5 (hotel developments) states that hotel development will be permitted in the central area, where development may be required to form part of mixed use schemes, if necessary to maintain city centre diversity and vitality, especially retail vitality on important shopping frontages. The site is not in retail frontage, therefore there is no requirement to provide mixed use at ground floor level. The proposed hotel use is acceptable in relation to local plan policy. This policy is echoed by Policy Emp 10 of the LDP.

Under ECLP Policy Ret 12 of the ECLP and Policy Ret 10 of the LDP the change of use of premises to restaurant or public house uses is only supported where there would be no unacceptable increase in noise disturbance or other impacts, which would be detrimental to residential amenity; and providing the premises are not located in an area where there is an existing concentration of such use uses. The proposed development is not situated in an area where there is a concentration of such use types. The potential impact of the proposed class 3 restaurant and public house uses on neighbouring amenity is addressed in section 3.3 (i) below.

The site is located in the Central Area as designated under Edinburgh City Local Plan (ECLP) policy Ca 1, which supports proposals for comprehensive development schemes which accord with the provisions of the relevant site development brief or guidance. This policy also provides that the use should be suitable for the site, its characteristics, and level of accessibility.

## Princes Street Block 10 Development Brief

The Princes Street Block 10 Development Brief - Approved by Planning Committee 15 May 2008 sets out development principles for the Royal High School and its immediate surroundings. The three principles are:

- 1) to promote the viable re-use of the former Royal High School and campus buildings as a visitor facility and civic/cultural destination;
- 2) to enhance movement and access to and from the former Royal High School campus and the Old Town; and
- 3) to respect and enhance key views to and from the area and protect the setting of the former Royal High School.

Although seven years old, these principles remain relevant.

In relation to principle 1, this guidance supports hotel use at the eastern end of the site, highlighting the Gym Hall and the 1924 luncheon hall building as a development opportunity for such a use. The guidance also seeks cultural, orientation and information use as well as museum and exhibition use and other mixed uses for the remainder of the site. Nevertheless, the proposed hotel use is consistent enough with the aims of principle 1 of the Development Brief as to comply with it.

In relation to access to and around the site, this is assessed in section 3.3 j). In relation to the impacts on the Royal High School, this is assessed in detail in section 3.3 b) as well as in sections 3.3 c), d), e) and f).

In conclusion, in respect of SPP generally, local plan policy and the Princes Street Block 10 Development Brief, the proposed hotel use is acceptable in principle, subject to other policy considerations.

## **b) Impact on listed buildings**

There are three main aspects to the consideration of the impact on listed buildings:

- Impact on features of special architectural or historic interest;
- Impact on setting; and
- Demolition.

These are considered in turn.

### Impact on features of special architectural or historic interest

#### *Impact on listed buildings*

The Scottish Historic Environment Policy (SHEP) sets out the context within which proposals for alterations to listed building must be assessed. SHEP is an important material consideration. This document states:

*Where a proposal involves alteration or adaptation which will have an adverse or significantly adverse impact on the special interest of the building, planning authorities, in reaching decisions should consider carefully:*

- a. the relative importance of the special interest of the building; and*
- b. the scale of the impact of the proposals on that special interest; and*
- c. whether there are other options which would ensure a continuing beneficial use for the building with less impact on its special interest; and*
- d. whether there are significant benefits for economic growth or the wider community which justify a departure from the presumption set out in paragraph 3.40 above.*

The former Royal High School is a nationally, as well as internationally, important building. The building is the finest example of Greek Revival architecture in Scotland with no other building matching it in terms of ambition, site, function or form. It stands not only as an architectural masterpiece but also as one of the most culturally important buildings of its time. It is one of the most significant buildings in Scotland.

SHEP states that buildings '*can be robbed of their special interest either by inappropriate alteration or by demolition.*' There is, therefore, a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting. A number of significant interventions are proposed.

Historic Scotland object to this application and the corresponding listed building consent application stating that:

*Both wings, and specifically the six-storey western bedroom wing, would, by their height, scale and massing, dominate and overwhelm the listed building challenging its primacy on the site. The proposals would, if implemented, diminish significantly the building's status as an internationally-acclaimed exemplar of Greek Revival architecture. The harm to the setting and character of the building would be considerable, it being impossible to view and appreciate Hamilton's masterpiece, either by itself or in context, without the oversized extensions taking precedence.*

Edinburgh World Heritage also objects commenting:

*The Royal High School is a building of exceptional and unquestionable architectural interest carefully composed and positioned. The proposals will in effect both diminish the building and remove its setting, placing buildings up to six stories sitting on a raised plinth on either side. It in effect turns Hamilton's building into an object, rather than an integrated part of an historic urban landscape. Our view is that the proposals are exceptionally insensitive to the importance of the building and will have a negative impact on OUV.*

The Heritage Assessment, submitted with the applications, provides detail of the various alterations proposed to the listed building and an evaluation of each interventions impact on the external fabric of the listed building. This assessment clearly states that whilst a number of alterations to the building have beneficial or minor impacts, a large proportion of the proposed interventions have adverse impacts on the character of the building.

The proposed wings are extensions of the main listed building on site. These have significant adverse impacts on its special character. These extensions do not show subservience or respect the composition or integrity of the listed building cannot be supported regardless, of design quality or attempts by the architect to minimise their impact. The importance of the Hamilton building would be significantly diminished by the new wings with the scale, massing and height of the new build dominating the main building in an unacceptable manner compromising both its character and setting. The applicant has sited viability and operational requirements as the reason for the scale of the proposed new buildings. Whilst this argument may be used to justify some alterations to the building, the resulting harm significantly outweighs the benefit of bringing the building back in to use.

The manner in which the new extensions join the listed building also has significant adverse impacts on the character of the main Hamilton building. Both the side elevations of the Hamilton building are carefully detailed and visibly symmetrical facades. The desire to access the facade at two different positions with two different approaches would adversely affect this symmetry, the lower floor of which would become an internal courtyard with limited external visibility, rather than an important open element of a considered and visible facade. These interventions clearly fail to respect the integrity and composition of the Hamilton building, having a significant adverse impact on the special character of the building. Alternative methods of joining the building in a more sensitive manner, such as at low level only, were proposed and rejected by the applicants for operational reasons.

The Hamilton building is designed to be seen in the round. Therefore, the flanking pavilions add significant importance to the overall composition of the building and site. The manner in which the new extensions interact with the pavilion buildings, enclosing them on their south facade and removing the historic steps down to the front plinth is an unacceptable alteration which clearly has an adverse impact on the integrity, composition and special character of the listed building.

The proposed glazed link buildings to be attached to the rear elevation of the listed building are acceptable in principle. It is recognised that the building suffers from a lack of circulation due to the plan form of the building. Though an addition to the rear of the building is not ideal, the approach adopted is visually lightweight and sensitively handled.

The service access proposed from Regent Road is also a significant intervention. A large opening is required for service vehicles, which will involve the removal of a Grecian door. It is acknowledged that this door is possibly the only door within the complex which has survived in its original state from not having been discarded in the alterations of the late 1970s. The new opening would be significantly larger and though carefully designed would be out of scale and proportion to the building impacting on its architectural integrity, composition and special character in a negative way.

The modification of the rear windows to new entrance doors, as part of the proposals for the north elevation to be the main entrance to the hotel, is acceptable. Whilst access to the building will be possible to the south of the building from Regent Road, the north elevation provides the opportunity to create the entrance to the hotel and the lowering of the windows to doors is, in this instance, justifiable. Again, the detail of this intervention would be sensitively handled.

As the portico would be accessible to the public from the main assembly hall, railings are proposed, to be located on the inside of the columns. These railings would be simple in design. If Committee is minded to grant planning permission, a condition is recommended to ensure an appropriate material and detailing to match the existing railings on the building.

At the west end of the site, the original set of entrance gates, pillars, outer pillars and balustrading designed by Thomas Hamilton will be removed to accommodate the new west bedroom wing. The boundary walls and railings are an integral part of Hamilton's original design for the site and their removal would have an adverse impact on the integrity, composition and character of the listed building.

Reinstatement of the retaining wall and belvedere are considered to be conservation benefits. However, the new build elements will mostly obscure such features when viewed from the south.

Internal works, which fall outwith the remit of the planning application, are considered in the accompanying report on the listed building consent application: 15/03990/LBC.

The SHEP states that there is a presumption against works that adversely affect the special interest of a listed building or its setting. The proposals clearly have a significant adverse impact on the special interest of one of Scotland's most significant buildings affecting its architectural integrity and composition and impacting on its special character and setting. Whilst bringing the building back into a long-term future use is considered to be a significant conservation benefit, the current proposals are not considered to be a conservation based approach to redevelopment of the site with the new build extensions impacting on the Hamilton building in a significantly adverse manner. Whilst it is acknowledged that a number of proposals are necessary to allow the building to be functionally successful, the redevelopment of the site fails to respect the huge significance of this building to the detriment of its special character and setting. The proposal does not meet the requirements of the SHEP in this regard.

#### *Local plan policy*

The proposal does not meet the requirements of ECLP Policy Env 4 or LDP Policy Env 4 in respect of alteration and extensions, as the proposal would damage the historic building and its interest.

#### Demolition

The Former Royal High School is a category 'A' listed building. Within this listing are the main Hamilton building, the lodge building to the west of the main building and the classroom block to the east. There are also two additional buildings within the curtilage of the listed building that are listed by virtue of pre-dating 1948. All four of these additional buildings are proposed for demolition.

Bringing a category 'A' listed building back into a long-term, sustainable future use is considered to be a significant conservation gain. The former Royal High School building has been unoccupied since 2012, with ongoing temporary uses. It is on the Buildings at Risk Register for Scotland. Through the pre-application process it was established that to allow for a viable future development of the site, demolition of the classroom block and redevelopment of the east of the site may be necessary. It was accepted that a case for the demolition and redevelopment of the gymnasium/classroom block could be made if it enabled a conservation-based solution for the remainder of the site but, as assessed above, the current scheme is not sympathetic or conservation-based. As such, the demolition of this building must comply, in full, with one of the SHEP tests. The principle of demolition of the lodge building or redevelopment of the west side of the site has never been accepted and must be justified against the provisions of the SHEP.

Once lost, listed buildings cannot be replaced. There is, therefore, a presumption against their demolition. Historic Scotland's Managing Change in the Historic Environment guidance document on demolition states:

*'Listed buildings are buildings of architectural or historic interest and contribute significantly to the quality of our built environment, the economy and cultural heritage. The loss of any listed building leads to the erosion of an area's character, distinctiveness and sense of place. The interest of a group of listed buildings can also be damaged by the demolition of a constituent part. There is therefore a strong presumption against the demolition of any listed building'.*

It goes on to say that *'positive efforts must always be made to retain listed buildings, using their presence as an opportunity to stimulate regeneration in creative and imaginative ways'*.

SHEP and the Managing Change in the Historic Environment guidance note on demolition set the policy context for dealing with applications for the demolition of listed buildings. SHEP states, at paragraph 3.50, that *'it is Scottish Ministers' policy that no listed building should be demolished unless it can be clearly demonstrated that every effort has been made to retain it'*.

Within this policy context, paragraph 3.44 of SHEP requires that the following factors are taken into account in determining whether such proposals are justifiable:

- a. whether the building is not of special interest; or*
- b. whether the building is incapable of repair; or*
- c. whether the demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or*
- d. whether the repair of the building is not economically viable and; that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.*

One or more of these tests must be addressed in full for consent to be granted for the demolition of a listed building.

The overarching policy objective of the SHEP is the retention of listed buildings, unless all efforts to secure their retention have been exhausted. Any attempt to justify demolition of a building requires applicants to set out clearly the practical steps that have been taken to try to keep the building and must be supported by evidence to show why these have failed, including meeting one of the four SHEP tests, in full.

The applicants have chosen to focus their case for demolition on tests a) and c) of the SHEP. They have chosen not to address tests b) or d).

The applicants argue that the demolition of the gate lodge is justified by the application of test c) of Clause 3.44 - that the loss of the building is essential to delivering significant benefits for economic growth and that the proposed scheme is of national or regional significance, as set out in the series of economic and viability reports accompanying the application.

The demolition of the former gymnasium and classroom block is considered, by the applicants, to be justified by the application of two of the relevant tests under the SHEP. Firstly, test a) in that that the building does not possess special merit that would justify its listing in terms of Annex 2 of the SHEP. Secondly, test c) that the loss of the building is essential to delivering significant benefits for economic growth and that the proposed scheme is of national or regional significance.

### *SHEP test a)*

Test a) requires that the applicants show that 'the building is not of special interest' as set out by Annex 2 of the SHEP. This sets out the following criteria against which the special interest of a building is assessed:

#### *1. Age and Rarity*

#### *2. Architectural or historic interest including:*

- a. Interior.*
- b. Plan form.*
- c. Technological excellence or innovation, material or design quality.*
- d. Setting.*
- e. Regional variations.*

#### *3. Close historical associations*

In relation to this test, the gymnasium building and the lodge building remain of architectural and historic interest. These are carefully designed buildings of architectural merit in their own right and through their positioning, contribute to the wider architectural and historic interest of the Royal High School site. No formal request has been made by the applicant for Historic Scotland to review the listed status of the building prior to the submission of the PAN. As it stands, Historic Scotland have been clear that, the buildings are category A listed and made no indication these building would be delisted as part of a listing review. While it acknowledges that the demolition of these buildings could be justified by a conservation based approach to the wider site, it states that the current proposals do not reflect this requirement. As such, the case for demolition of this building must be assessed under the provisions of SHEP test c) as it fails the requirements of test a).

With regards to the luncheon block at the south east of the site and the classroom block at the north west of the site, they are listed by virtue of pre-dating 1948 and being within the curtilage of the site. There is justification for demolition based on test a) of the SHEP. Neither building is listed in its own right. The demolition of these buildings would have a positive impact on the character and setting of the main Hamilton building. As such it is accepted that their demolition meets the requirements of SHEP test a).

### *SHEP test c)*

In order to meet test c) it must be argued that the demolition of the listed building is essential to enable significant benefits to economic growth, or the wider community, to be delivered. For the test to be met it therefore follows that similar benefits cannot be achieved with the buildings retained in a manner that also retains their special interest.

There are two main elements to this test. Firstly, whether the development would contribute significant benefits to economic growth for the wider community, and secondly, the essentiality of demolition to achieving this. These are assessed separately.

In support of its case, the applicant has submitted a series of economic and viability reports.

#### *Whether there is a significant benefit to Economic Growth*

Historic Scotland state that *'for the purposes of SHEP test c), benefits derived from the proposed demolition must be 'substantial (and able to be quantified), and should be of national, or at least regional significance'.*

The applicant has submitted a range of background documents, containing economic/financial appraisals, as well as viability studies, in support of this application. Together, these reports are intended to address the economic case behind situating the hotel in this location, the extent of demolitions required and the scale and massing of the proposed new build. Economic Development has advised on the benefits to the local and city wide economy resulting from the siting of the hotel at this location.

#### *Demand*

The conversion to a luxury hotel would assist in addressing the demand for high quality hotels accommodation in Edinburgh, as identified in the 2012 Tourist Accommodation Audit. It is noted that four new luxury hotels are currently in the pipeline in Edinburgh, but the Audit reports that there is still an estimated shortfall of rooms required by the target date of 2021. The development would help meet demand for high quality hotel accommodation.

#### *Job Creation*

The site is one of the Edinburgh 12 Strategic Gap sites in the city centre, identified by the Council in 2013, in view of their potential to deliver the greatest economic impact within the next five years. Collectively these sites have been estimated to potentially support approximately 19,000 full time jobs.

Edinburgh City Local Plan recognises the importance of tourism to the City's economy and states that tourism is the third largest source of employment. The supporting documents estimate that the proposed hotel would support approximately 260 jobs at the hotel itself. However, it is noted that the delivery of the benefits to the local community would depend on the extent to which the proposed hotel operator would create training opportunities for local residents. The development could also potentially support a total of 840 jobs in Edinburgh (once supply chain expenditure, staff expenditure and visitor expenditure are taken into consideration) and increase the city's economic output by £31.5 million per annum.

#### *Whether demolition is essential*

The second consideration in relation to SHEP test c) is whether the demolition is essential. Essentiality requires the applicant to show that demolition of the building is the only option to delivering significant benefits to economic growth. There are two aspects to whether demolition is essential. Firstly, there is viability and secondly there is the locational aspect.

## *Viability*

The Assessment of Economic Viability of Alternative Uses (September 2015) submitted by the applicant includes an appraisal regarding the viability of the following uses: boutique or budget hotel; serviced apartments; care home; residential; student residential, office; museum. For each alternative use they have appraised three scenarios, including: i) retention of all existing buildings, ii) a combination of existing buildings and iii) new build and a mix containing a greater proportion of demolitions and new build.

The conclusions of the assessment are that the only truly viable alternative use is student residential. This would require conversion of the Hamilton Buildings, Luncheon Hall and West and East Pavilions to a mixture of bedroom and central service accommodation. The buildings to the east and west end of the site would be demolished with new build blocks constructed in their place. However, it is also noted that if the Council were to adopt a different ownership structure (in relation to the arrangements currently proposed for it and the hotel), then residential use may also be viable at an increased development density. The findings also state that for all uses to be viable, demolition of the buildings to the east and west of the site, together with substantial new build, would be required.

It is acknowledged that the proposed hotel establishment, by comparison with such alternative uses (as student or mainstream residential accommodation), could potentially allow substantially more floor area to be open to the public (27%, as estimated by applicant).

The conclusions of the viability assessment are accepted. It is unlikely student accommodation could allow the degree of public access that the hotel use could provide. In terms of providing access to the building therefore, the hotel use (including ancillary arts and culture uses) may better meet the ambitions for the site as set out in the Princes Street Site 10 Development Brief.

## *Location*

Colliers International was instructed by Duddingston House Properties and Urbanist Hotels to identify and assess possible alternative hotel development opportunities within Edinburgh for their suitability and availability to accommodate a world-class hotel.

Edinburgh city centre currently has four five-star hotels, which between them provide a total of 834 bedrooms. These are:

- The Balmoral.
- The Waldorf Astoria.
- Quorvus G&V (formerly Missoni).
- The Sheraton Grand.

The alternative sites considered as part of this study were:

- 1) Former Donaldson's School, West Coates;
- 2) Fountainbridge A;

- 3) Fountainbridge B (under separate ownership);
- 4) Fountainbridge C (under separate ownership);
- 5) 42 St Andrew Square / West Register Lane;
- 6) General Register House;
- 7) Dundas House/RBS Buildings St Andrew Square;
- 8) Former Scottish Provident Building;
- 9) New St James' Quarter;
- 10) Baxter's Place;
- 11) Argyle House/King's Stable Road;
- 12) Morrison Street;
- 13) Castle Terrace Car Park;
- 14) Car Park to Rear of Waverley;
- 15) New Waverley (formerly Caltongate);
- 16) India Buildings;
- 17) St Andrew's House; and
- 18) Dewar Place/Exchange 2.

The assessment concludes that there are many sites around Edinburgh which are suitable and available for a hotel development, such as at the St James Quarter and St Andrew Square. However, none offer the opportunity that is being offered by the Royal High School. Based on the evidence provided, it is accepted that most of the sites investigated could not accommodate a hotel of luxury brand quality. The report does not conclude that the building is the only building in the city that could accommodate such a development but highlights the constraints that are present on other sites within the city and state that in the present market the Royal High School site represents the pre-eminent opportunity. This conclusion is accepted.

#### *Overall conclusion in respect of SHEP*

It is accepted that there would be significant benefits to the economy and to tourism resulting from the provision of the proposed hotel at this landmark location within the city. Whilst the planning system can have no remit over the type of hotel use, it is clear that a hotel of the very highest quality is proposed. The quality provided will attract high spending tourists and business people. This is a sector of the hotel market that Edinburgh does not adequately cater for. As a result, the development could make a very positive contribution to Edinburgh's economy and contribute significant benefits to economic growth for the wider region and nation. A case has been made for the demolition of the listed buildings that goes some way to meeting the provisions of test c) of the SHEP.

However, while test c) requires that the demolition of the listed building is essential to delivering significant benefits to economic growth, the demolition needs to be considered alongside replacement proposals. The effects of the proposals are considered in detail in the other sections of this report.

Notwithstanding this, the demolition of the luncheon building and the classroom block is accepted.

## *Local Plan Policy*

The aim of the national policy is reinforced by the Edinburgh City Local Plan policy ENV2 and policy Env 2 of the Second Proposed Local Development Plan which state:

*Proposals for the total or substantial demolition of a listed building will only be supported in exceptional circumstances, taking into account:*

- a) the condition of the building and cost of repairing and maintaining it in relation to its importance and to the value to be derived from its continued use.*
- b) the adequacy of efforts to retain the building in, or adapt it to, a use that will safeguard its future, including its marketing at a price reflecting its location and condition to potential restoring purchasers for a reasonable period.*
- c) the merits of alternative proposals for the site and whether the public benefits to be derived from allowing demolition outweigh the loss.*

Criteria a), b) and c) need to be considered together.

The value of returning the main Hamilton building to a long term future use cannot be underestimated. The viability of the hotel proposals is dependent on the demolition of the classroom/gym block and the gatehouse lodge and it is accepted that the economic benefits to the city, region and nation are significant enough to justify this demolition whilst returning the Hamilton building to a sustainable use. As such, part a) of the local plan policy has been addressed.

The adequacy of efforts to retain the building in, or adapt it to a use that will safeguard its future are similarly assessed above. The building has not been marketed. It therefore does not meet the requirements of criterion b) of the policy. In this instance though, it has been accepted that a conservation based approach to the Hamilton building could justify the demolition of the gym/classroom block.

As assessed below, the proposals do not put forward a conservation based approach to the Hamilton building with the extensions and significant interventions detracting from the architectural composition, integrity and character of the listed building. While public benefits of the proposed scheme exist, they do not justify the interventions and extensions and fail to comply with local plan policy.

## Setting

Historic Scotland's document 'Managing Change in the Historic Environment Setting' states:

*Setting should be thought of as the way in which the surroundings of a historic asset or place contribute to how it is experienced, understood and appreciated. Monuments, buildings, gardens and settlements were not constructed in isolation. They were often deliberately positioned with reference to the surrounding topography, resources, landscape and other monuments or buildings. These relationships will often have changed through the life of a historic asset or place. This often extends beyond the immediate property boundary of a historic structure into the broader landscape context.*

The proposed substantial sized extensions at each side of this iconic building destroy this carefully planned relationship between buildings and landscape, which is important to the setting of Hamilton's building. Although designed so that their floors step away from Hamilton building, the proposed extensions are significantly greater in footprint and height than Hamilton's building. The western extension has the most significant effect. It is visually more prominent and is positioned in a space currently occupied by landscaping and a car park. No longer would this listed building be seen with landscape on either side. Instead the immediate backdrop is dominated by the proposed extensions, thereby diminishing the building's prominence on this carefully conceived site. This impact can be seen clearly in the sequence of view from Radical Road (EIA Views 8 and Edinburgh Design Guidance Key View E2d) and views from Queen's Drive (EIA view 9b and Key View E3) (refer to paragraph 3.3(e) for further details). Closing in the space around this listed building would also damage its setting by intruding on views of St Andrews House and other listed monuments on the hill.

The design of the Royal High School was conceived integrally with the National Monument above. It was placed on the side of the hill, mimicking the relationship of the Propylea (the Lesser Temple and gateway building) to the Parthenon (National Monument) on the Acropolis (Calton Hill). It therefore strongly helps give Edinburgh the name: *the Athens of the North*. As well as commanding a prominent position on Calton Hill, it terminates Regent Terrace and provides the foreground for the arrangement of buildings on Calton Hill. The ancillary buildings, the Burns Monument and the landscaped setting of the historic gardens frame this classical centrepiece.

The monuments on top of Calton Hill are also designed to be seen within a picturesque landscape. A significant proportion of the landscape beneath the monuments is lost in certain views. This damage to their picturesque setting diminishes their presence and impacts on their relationship with the setting of the Royal High School Building. The setting of Nelson's Monument is severely damaged in view from Regent Road and Canongate Kirkyard (EIA Views 21b and 19) where the extensions take up the landscape space below the Monument.

The setting of the National Monument is damaged in views from Arthur's Seat (EIA view 10), from Queen's Drive (EIA view 9a), from St Anthony's Chapel (EIA View 11a) and particularly from Holyrood Park (EIA View 11c).

The development fills in 'the visual breathing space' that is provided for the category 'A' listed, St Andrew's House and creates a more continuous development along the road. Views 10 (CEC Key View E5) and view 22 clearly show this. This effect erodes the landscape setting of St Andrew's House.

There is a slight adverse impact on the setting of the Category 'A' listed Building on Regent's Terrace, when viewed next to the significant scale of the proposed eastern extension.

The Burns Monument was also designed as part of the collection of classical monuments on the hill. Whilst the proposed east wing will affect the setting of the monument, the impact will not be significant.

The eastern wing would be seen from the Gardens at Holyrood Palace, particularly during the winter months, altering the view from the palace. However, this impact is not significant.

The proposal for a new hotel would have a significantly adverse impact on the character and setting of The Royal High School building, as well as other listed buildings and monuments, including The National Monument, Nelson monument and St Andrew's House.

The proposal does not comply with policies Env 2, Env 3 and Env 4 of the ECLP and policies Env 2, Env 3 and Env 4 of the LDP.

### **c) Impact on the conservation area**

#### Impact on Character of NewTown Conservation Area

The site is in the New Town Conservation Area. The essential characteristics of the New Town Conservation Area Character appraisal include:

*The overwhelming retention of buildings in their original design form, allied to the standard format of residential buildings strongly contributes to the character of the area*

*The important contribution that the cohesive, historic skyline makes to the conservation area, means that it is particularly crucial to control incremental creep in building height, especially along skyline ridges*

*A richly varied topography of ancient landform shaped by volcanism and later by glacial scouring.*

*Internationally important private and public open spaces lying within, and on the edge of a neoclassical grid pattern and reflecting the picturesque tradition of landscape improvement.*

*Gardens that create open and framed long distant picturesque views of exceptional quality.*

*The presence of high quality boundary elements, including random rubble' walls and black railings in stone copings, often curved.*

The Royal High School and Calton Hill are key elements of the New Town Conservation Area. The Royal High School was purposefully designed and sited on a prominent location within the landscape setting of Calton Hill. The other monuments of the Hill are designed to be seen alongside one another within this urban landscape.

The large scale and massing of the proposed extensions overwhelms the Royal High School and diminishes its presence at this highly prominent and sensitive site. This has a significant detrimental impact on a key landmark building and its setting which damages the Conservation Area. This can be seen clearly in the sequence of EIA Views 8 from Radical Road (CEC Key View E2d) and EIA view 9a and 9b from Queen's Drive (CEC Key View E3).

The skyline is damaged in certain views and is further explained in section 3.3 e) (Views from the south).

The appreciation of this landscape characteristic, in particular the 'crag and tail' landform at Calton Hill is damaged by blocking views towards the hill, as explained in section 3.3 d).

This picturesque landscape is damaged due to the loss of views to the hill and the setting of the monuments explained in sections 3.3 d) and 3.3 b).

The development on the west blocks views from Calton Hill, a significant and visually prominent element of the New Town Gardens Inventory Designed Landscape, to the Old Town, thereby damaging this essential characteristic. This can be seen in EIA View 32b and 32c.

To facilitate the development it is proposed to remove historic elements, including gate piers and boundary railings. This would damage the essential characteristic of the conservation area in relation to boundary features.

The extensions would have a markedly negative effect on the Conservation Area damaging many of its essential characteristics. The listed buildings and the damage to their setting is described in paragraph 3.3 b). These historic assets are an integral part of the character of the conservation area. An adverse impact on their setting therefore has a resulting detrimental impact on the conservation area. The proposal is contrary to ECLP Env 6 - Conservation Area Development and similar LDP Policy Env 6.

#### Impact on Character of Old Town Conservation Area

The essential character of the Old Town Conservation Area, which is located to the south of the application site are also damaged. These include:

*A landscape and topography formed by vigorous geological activity.*

*The quality of long distance views both open and framed in out and through the spaces, and views from different levels and idiosyncratic angles.*

The views to this prominent landscape and the appreciation of its topography are damaged by the size of the proposals. In views from the Castle Ramparts some of the landscape of Calton Hill would be hidden behind the western extension. The effect is much more prominent in views from nearer the building however. In the Canongate Kirkyard, the location in the Old Town where the Royal High School is closest, there are adverse impacts on views (EIA Views 19a and 19c).

#### **d) Impact on landscape**

The landscape of Calton Hill is in itself of significant importance. Calton Hill is part of the geological formation of the Arthur's Seat volcano, along with Salisbury Crags and the Castle Rock. It is a 'crag and tail' landform that is a result of geological processes including glaciations. Largely as a result of its geology, it is a site of special scientific interest (SSSI). This is assessed in more detail in section 3.3 l).

Appreciation of this hill formation will be damaged by the proposals, particularly where the development rises above the landform and blocks views to the hill. This is contrary to ECLP policy Des 3, which aims to protect the landscape by ensuring development would have a positive impact and ECLP policy Des 10, the tall buildings policy, which aims to prevent an adverse impact on landscape features. It is also contrary to ECLP policy Env 11, which aims to protect the character and appearance of important landscape features.

The damage to the appreciation of the hill form can be clearly seen in view from the South. Damage to the wooded skyline and loss of the ridge is visible in views such as View 19c. The development will damage the appreciation of the hill primarily from the south of the city in local and city views, but also in east and west views. This is a concern which has been raised by Scottish Natural Heritage (SNH).

Calton Hill is a dramatic historic landscape. This was the first public park in Scotland. Views out of the site are important and part of the history of the area. The Hill is part of the Inventory Gardens and Designed Landscapes 'The New Town Gardens'. The Scenic Value, Works of Art, Architectural, and Historic Value have been noted as 'Outstanding'. These views from Calton Hill are damaged by the proposals as they introduce new focal points looking south (View 16) and block views of the city from the walk down the hill, severing the connection between the hill and the Old Town (View 32b and 32c). The impact on the views affects the unique sense of place that attracts many people from the local area and wider city environs, as well as well as tourists and visitors to festivals and events. Damage to the place and views is contrary to ECLP policies Des 1, Des 3 and Env 7 - Historic Gardens and Designed Landscapes.

Calton Hill is also a carefully laid out semi-rural landscape in the middle of the city. The site was envisaged as part of a picturesque rural scene that connected with, and brought in, the rural landscape to the town. Each monument within this landscape was placed for dramatic effect in relation to views and paths. There is sufficient landscape space around each element to be appreciated individually and sequentially. The way this comes together creates a unique urban picturesque landscape. The loss of the landscape space damages these relationships and is contrary to Policy ENV7, that states development will not be permitted which would have a detrimental impact on the character, as particularly seen in EIA view 8a, from Radical Road (key view E2d) and 19c, from Canongate Parish Church burial grounds. The introduction of a pair of buildings, of the same architectural style, is uncharacteristic in an area where buildings are seen as individual and unique. Overall, the scale and mass of these large structures will severely damage the unique composition that forms part of the sense of place of the site.

Hamilton designed the building so that it is perceived as an impressive building of some height. However, in reality it is relatively small. This is a result of the long horizontal walls, the elevated position of the Hamilton Building and the position of the pavilions. An illusion of scale was therefore created. This can be seen in EIA View 19c. The substantial scale of the proposed development, in comparison with the existing buildings and monuments, will damage this illusion. Damaging this visual characteristic is contrary to policies including ECLP Policies Env1 (World Heritage Site) and Env3 (Listed Buildings - Setting) which seek to protect historic characteristics.

In summary, the hill is an urban, picturesque landscape with unique monuments, which uses their relationships to evoke a sense of connecting to places beyond Scotland, particularly Greece. This composition results in a series of scenes, like paintings, internationally recognised that has given Edinburgh the 'Athens of the North' name. It is visible from many locations in the city and has a strong sense of place, enjoyed by many international and national visitors, and local residents, for a variety of reasons. It is highly sensitive to change. These large structures will damage the special landscape quality of this internationally recognised, symbolic landmark.

The proposal does not comply with Policies Env 7 of the ECLP and Env 7 of the LDP.

### **e) Impact on views**

A comprehensive visual analysis has been provided in the Environmental Statement. There are 32 different views, and eleven of these are sequences. In some views, there is no impact because it will not be possible to see the building. However, in many views there is a significant effect. Unlike the Environmental Statement that considers that there would be difficult but reversible change, the visual change will be a permanent and highly unlikely to be reversible given the level of investment involved. As a permanent change, this raises the number of views that are considered significant in EIA terms.

#### Views from the South

In city views the development will be clearly visible. From the north facing slope of Arthur's Seat, (View 10) (CEC Key view E5), the development will be obvious. The new wings will block some of the hillside from view, which will be particularly noticeable at certain times of the year, depending on the season. This will damage the appreciation of the hill and change the composition of development along the street. The east wing will create a strong horizontal element in the view which is out of keeping with the rhythm of the existing buildings. The mass of the new building competes with the National Monument on the top of the hill creating a more prominent focal point than the gymnasium block. From the top of Arthur's Seat (View 29) there is a significant view. However the proposals would not be a beneficial change due to the loss of views to the hillside.

Competing with the National Monument will also be a problem from St Anthony's Chapel, (View 11a, CEC Key View E6c). Again the east block is larger and more solid than the existing gymnasium building and in certain lights it will not be perceived as part of the hillside which will intrude on the view. The view from Radical Road is exceptional and frequently visited by tourists. Views 8 a), b)(CEC Key View E2d) and c) describe the sequence. On bright sunny days there are clear and sharp views to the site and the development will appear as very large buildings, regardless of how carefully they are designed to blend with the hillside. The overall mass and size of the new development overwhelms the Royal High School and blocks views to the hill. The eye would be drawn from the skyline to the Royal High building and towards the new development, firstly because of their sheer size and secondly because they are the only buildings in the monument area of the hill which appear as a pair, in the same architectural design style. Every other monument differs in form.

Further around in Holyrood Park, the View from Queen's Drive has been examined in sequence EIA Views 9 a) and b) (CEC Key View E3c). There is a significant impact on 9a), as the development will be a noticeable component of the view. The development blocks a significant proportion of the hillside, which is key to providing a setting to the Royal High School and the Nelson Monument. The size and mass of the development is so large that it becomes an unwelcome focal point within the view as it draws the eye away from the composition of the monuments on the hill.

Views from the Old Town are also affected. For example, views from Canongate Parish Church (EIA View 19a) have been reported as significant and adverse in the Environmental Statement. This assessment is supported as the development interrupts the distinctive ridge line of the hill and damages the relationship of Nelson's monument to the hill. Also from the Canongate Parish Church EIA View 19b the development damages the view to the woodland ridge, because the development is higher than the existing. However, the greatest impact comes from the Burial Ground itself, also a historical EIA view 19c. Due to the height and size of the development, the relationship between the Royal High School and its picturesque setting is lost. The distinctive ridgeline of the hill and the setting of Nelson's monument are lost. The visual illusion of scale is damaged and its relationship with the hillside lost.

Views 22 and 23 from Market Street and Jeffrey Street both show how the development blocks views to the landscape of the hill, and infills the space specifically designed to allow St Andrews House and Royal High School to be perceived as separate entities on a hillside, as opposed to a string of buildings. View 22 also shows how the west block damages the appreciation of the ridgeline.

Local Views from the south will also change. The view from the Burns Monument towards the Royal High School is least affected, but the view from New Calton Burial Ground EIA View 18 c is significantly altered. Currently the gymnasium building is screened by trees and a wooded skyline. In the summer months the block is well screened and the landscape dominates the scene. The new development is above the canopy level of the trees, reflective in some lights, and will not be effectively screened, as the trees have to be cut back to enable the building to be constructed. This completely alters the impact of the view to one dominated by a new building. This loss of the landscape dominated street scene is an adverse result of development.

In the distant views from the south from the Braid Hills, EIA View 13 (Key View S7b), the West Wing of the development rises above the general roof line, and could in certain lights, alter the view. Damage to these views is contrary to many policies including ECLP Design, Des 10 Tall Buildings (which sets out the skyline policy), ENV 11 Landscape Quality and ENV7 Historic Gardens Designed Landscapes, which seeks to maintain the character and views to and from an Inventory Site.

#### Views from the east looking westwards.

There are very few distant or city views from the east looking west and none are adversely affected. In comparison local views from the east are significantly affected.

The Environmental Statement categorises the effect of EIA View 21 as significant. This is due to the West wing creating a dominant and noticeable feature. In EIA View 21a the building distracts from the Royal High School Building and in EIA View 21b the west wing obliterates the landscape setting of Nelson's Monument and alters the setting of St Andrew's House adversely. This is contrary to ECLP Policy ENV3 and ECLP Policy ENV8 which seek to prevent damage to the setting of listed buildings and monuments.

Moving westwards down the one of the main routes from the summit of the hill is the sequence of EIA Views 32. This is experienced by many tourists and local people. Views 32 b and c will be damaged as large structures will dominate the skyline and block important views to the Old Town, also shading the footpath. This is contrary to ECLP policy DES 1 and DES 3 and ENV 1 World Heritage Site.

#### Views from the west looking eastwards.

From the distance in the west, the views to the development are screened by Calton Hill.

In the city, the site is visible in views eastwards from the Castle Ramparts View 1 (CEC Key View C1a) and the Camera Obscura View 2 (CEC C2a). The development, although a small component of these views, can be seen to replace the greenery and fill in the space between St Andrew's House and the Royal High School in view 1 and reduce the perceived hill in view 2.

Local views towards the west of the site are reported in the EIA as significant and beneficial.

In views from Regent Road, the building's western extension, along with St Andrew's House would frame views to Arthur's Seat and Salisbury Crags. This creates an attractive townscape effect. However, this would also result in a severance of the existing visual link between these natural features and the landscape of Calton Hill. In this regard, the effect is adverse. The development creates a very prominent new focal point in view 27a but as it alters the intended relationship with the countryside, this change is significantly adverse. Further along the road travelling eastwards, the scale and height of the new development overpowers the view. This blocks the connection to the hillside and views to the historic building and sky, which in this case is adverse. This is considered contrary to ECLP policies Des 1 and Des 3 which support a scheme that responds to the site's special character and setting.

#### Views from the north

View 16 is the View from the top of Nelson's Monument; this is assessed as a significant view and beneficial change. Whilst the council recognises that the car park has no visual merit, it does not disturb the main baseline characteristics of the view and the eye is drawn to the far hills of Arthur's Seat and Salisbury Crags. The introduction of two new focal points distracts the viewer away from the far hills which is adverse. The size of the development overwhelms the Royal High School building.

## Night Time Views

The development will light up the Royal High School which will add to the night time scene in Edinburgh. However, the new build, bedrooms, will inevitably be visible even though the design of the lighting scheme has been carefully arranged to cause the west and east wings to recede. This will result in the lower terrace of the hillside appearing as a continuous, built-up street. The resulting illumination could compete with the potential dramatic impact of lighting up a unique building in a dark urban landscape setting.

In summary, the site is part of an internationally recognised landmark in the city's views and visible from many places in the south of the city. The development will damage the unique views of this site by the:

- Loss of the ridgeline, both wooded and more open;
- Loss of the relationship between wooded hillside and the sky;
- Loss of the appreciation of the hill by blocking views to it;
- The introduction of two large buildings on a hillside of unique individual buildings - damaging the composition of the buildings and the landscape;
- The introduction of large buildings that compete with the visual illusion of the relatively small monuments; and
- Filling in of the space around the Royal High School by creating a 'street of buildings', as opposed to buildings in a landscape.

The proposal does not comply with Policy Des 10 of the ECLP and Policy Des 11 of the LDP.

### **f) Impact on the Edinburgh World Heritage Site**

The development is contrary to ENV 1 World Heritage Site - Development. It would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh as a World Heritage Site and would have a detrimental impact on the Site's setting.

World heritage sites are places of Outstanding Universal Value (OUV), meaning they have cultural and/or natural significance which is so exceptional as to transcend national boundaries. World Heritage Site status is the only international designation offering protection of built heritage. In the UK, this protection is via the planning system; this includes national and local policy in relation to built and natural heritage that is assessed elsewhere in this report.

OUV is fixed by the World Heritage Committee at the time of inscription (in this case, 1995). It is encapsulated in a statement of Outstanding Universal Value (OUV). OUV needs to be sustained over time through protection of the attributes that convey it. In this case, the key characteristics identified are:

- Outstanding set-piece of neo-classical architecture;
- Topography;
- Townscape; and
- Juxtaposition of Old and New Towns.

The former Royal High School is the most important Greek revival building in the Edinburgh World Heritage Site - often regarded as one of the three most important buildings internationally of the Greek Revival - it contributes to Edinburgh's world recognition. It sits within a dynamic urban landscape. It is an integral part of the classical nature of Calton Hill and reflects the city's status as a capital and major centre of thought and learning. It also contributes to the city's iconic skyline, dramatic topography and planned alignment of key buildings, resulting in spectacular views and panoramas, both distant views and local views upon approaching the building. This is one of the main components of OUV. This makes Calton Hill, and consequently RHS, especially sensitive to the massing of new development in important views.

The relationship of the Medieval Old Town and the planned Georgian New Town provides a contrast of distinctive urban forms which is unrivalled in Europe. This relationship creates a historic environment of exceptional interest with unrivalled urban and landscape qualities that successfully incorporate all the functions of a thriving capital city. The building itself is a set-piece within this iconic scenery - a result of the picturesque movement - and it serves to define the visual boundary between the Old Town and the New Town. It is a focal point in views of Calton Hill from Queen's Drive/Holyrood Park, which strongly contributes to the understanding of the architecture and the meaning of the school. Conversely, the approaches along Waterloo Place and Regent Road offer a different experience of understanding: the school is not immediately visible; instead views are aligned so that the approach from both east and west invokes a dramatic sense of arrival. The view from Waterloo Place, itself a classical composition, invokes the sense of *rus in urbe* which is the illusion of countryside created by a building or garden within a city. This was the Enlightenment idea at the heart of urban planning in 19th and 20th centuries.

The landscape qualities of this area of the World Heritage Site have been described in the World Heritage Site Management Plan, the Inventory of the Designed Gardens and Landscapes and the candidate Special Landscape Area. The consultant's EIA also describes the landscape qualities of the hill. They state that the 'Calton Hill summit is a picturesque open semi-wild public park and that the green space contributes significantly to the character of the area through its diversity from wilder upper hill to managed gardens. The principle of undeveloped upper and lower slopes remains largely adhered to. The open space surrounds the Royal High School in views towards it. It acts as a frame, being prominent above, below and to the sides of the building. This contrasting semi natural landscape provides the setting and enhances the impact of the Royal High School building. These landscape qualities are key to the character of the hill and, as described in the report above, are damaged by the development.

The intention of proposing high quality architecture as a means of mitigating any negative impact to the site cannot be accepted as it is not only the impact on the architecture that should be considered, but the impact on the cultural value of the building, and of the hill, that reflects its link to Enlightenment thinking and that strongly contributes to OUV. This reflects the point that the OUV is greater than the sum of its parts and the overall impact of the proposals must be considered in the round. In this context, the proposals fail to comply with the development plan.

For the reasons set above, the conclusions of the Heritage Impact Assessment are not accepted.

The proposals do not comply with Policy Env 1 of the ECLP and Policy Env 1 of the LDP.

## **g) Design**

### Architectural Design

The proposal has been through a considerable design process, with the scheme evolving from the competition scheme in 2010 through to the planning application scheme that is subject of this report.

The principal aspect of the design, the idea that the Hamilton Building should be extended east and west has remained consistent. The proposal has increased in scale as the developer has developed the brief. The size of the extension is a result of the commercial requirements for this type of hotel. The applicant has been clear that the number of bedrooms proposed is needed to achieve the critical mass necessary for the scheme to stack up financially.

Architecture and Design Scotland were engaged through its Design Forum process. The first version of the scheme it saw showed the extensions made of stone with an appearance that was minimalist, modern and classical. Through discussion with A+DS and following public consultation as a result of the PAN process, the design evolved to better alleviate the effects of the size of the building.

As is set out in sections 3.3 b), c), d), e) and f), the resulting form has significant adverse impacts on the built heritage and landscape of the city. The proposed design endeavours to mitigate these effects. There are two main aspects to this mitigation.

Firstly, the stepping back of the extensions - to create the terraced effects - allows a little more of the landscape to be seen either side the Hamilton Building than would otherwise be seen if the extensions took a more traditional form whereby floors are positioned directly on top of one another.

Secondly, mitigation is achieved through the design of the extensions' facades. The use of the faceted rectangular shaped panels of pre-patinated copper, has a sculptural effect that is reminiscent of the nearby Salisbury Crags. The extensions are clearly modern in appearance, creating a striking contrast to the Hamilton Building and the nearby listed monuments and buildings. Like the Hamilton Building, natural light will highlight these in different ways throughout the day and seasons. This means that sometimes, the extensions will be more recessive in their appearance, and sometimes they will be more prominent. It will always be clear however, that these are buildings, and not part of the natural landscape.

A sample panel has been constructed on site. This shows the high quality of the proposal in respect of the proposed external material and its detailing. If Committee is minded to grant the application, a condition is recommended to secure this material.

This design approach is supported by A+DS. However, its reports are caveated with the following statement:

*A+DS did not review the suitability of the proposed use of the building nor policies related to the conservation, demolition and restorations proposed, nor the case for and quantum of enabling development justifiable in connection with restorations. The examination of these issues by other bodies is a pre-requisite to the consideration of the design appraisal below.*

The Edinburgh Urban Design Panel reviewed the proposals. While it welcomed *'the change in design approach towards a 'landscape based' form, materials and detailing, and the pulling back of the proposed new build from the main Hamilton building'*, it had *'significant concerns that the quantum of development proposed in order to achieve a "world class" hotel on the site cannot be delivered without exceptional and significant harm to the character and setting of this unique and nationally important historic building and landscape setting.'* While there has been some design refinement since the pre application stage when the Panel reviewed the proposals, the scheme remains more or less the same size and therefore it is reasonable to state that the Panel's comment still applies.

The architecture is clearly a sophisticated response to the site's sensitive context. While it does mitigate, as best it can, the visual impact of the quantity of development proposed, this mitigation is insufficient to overcome the significant adverse impacts that the building would have on the historic built and landscape environment. Put simply, too much building is proposed.

#### Soft and Hard landscape proposals

The proposals for the design of the softworks and plant choice are acceptable. Although the area occupied by the proposed buildings is greater than exists at present, the area of soft landscape at ground level is approximately the same. There is a significant increase in soft landscape at roof top level, which provides biodiversity benefit and water retention. The only area of public open space within the application site is the paved area, outside the proposed cafe, next to the entrance to Calton Hill.

There is a long term vision for the public realm, as well as more detailed proposals for the works proposed within the application site, which include works to the adjacent public road and footway. The hard landscaping design responds to the modern extensions proposed, but in the process damages the historic fabric (railings, boundary walls and pillars) that form part of the setting of the Royal High School. This is contrary to ECLP Des 5 and Des 3, which states that features worthy of retention should be incorporated into the design to enhance sense of place and ECLP Policy ENV 3, which protects the setting of Listed Buildings.

While the proposed high quality new hard landscape scheme proposed would be welcomed, the proposal does not comply with Policy Des 3 a) of the ECLP and policy Des 4 of the LDP in respect of its effect on setting. This is as a result of the loss of historic features.

## **h) Impact on trees and biodiversity**

Ecological matters are comprehensively dealt with in the Environmental Statement and mitigation is proposed. Mitigation relating to the erection of bird and bat boxes is proposed outwith the site. This is acceptable. Scottish Natural Heritage notes that as long as the sites with bat potential are re-checked prior to demolition, the proposal would not require a species licence.

There are 15 trees worthy of retention on the site (Category A and B in the tree survey). All but two of these trees are being removed to facilitate development. There are also 13 trees of lower quality that are also being removed, leaving three trees on site. Three scot's pine trees are being proposed in the planting plan as mitigation on Regent Road.

Currently the trees contribute to the designed semi-rural character of the hill and help provide a visual link between the upper and lower sections of the hill in city views, which adds to the understanding of the hill form. Their loss is contrary to ECLP policies ENV 12 (Trees) and Des 5 which looks to safeguard trees worthy of retention for incorporation into the design. The volume of tree planting currently on site is not being replaced in the proposals, as there is insufficient space to allow this to happen.

Seven trees adjacent to the site will also be affected due the proximity of the building line and the canopy will require cutting back before work commences. One tree requires over 40% of the canopy removed, four trees between 13-25% and two trees a smaller reduction of around 6%. This is a significant loss to the canopy, and, in order to balance the canopy, further pruning might be required. This raises the risk of mechanical failure and disease. The loss will reduce the screening effect of the trees in the summer to the east wing and to a lesser extent in the winter months. Some re-growth will occur, but this will not be in keeping with the original character of the tree. As the trees are part of the character of the Historic Garden and Designed Landscape, this loss of character is contrary to ECLP Policy Env 7. The requirement to remove sections of trees on adjacent land indicates that the proposals are too close to the boundary line and is contrary to ECLP Des 5 and the Edinburgh Design Guidance.

## **i) Impact on neighbouring amenities**

The proposed development faces on to the private gardens of the residential premises at Regent Terrace. Residential premises and student halls are also located to the south of the site on Calton Road. In terms of impact on residential amenity, noise, and potential light pollution, as well as daylight and privacy, need to be considered.

### Daylight, sunlight and privacy

With respect to daylight and sunlight, the supporting document states that the proposals have been designed to minimise the effects on daylight levels on neighbouring properties. The proposed eastern wing has been stepped to mitigate the effects in terms of loss of daylight and sunlight. This conclusion is accepted.

There are two windows on the gable end of the nearest dwelling house on Regent Terrace. Windows on side elevations are not generally given the same level of protection in terms of loss of daylight and or privacy, under the Edinburgh Design

Guidance. Nevertheless, the EIA states that no residential windows included in the assessment would be affected by a noticeable reduction in daylight, or sunlight availability as a result of the development. This conclusion is accepted.

The hotel bedroom windows on the elevation facing on to neighbouring gardens would be fitted with a mix of translucent and opaque glazing. It is accepted that this would safeguard against the loss of privacy at neighbouring properties.

The daylight, sunlight and privacy impacts are acceptable.

### Operational Noise

The proposed ballroom and public bar uses are the areas of the building where most noise emissions are likely to occur. The submitted noise impact assessment has addressed this issue and provides details on how the development will be designed to ensure that associated noise levels will not be audible within neighbouring residents.

The entertainment spaces would be enclosed within other rooms. The partitions to these rooms, along with other identified attenuation measures, would provide protection from noise disturbance to neighbouring properties. If Committee is minded to grant this application, the use of a suitable condition would ensure that the above measures are implemented, in accordance with the advice from Environmental Assessment.

Most of the building services will be at the basement plant room with several additional plant spaces along the lower ground floor. An external chillers compound is proposed at the east end of the building and potentially kitchen supply/extract plant on the roof of the existing school, on either side of the central roof dome. The noise study indicates that it will be possible to meet the required noise criteria of NR25 within the neighbouring residential properties allowing for their windows to be open. Full details of the proposed plant equipment are not available. However, should Committee be minded to approve this application, the use of a suitably worded condition would ensure that the relevant details are approved and implemented on site, to ensure that allowable noise limits (NR25) are achieved.

### Light Pollution

Neighbouring residential properties have raised concerns with possible light pollution from the proposed development. The applicant has highlighted that there will be only soft lighting located on the facades close to the residential properties. There may be some light spillage from the grounds already and the proposals would have a potentially lesser impact on residential amenity.

It should be noted that whilst proposals for lighting on a listed building require listed building consent for their fixture on buildings, the type and intensity of lighting is not controlled under planning legislation. Any nuisance caused by lighting intensity is instead controlled under the Environmental Protection Act.

### Public security

Police Scotland has advised that the hotel grounds should be illuminated to provide a uniform level of white light, for security reasons. This requirement would potentially affect the form of external lighting proposed and its impact on neighbouring properties, as well as potentially impacting on the character and setting of the listed building. If

Committee is minded to grant planning permission, an informative is recommended that would advise the applicant to liaise with Police Scotland regarding the lighting scheme.

#### **j) Impact on transport and road safety**

There is no provision for private parking on site, other than that in the rear courtyard for the use of disabled drivers. This level of provision accords with the Council's standards for this central area location, where minimal parking provision is encouraged. Cycle storage racks are proposed in the rear courtyard, with spaces for 16 bicycles.

The proposals for the public realm, to be carried out by the applicant, are generally acceptable, in terms of their compatibility with the Council's long term ambitions for a future family friendly cycle lane on Regent Road. However, the Transport team has advised that whilst the two way segregated cycle route shown on the applicant's 'wider public realm plan' is feasible, this illustration does not commit the Council to provide the cycleway in this manner.

The proposed formation of three new pedestrian crossing points on Regent Road, one of which is located close to the front entrance to the hotel building, and the removal of the barrier on the central reservation would improve pedestrian safety and encourage movement through this area. However, the full details of these proposals would require to be submitted for approval at the Traffic Regulation Order stage.

There are no objections to the removal of all parking spaces on the site frontage on the north side of Regent Road, in order to facilitate access arrangements for the proposed hotel, including the proposed drop facilities on Calton Road. The Transport team does not support the removal of the spaces on the south side of this road, as indicated on the public realm drawing. However, it has advised that the removal of parking spaces on the south side may be reconsidered at the time when the proposed cycle route is due for implementation.

The location and design of the proposed service access at the western end of Regent Terrace, towards the east of the application site, is acceptable to the Transport team, subject to the approval of the details under the relevant Traffic Regulation Order. The promotion of this Order would require to be funded by the developer. The applicant has advised that a service management plan will be prepared by the operator which will detail how the deliveries will function. If Committee is minded to grant this application, an informative may be added regarding the provision of the relevant service plan.

Full details of the proposed public realm and junction design changes, including detailed design, materials and lighting and drainage would require to be submitted for approval, prior to the implementation of works on site. The use of an informative, requiring the submission and approval of such details under the relevant Traffic Regulation Order is recommended if Committee is minded to grant this application.

The proposals for improvements to the public realm at the entrance to the public park on Calton Hill, which include the widening of the public footway with sandstone flagstones and the provision of new granite setts to match the existing, are to be welcomed, as they would improve the public realm and access provision to this important area of public open space, to the benefit of both tourists and the general public.

The proposed formation of a new pedestrian access on to Calton Hill to the rear of the site would improve site permeability and access provision to this important area of public open space. However, this access provision would not be fully inclusive, owing to the need for steps at this steep part of the site. Police Scotland has recommended that this access is either removed from the plans, or made into a controlled access, with restricted access only to authorised persons, including guests. If Committee is minded to grant this application, it is recommended that an informative is added, advising the applicant of these concerns.

The proposals for the public realm include the provision of wider footways at key access points (entrance to Calton Hill and at junction with Regent Road) and the provision of additional pedestrian crossing points. The proposals raise no significant concerns in terms of impacts on road safety, traffic management or vehicle parking provision, and are in compliance with ECLP policies Des7 as well as Designing for Streets Guidance.

If Committee is minded to grant, conditions are recommended relating to approval of proposed surface materials and detailed design. The applicant would also be required to enter into a Section 75 agreement, relating to the implementation of the proposed works to the public realm, and for the payment for promotion of Traffic Regulation Orders required for the proposed works to the public road. To meet the objective of the Princes Street Site 10 to enhance movement and access to and from the former Royal High School, improvements to the paths between Calton Road and Regent Road are sought. An informative would also be recommended to secure a contribution towards pedestrian improvements in the vicinity of the development. Improvements to paths between Calton Road and Regent Road, have not been costed, however in relation to Jacob's Ladder, these could cost in the region on £500,000 were a complete renewal project undertaken. A contribution of £50,000 would be sought which would be used towards such a project or public realm improvements within the vicinity of the site.

### **k) Impact on archaeology**

In order to safeguard the archaeological interests of the existing buildings and the earth below, the use of a condition is recommended, if Committee is minded to grant the application, It would require a site survey to be undertaken to secure the recording of historic buildings and excavations, before development commences on site. Given the significance of the history of the Royal High School to Edinburgh, and the resulting level of public interest, it is also recommended that the applicant be required to undertake a programme of public engagement, in coordination with this programme. If Committee is minded to grant the application, an informative would be recommended in this regard.

## **l) Impact on geology**

Calton Hill is part of a site of special scientific interest (SSSI) of the Arthur's Seat Volcano. This is a national designation and is a result of its geological importance. The application site is outwith the area covered by the designation and so there is no direct physical impact upon it. As a result, the proposal complies with Policy Env 14 of ECLP - Sites of National Importance. However, the EIA refers to the remaining risk of indirect impacts to the SSSI, via rock removal. In order to address such potential risks. It recommends 'a rock pre-treatment options assessment' to decide the best method to minimise risk. Scottish Natural Heritage strongly supports this recommendation to ensure that rock excavation is carried out with the least risk to wider rock stability and the SSSI interests.

If Committee is minded to grant the application, the use of a condition is recommended to ensure that the above mentioned assessment is carried out prior to the commencement of development and the results used to inform the selected methodology.

## **m) Economic impacts**

### Regeneration and Employment Opportunities

The applicant has submitted a range of background documents, containing economic/ financial appraisals, in support of this application. Together, these reports are intended to address the economic case behind situating the hotel in this location, and the extent of demolitions and the scale and massing of the proposed new build required. Economic Development has advised on the benefits to the local and city wide economy resulting from the siting of the hotel at this location.

The site is one of the Edinburgh 12 Strategic Gap sites in the city centre, identified by the Council in 2013, in view of their potential to deliver the greatest economic impact within the next five years. Collectively these sites have been estimated to support approximately 19,000 full time jobs.

Edinburgh City Local Plan recognises the importance of tourism to the City's economy and states that tourism is the third largest source of employment. The supporting documents estimate that the proposed hotel would support approximately 260 jobs at the hotel itself. However, it is noted that the delivery of the benefits to the local community would depend on the extent to which the proposed hotel operator would create training opportunities for local residents. Further employment opportunities, in local businesses supporting the proposed hotel are also likely to arise indirectly from the proposed development.

The Princes Street Development Brief Block 10 states that the block in which the site is located has the potential to deliver a cultural and visitor designation and would serve as key link between the existing and new developments in the Old Town and St James Centre. The Brief notes the lack of retail and leisure uses in this area and related footfall. The provision of public cafes and bars and restaurants at the hotel would help to encourage footfall and generate further expenditure in this area of city, to the benefit of the city's economy.

The development of a luxury hotel would assist in addressing the demand for high quality hotels accommodation in Edinburgh, as identified in the 2012 Tourist Accommodation Audit. It is noted that four new luxury hotels are currently in the pipeline in Edinburgh, but the Audit reports that there is still an estimated shortfall of rooms required by the target date of 2021. Whilst the planning system can have no remit over the type of hotel use, it is clear that a hotel of the very highest quality is proposed. The quality provided is likely to attract high spending tourists and business people. This is a sector of the hotel market that Edinburgh does not cater for adequately. The income derived from the tourist industry makes a strong contribution to the city's economy.

It is accepted that there would be significant benefits to the economy and to tourism resulting from the provision of the proposed hotel at this landmark location within the city. As a result, the development could make a very positive contribution to Edinburgh's economy. However, it is also recognised that the city's historic and cultural heritage and landscaped setting are key attributes which attract tourists to our city. The damage caused to the city's heritage and landscaped setting, as a result of the proposed development at this highly prominent site could potentially have an adverse impact, in the longer term, on the city's economy. It is not possible to quantify this impact. There would undoubtedly be immediate positive impacts from allowing the development. The proposal is not considered to have any adverse economic impacts general terms and would bring economic benefit to the city.

In summary, the development could make a very positive contribution to Edinburgh's economy.

#### **n) Cultural impacts**

Concerns have been raised in representations that the proposed use as a 'luxury hotel' would not allow sufficient public access to this building, to the benefit of the wider community and would also represent a lost opportunity to provide a cultural venue.

The submitted Arts and Culture Strategy details the applicant and hotel operator's commitment towards delivering an arts and culture strategy by providing a suitable programme of events, in liaison with local arts organisations, as an integral part of the hotel operator's ethos. It is stated that large areas of the ground floor and lower ground floor areas within the main Hamilton building would be open to the public and made available for the display of art works and the holding of relevant performances.

It is recognised such a commitment, as demonstrated in the submitted sample of events taking place at the Rosewood London Hotel, would provide an opportunity to allow the public access to this listed building, and to make potential contribution towards the local arts programme, including festival events. However, the delivery of such a programme cannot be guaranteed through the planning process, partly as any relevant planning permission could not be restricted to specifically one hotel operator.

Similarly, in relation to public access, the cafe, bar and restaurant areas are likely to be retained in public use, as per the description of proposed development. However, the level of public access within the remainder of the hotel buildings cannot be controlled under the relevant planning permission for hotel use, nor can the hotel operator's policy in terms of allowing access rights to all sections of the community, which may be restricted by ability to pay.

Notwithstanding the limitations of the planning system in being able to secure cultural uses and public access, the development, as proposed, would make a positive contribution to the culture of the city. It is consistent with policies Ret 6 of the ECLP and Ret 5 of the LDP.

### **o) Other material considerations**

#### Air Quality

The application site is located adjacent to the City Centre Air Quality Management Area, where air quality has been affected by excessive traffic emissions. Any cumulative adverse impact on air quality, such as through the generation of increased vehicle emissions, requires assessment under the terms of ECLP Env 14 (Air Quality). The provision of no private parking spaces on site complies with the Council's parking standards for this city centre location, where minimal provision is encouraged, partially to reduce traffic emissions. However, it is noted that pick up and drop off facilities are proposed both inside and on the frontage of the site.

Environmental Assessment has advised that vehicle charge point should be provided at the taxi lay-by to encourage the use of sustainable transport methods. If Committee is minded to grant permission, an informative would be applied recommending this. The requirement for contributions towards the Edinburgh Tram Network would also assist in encouraging the use of sustainable transport modes, thus helping to reduce pollution from private car use.

The proposals include the provision of gas powered energy plant which has the potential to impact adversely on local air quality owing to increased levels of nitrogen dioxide emissions. However, the applicant has confirmed it will utilise secondary abatement technology, which Environmental Assessment has advised should be a condition of any relevant planning consent.

The development is acceptable in relation to Air Quality and Policy Env 18 of the ECLP and Policy Env 22 of the LDP.

#### Flood Prevention

The drainage proposals include the use of the combined sewer for discharge of excess surface water. Flood risk and surface water management plans have been submitted with the application. The finalised surface water management plan includes additional measures for Sustainable Urban Drainage systems (SUDS), in the form of underground storage tanks, as well as green roofs, to assist in the reduction of surface water run-off.

Scottish Environmental Protection Agency has no objections to the application in terms of drainage issues and has advised that the proposals are acceptable, but have noted the requirement for SUDS. Scottish Water has been consulted but has not responded.

The proposed drainage information is acceptable and the proposals do not give cause for concerns in terms of causing any increased risk of flooding in the area.

#### Railway Issues

The application site is located within 10 metres of the tunnel of the main Edinburgh to London railway line. Network Rail has been consulted on the proposals which include rock excavation in order to create new accommodation at basement level.

Network Rail has examined the proposed methodology which includes the use of chemical extraction and, or vibration techniques. It has no objections to the proposals, subject to reaching an agreement with the applicant on a suitable programme for extraction, in order to avoid disruptions to the railway services. If Committee is minded to grant permission, a suitable informative would be added regarding this requirement. Other issues concerning the impact of the proposals on site stability would be dealt with under the Building Regulations.

### Community Safety

The provision of an active frontage at the western end of the site where the proposed café is proposed, accords with the provisions of Edinburgh Design Guidance, as the resulting passive surveillance would benefit public safety at this key point at the entrance to Calton Hill. Police Scotland has noted the wider benefits to community safety resulting from the overlooking of Calton Hill, as a result of the occupation of this building.

The recommendations of Police Scotland regarding the uniform illumination of the application site, in the interests of public safety, would have to be balanced against the impact on the setting of this listed building at this key location within the World Heritage Site and taken into account in the finalised proposals for the lighting strategy. Any resulting impacts on public amenity would be dealt with by under the Environmental Protection Act.

The concerns in terms of security relating to the provision of an additional pedestrian access at the rear of the site to Calton Hill, as highlighted by Police Scotland, also require to be taken into account in the consideration of the proposals. If approved it is recommended that an informative is added to notify the applicant of Police Scotland's recommendations regarding making this access secure.

Bringing the building back into use will improve community safety.

### **p) Infrastructure requirements**

To mitigate the impacts of the development, if Committee is minded to grant this application the applicant would be required to enter into a suitable legal agreement to secure the following contributions:

- a. the sum of £224,600 to the Edinburgh Tram in line with Council policy (based on 147 room hotel in Zone 3);
- b. the sum of £2,000 to promote a suitable order to re-determine sections of footway and carriageway as appropriate;
- c. the sum of £2,000 to promote a suitable order to amend the controlled parking zone order, as it applies to Regent Road; and
- d. the sum of £50,000 towards improvements to Jacob's Ladder or other public realm within the vicinity of the site.

### **q) The Environmental Statement**

An environmental statement has been provided. This provides an assessment of the impact of the development in environmental terms. This report provides an assessment of the proposal in planning terms, however for the purposes of completeness it is appropriate to consider the conclusions of the Environmental Statement. It considers that the proposed development would result in a reversible, but difficult to remove, alteration. This conclusion is not accepted. There would be a permanent and irreversible change. This means that there would more significant impacts than are reported in the Statement.

In terms of the townscape assessment the baseline information does not fully reflect the complexities of the site. The Royal High School is a building, a monument and a cultural symbol which has intentional space around the building to create a landscape setting. Alteration of baseline characteristics that have specific historical and cultural significance is considered adverse.

In terms of the visual assessment, the conclusions are not all accepted. This is particularly the case where the development introduces a new focal point to some views that damages the baseline visual characteristics see 3.3d. The image quality has been questioned by objectors. Whilst this concern is acknowledged there is sufficient information in the Landscape and Visual Impact Assessment to allow a balanced judgement. In relation to the Historic Assessment, the limited categories of significance in the methodology are not accepted. Also within the section on setting, the description of the character, in terms of the unique picturesque landscape, has been insufficiently reported in this section. The baseline information therefore does not reflect the complexities of the site and the assessment is not accepted.

In summary many of the conclusions of the Environmental Statement are not accepted. In particular, the assertion that the extensions will have an acceptable impact on the environment is refuted.

**r) Sustainability**

The applicant has submitted a sustainability statement in support of this application.

<b>Essential Criteria</b>	<b>Available</b>	<b>Achieved</b>
Section 1: Energy Needs	20	20
Section 2: Water Conservation	10	10
Section 3: Surface Water run-off	10	10
Section 4: Recycling	10	10
Section 5: Materials	30	30
<b>Total Points</b>	<b>80</b>	<b>80</b>

Desirable Elements

In addition, the applicant has given a commitment towards the inclusion of additional sustainability measures, described as desirable elements. The additional measures include the installation of a combined heat and power plant, with connection to allow excess energy generated to supply the national grid, achieving a BREEAM score of 'very good'.

Other measures are passive solar gain, support of sustainable transport modes, and incorporation of green roofs to allow for increased surface run off measures.

The proposal meets the requirements of Policy Des 6 of the ECLP and Policy Des 6 of LDP.

### **s) Equalities and rights**

The development would improve the accessibility of the building. Level access would be provided to it at the new main entrance and there would be lifts to allow access to its various levels.

The proposed public realm works would improve accessibility, including those with mobility issues, on Regent Road.

Impacts on equalities and rights are acceptable.

### **t) Representations**

#### Material Representations - Objections

##### *Use issues*

- Unsuitable use - addressed in section 3.3 (a) and it is found that the proposed use complies with development plan policy and is acceptable in principle.
- Other more appropriate use types - addressed in section 3.3(b) and it is found that the alternative uses have been considered and found to be less viable.
- Lack of demand/ oversupply of hotels - addressed in section 3.3(b) and it is found that there is a demand for this type of hotel at city centre locations.
- Other less sensitive sites available - addressed in section 3.3(b) and it is found that other city centre sites were considered and found unsuitable or unavailable.

##### *Cultural Issues*

- Exclusive nature of use type - addressed in section 3.3(n) and it is found that the applicant has indicated that a significant proportion of floor space will be open to the public, the extent of availability cannot be enforced in through the planning function.
- Limited cultural value - addressed in section 3.3(n) whilst the applicant has identified their commitment to implementing an arts and culture strategy at the hotel this would not be enforceable in planning terms.

##### *Economic issues*

- Job creation mainly low paid - addressed in section 3.3 (m) and it is found that no details have been provided regarding the likely level of pay of future employees, although this will partly be dependant on level of training given, which cannot be guaranteed through the planning system.
- Potential negative impact on tourism (due to loss of historic assets/ impact on landscape) - addressed in section 3.3(m) and it is found that this a potential future risk.
- Financial viability and profit versus safeguarding cultural heritage - addressed in section 3.3(b) and it is found that the damage to the cultural heritage is an overriding consideration.

### *Design and context*

- Design/scale/massing unsuitable - addressed in sections 3.3 (b), (c), (d), (e), (f), (g) and it is found that the design scale and massing of the proposed development is inappropriate at this location.
- Over-development of the site - addressed in section 3.3(b) and (g) and it is found that the quantum of development is excessive at this location.
- Inappropriate materials - addressed in section 3.3 (g) and it is found that the proposed materials are acceptable.
- Design Incompatible with site's setting - addressed in section 3.3 (g) and it is found that the proposed design is of a high quality, the extent of development on site is excessive.

### *Impact on setting/ key views*

- Threat to World Heritage Site - addressed in section 3.3(f) and it is found that the proposal would have an unacceptable impact on the World Heritage Site.
- Impact on townscape/ - addressed in section 3.3 (c) (e) and (f) and it is found that the proposals would have an unacceptable impact on key views of the townscape.
- Impact on key views / skyline - addressed in section 3.3 (e) and it is found that the proposals would have a detrimental impact on a number of important view points .

### *Impact on Listed Buildings/ conservation area*

- Impact on character of conservation areas - addressed in section 3.3 (c) - and it is found to be have an unacceptable impact.
- Impact of interventions on character and setting of listed buildings on site - addressed in section 3.3 (b) - and it is found to be have an unacceptable impact.
- Impact on character /setting due to demolition of listed buildings - addressed in section 3.3 (b) - and it is found to be have an unacceptable impact.
- Impact of proposed new wings on character/setting of listed buildings - addressed in section 3.3(b) - and it is found to have an unacceptable impact.
- Impact on setting of neighbouring listed buildings - addressed in section 3.3 (b) - and it is found to have an unacceptable impact.
- Impact on setting of listed monuments (Calton Hill) - addressed in section 3.3 (b) - and it is found to have an unacceptable impact.
- Loss of boundary features including railings - addressed in section 3.3 (b) - and found to be unacceptable.

### *Open space/ landscaping/ trees*

- Impact on landscape character - addressed in section 3.3 (d) - and it is found to have an unacceptable impact.
- Impact on setting of historic gardens/ designed landscapes - addressed in section 3.3 (d) - and it is found to have an unacceptable impact.
- Impact on public open space provision public open space - addressed in section 3.3 (g) - open space is found to be acceptable.
- Lack of proposed landscaping/ loss of existing landscaping - addressed in section 3.3 (d) - and it is found to have an unacceptable impact.
- Impact on neighbouring trees - addressed in section 3.3 (h) - and it is found to have an unacceptable impact.

- Lack of access to open space - addressed in section 3.3 (j) - and it is found to have an acceptable impact.
- Lack of definition between public and private spaces - addressed in section 3.3 (g) - open space assessed as acceptable.

#### *Amenity/traffic*

- Impact of public house/ restaurant uses on neighbouring character/amenity - addressed in section 3.3 (i) - found to be acceptable subject to condition.
- Concerns regarding increased noise activity - addressed in section 3.3 (i) - found to be acceptable subject to condition.
- Overshadowing and loss of sunlight to houses on Regent Terrace - addressed in section 3.3 (i) - found to be acceptable.
- Overlooking and privacy concerns (on 1 Regent Terrace) - addressed in section 3.3 (i) - found to be acceptable.
- Impact of potential increase in traffic generation - addressed in section 3.3 (j) - found to be acceptable.
- Impact owing to increased demand for parking - addressed in section 3.3 (j) - found to be acceptable.
- Concerns regarding safety of proposed delivery access - addressed in section 3.3 (j) - found to be acceptable.

#### Comments in support

- Increased range of tourist / business accommodation - addressed in section 3.3 (m) - the benefits to tourism and business are accepted.
- Economic benefits for city - addressed in section 3.3 (m) - these are accepted.
- Job creation - addressed in section 3.3 (m) - there would be significant job creation.
- Encouraging increased local expenditure/ economic activity - addressed in section 3.3 (m) - there would be increased expenditure and economic activity.
- Positive impact on anti-social behaviour on Calton Hill (due to passive surveillance) - addressed in section 3.3 (o) - this is accepted.
- Return of listed school building to sustainable use - addressed in section 3.3 (a) and (m) - this would be a benefit.
- Provision for future upkeep/ maintenance of Listed building - addressed in section 3.3 (m) and it is found that the proposals are likely to provide a sustainable future use which would include site's maintenance.
- Sensitive design of new build/interventions - addressed in section 3.3 (g) - the design of the elevations is accepted however the scale of the proposed extensions is not.
- Good quality/ responsive design of new build - addressed in section 3.3 (g) - the design of the elevations is accepted however the scale of the proposed extensions is not.
- Positive impact on setting of listed building - addressed in section 3.3 (b) and it is found that the proposed development would have a significantly detrimental impact on the setting of the category a listed building.
- Compatible with site's setting - addressed in section 3.3 (b) (c) (d) (e) (f) (g) and it is found that the proposed development would have a significantly detrimental impact on the site's setting.

### Non-material Issues raised

- Quality of accommodation offered by proposed luxury hotel operator (the quality/and or brand of the proposed hotel cannot be controlled under planning legislation and any relevant consent may be taken up by other operators).
- Track record of developer (this is not a relevant consideration as planning permission goes with the land, not the applicant and may be taken up by another developer).
- Great project which bring great things for Edinburgh - no specific planning reasons given.
- Wide reaching benefits - no specific planning reasons given.
- Better use than as a school - with no planning related reasons given.
- Use as school would be better - no relevant planning reasons given.
- The Council has already accepted the bid for the site - issues relating to the land transfer are dealt with through separate Council functions.
- Concerns regarding alleged neglect of building by Council - this is not a planning issue.
- Security implications with the neighbouring US Consul , whilst not directly relevant to this application, it is noted that the applicant has liaised with Police Scotland to ensure that security risks are addressed in detailed design scheme.

### *Noise and Vibration - Construction phase*

The application site is located on hard bedrock, therefore there are potential impacts of noise and vibration arising during excavation and breaking. The submitted Noise and Vibration Study in the Environmental Impact Assessment (EIA), examines the impact of the noise and vibration resulting from the proposed demolition, excavations and construction operations. This is a matter of concern which has been raised by neighbouring objectors. The applicant has identified a range of measures to control site specific demolition and construction noise and vibration, including restricted working hours and measures to reduce noise and vibration at source. Whilst such controls are not regulated through the planning function, these are regulated under the Control of Pollution Act 1974 which gives environmental health officers the powers to control noise and vibration pollution from construction sites.

With regards to rock excavation, Environmental Assessment is satisfied that the range of methods identified for use, can be regulated under the Control of Pollution Act 1974, to ensure disturbance is minimised. Environmental Assessment is satisfied that these techniques, which the applicant advises will all conform to British Standards, are unlikely to breach the relevant Standards.

The findings of the EIA demonstrate that with respect to demolition and construction activities, un-mitigated daytime noise levels would result in potential significant effects at the closest residential properties, on Regent Terrace. However, the risk of such adverse impacts would be restricted to critical phases of works, for short periods of time during the day time and the study therefore identifies the overall impact as not significant.

The EIA has also assessed the likely impacts during construction phase caused by the increase of construction Heavy Good Vehicles in the nearby road network. Such sources of disturbance are also controlled under the Control of Pollution Act. However, Environmental Assessment is satisfied that the impacts identified in the study findings are not significant.

### *Observations concerning the selection of the hotel proposal through the Council's tendering process and level of transparency regarding this exercise*

The current proposal was identified through a European wide tendering event which the Council ran for this property. This competition was launched in compliance with the EU procurement competitive dialogue process, to attract ideas about the use, design and funding and commercial potential of the redevelopment opportunity, as confirmed by CEC Business Partnerships team in their submitted statement. The current applicant was identified as the strongest contender out of 54 entrants. The contract notice was published in the Official journal of the European Union on 4 June 2009.

#### Community Council

The New Town and Broughton Community Council (NTBCC) objects to the development on the following grounds:

- Proposed Demolition of Buildings - while potentially supporting the demolition of the single storey luncheon hall and classroom it is not supportive of the demolition of the lodge building - assessed in section 3.3b).
- Adverse impact on setting of listed building- assessed in section 3.3b) - and it is found that there is an unacceptable impact.
- Adverse impact on listed building as a result of alterations - assessed in section 3.3 b) - and it is found that there is an unacceptable impact.
- Scale of development - Western extension is far too prominent - assessed in sections 3.3 b), c), d), e) and f) - and it is found that there is are unacceptable impacts.
- Economic benefits not sufficient to justify the proposal - assessed in sections 3.3 b) and m) - it is found that there are significant economic benefits, however these are not outweighed by the harm caused by the proposals.
- Public Access - Do not consider a hotel use a public building - use assessed in section 3.3 a) and n) - and it is found that public access would be acceptable.
- Sustainable long term use - assessed in section 3.3 b) - and it is found that there would be a benefit in bringing the building back into use.

The NTBCC are supportive of bringing the building back into use.

#### **Conclusion**

The proposed change of use, alterations and extension of the Royal High School to create a luxury hotel would assist in addressing the demand for high quality hotels in Edinburgh. While planning can have no control over the type of hotel use, it is clear that a hotel of the very highest quality is proposed. There would be significant benefits to the city's economy and tourism resulting from this type of hotel. The existing building is not being used at present and is on the Buildings at Risk Register. The proposal would bring the former Royal High School back into sustainable long term use.

In relation to a number of aspects, such as neighbouring amenity, transport, archaeology, geology, culture, environmental health and infrastructure, the development is acceptable or its impacts can be successfully mitigated with the use of planning conditions or legal agreements.

The site contains a number of buildings that fall under a category A listing, the most important of which is the original building known as the Hamilton Building. The site sits within a dynamic urban landscape. It is highly sensitive, being highly prominent in the Edinburgh World Heritage Site, New Town Conservation area and the the New Town Gardens Inventory Gardens and Designed Landscape. It is adjacent to the Site of Special Scientific Interest on Calton Hill. The Hill contains a series of monuments and buildings that are also category A listed. The impacts of the extensions and alterations to the building therefore need careful consideration in order to determine whether any harm these may cause would outweigh the benefit of bringing building into use.

The architectural appearance, of the proposed new buildings echoes the form of the nearby Crags. They are clearly modern additions, providing a striking contrast to the Hamilton Building and the nearby listed monuments and buildings. The materials and detailing would ensure a high quality elevation design. In relation to these aspects, the architecture proposed is a sophisticated response to the site's sensitive context. While the architectural design, through the elevational design and the stepped form, does mitigate, to some degree, the effects of the size of the extensions, the proposal would have a significant adverse impact on the character and setting of listed buildings, the character of the Conservation Area and the OUV of the World Heritage Site. The proposed does not meet the requirements of Policy Des 3 a) of the ECLP or Policy Des 4 of the LDP.

The intrusion into the landscape space that can be seen below and alongside the listed monuments and buildings on Calton Hill would erode their setting. The proposal does not comply with Policies Env 3 and Env 4 of the Edinburgh City Local Plan (ECLP), Policies Env 3 and 4 of the Second Proposed Edinburgh Local Development Plan (LDP) or the Scottish Historic Environment Policy (SHEP).

In respect of SHEP it is necessary to consider whether the proposed development is acceptable in order to determine whether demolition can be supported in this instance. Due to the adverse impacts of the proposed development, the demolition of two listed buildings within the site (the gymnasium building and the lodge) cannot be justified. The proposal does not comply with Policy Env 2 of the ECLP, Policy Env 2 of the LDP or SHEP.

In addition, the proposal's effects are detrimental to the character of the New Town Conservation Area and to the Outstanding Universal Value (OUV) of the Edinburgh World Heritage Site. The proposal does therefore not comply with Policies Env 1 and Env 5 of the ECLP and Env 1 and Env 6 of the LDP.

While in general the development would accord with principles on accessibility and would have an economic benefit, these benefits are not outweighed by the harm to the historic environment. As such, the development is not sustainable development as defined by Scottish Planning Policy.

The development does not comply with the Princes Street Block 10 Development Brief, due to the impact on the setting of the Royal High School.

The benefits to the City's economy and to tourism through bringing an at risk building back into a sustainable long term use are not outweighed by the very significant harm to built heritage and landscape of the city. In coming to this conclusion, regard has been had to the exceptional architectural and historic interest of the Royal High School and the quality of its surrounding environment. The development would cause permanent and irreversible damage. The adverse impacts on the character and setting of listed buildings, the New Town Conservation Area, the designed landscape of Calton Hill and the OUV of the World Heritage site would not be mitigated by the sophisticated design of the proposed extensions. Put simply, too much building is being proposed for this highly sensitive site.

It is recommended that this application be Refused for the reasons below.

### **3.4 Conditions/reasons/informatives**

#### **Conditions:-**

#### **Reason for Refusal:-**

1. The proposal is contrary to Scottish Planning Policy relating to sustainable development, as it fails to adequately protect or enhance access to cultural heritage, including the historic environment, owing to the detrimental impact caused to the character and setting of the category A listed, principal school building, and to the character and appearance of both the Old and New Towns Conservation Areas, resulting from the excessive height, scale and massing of the proposed extensions at this highly prominent and sensitive site within the Old and New Towns of Edinburgh World Heritage Site.
2. The development is contrary to policy Env 1 of both the Edinburgh City Local Plan and the Second Proposed Edinburgh City Local Development Plan, in respect of the World Heritage Site, as it would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh as a World Heritage Site, which in relation to the application site comprise the outstanding set-piece of neo-classical architecture, the topography, the townscape and juxtaposition of Old and New Towns; and as a result would have a detrimental impact on the Site's Outstanding Universal Value.
3. The proposal is contrary to Edinburgh City Local Plan, Policy Env 2 and policy Env 2 of the Second Proposed Edinburgh City Local Development Plan, in respect of Listed Buildings - Demolition as the buildings remain of architectural and historic importance and the merits of the proposed replacement buildings and the public benefits to be derived from the development would not outweigh the loss of the buildings to be demolished.
4. The proposal is contrary to Edinburgh City Local Plan Policy Env 3 and Env 3 of the Second Proposed Edinburgh City Local Development Plan, in respect of Listed Buildings - Setting, as the proposed extensions, which owing to their excessive height, scale and massing are visually dominant and detrimental to the character and appearance of the category 'A' listed, principal school building and detract from its setting.

5. The proposal is contrary to Edinburgh City Local Plan Policy Env 4 and Env 4 of the Second Proposed Edinburgh City Local Development Plan, in respect of Listed Buildings - Alterations and Extensions, as the proposed extensions which are visually dominant in relation to the category 'A' listed, principal school building, owing to their excessive height scale and massing, are incompatible with the character of the existing building and diminish its special interest.

6. The proposal is contrary to Edinburgh City Local Plan Policy Env 7, and Policy 7 of the Second Proposed Edinburgh City Local Development Plan, in respect of Historic Gardens and Designed Landscapes, as the proposed extensions by reason of their inappropriate height, scale and massing at this highly prominent and sensitive site on Calton Hill would be detrimental to the character of Calton Hill which is part of the Inventory Gardens and Designed Landscapes 'The New Town Gardens' and would have an adverse impact on views to, from and within this Inventory listed site.

7. The proposal is contrary to Edinburgh City Local Plan Policy Env 11 in respect of Landscape Quality, as it has an adverse impact on the topographical and landscape feature of Calton Hill and views thereof, as a result of changes to the balance between the semi-natural hillside and the built features of the hill, as well as the appreciation of the profile of this prominent landscape formation.

8. The proposal is contrary to Edinburgh City Local Plan Policy Des 1 and Des 1 of the Second Proposed Edinburgh City Local Development Plan, in respect of Design Quality and Context, owing to the excessive height scale and massing of the proposed extensions and the failure of their design to draw upon the positive characteristics of the surrounding area, or to reinforce the existing sense of place at this highly sensitive and prominent location, within the curtilage of the Category 'A' listed building, in the New Town Conservation Area and World Heritage Site.

9. The proposal is contrary to policy Des 3 of both the Edinburgh City Local Plan and Des 4 of the Second Proposed Edinburgh City Local Development Plan, in respect of Development Design, as It would fail to have a positive impact on its setting, owing to the inappropriate height scale and massing of the proposed extensions, which are visually dominant and have a detrimental impact on the wider townscape, which includes the Old and New Town Conservation Areas and views thereof.

10. The proposal is contrary to Edinburgh City Local Plan Policy Des 10 and policy Des11 of the Second Proposed Edinburgh City Local Development Plan, in respect of Tall Buildings, as the proposed extensions which rise above the prevailing building height in the surrounding area, fail to enhance the skyline and would have an adverse impact on important views of the category 'A' listed, principal school building at this site, which is a key landmark, as well as impacting adversely on views of the landscape on Calton Hill and the listed monuments on this hill.

11. The proposal is contrary to policy Env 11 Second Proposed Edinburgh City Local Development Plan in respect of Special Landscape Areas, as it would have a significantly adverse impact on the special character and qualities of the Candidate Special Landscape Area at Calton Hill and views thereof, as a result of changes to the balance between the semi-natural hillside and the built features of the hill, as well as the appreciation of the profile of this prominent landscape formation.

## **Financial impact**

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### **4.1 The financial impact has been assessed as follows:**

In relation to the planning application, if Committee is minded to grant planning permission, a number of developer contributions would be necessary to mitigate the impacts of the development.

While not a material planning consideration, it should be noted that the Council is landowner of the Royal High School buildings. In relation to this, the development has been reported to the following committees:

- Former Royal High School (New Parliament House), Finance and Resources Committee, 31 March 2009;
- Former Royal High School, Edinburgh, Finance and Resources Committee, 16 March 2010;
- Former Royal High School Buildings and Site (New Parliament House), Finance and Resources Committee, 1 November 2011; and,
- Former Royal High School, Regent Road: Update on Proposed Disposal, Economy Committee, 16 December 2013 (B Agenda).\*

\*this report was referred to the Finance & Resources Committee for ratification on 16 January 2014 as as a B Agenda report

Loss of on street car parking spaces would be a matter for the Transport and Environment Committee. There would be a loss of revenue as a result of the loss of on street car parking.

## **Risk, Policy, compliance and governance impact**

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5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

## **Equalities impact**

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### **6.1 The equalities impact has been assessed as follows:**

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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### **7.1 The sustainability impact has been assessed as follows:**

This application meets the sustainability requirements of the Edinburgh Design Guidance.

## Consultation and engagement

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### 8.1 Pre-Application Process

A notice of a proposed application was submitted for planning permission for the change of use, alterations to and restoration of principal former High School building and Pavillions , demolition of ancillary buildings, including former gymnasium and gatehouse, new build development, new /improved pedestrian and vehicle access, landscaping, parking and public realm works to create a world class hotel of international standing. (approved 3 February 2015) (ref; 15/00223/PAN).

A pre-application report on the proposals was reported to the Development Management Sub Committee on 25 February 2015.

The proposals were the subject of discussion at a series of three workshopsheld at Architecture and Design Scotland, between February and May 2015. The comments from Architecture and Design Scotland, from its workshop on x May 2015 are included in the consultation section.

The proposals were presented to the Edinburgh Design Panel on 13 May 2015. The Panel's response is included in the consultation section,

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

The application was advertised on 11 September 2015.

The online system records 2179 entries, however some of these are duplicates whereby the same comment has been made by the same person more than once. If these duplicates are removed these then there is a total of 1618 comments made by individuals. Of these 278 are in support of the application and 1338 have objected. There are two representations that do not clearly support or object to the proposal.

The 278 representations in support of the application include representations from the Scottish Property Federation, Scottish Development International and Edinburgh Business Forum, Napier University and Edinburgh Airport.

The 1338 representations in objection to the application include representations from Councillor Doran, Councillor Rankin, Deidre Brock MP, Sarah Boyak MSP, Malcolm Chisholm MSP, Alison Johnstone MSP, Jean Urquhart MSP, Architectural Heritage Society of Scotland, Lord Cockburn Association, Scotland's Gardens and Landscape Heritage. SAVE Britain's Heritage, Europa Nostra (European Heritage Organisation) (of which the Council, and the Edinburgh World Heritage Trust are members), ICOMOS (International Council on Monuments and Sites), the Royal High School Preservation Trust, Scottish Civic Trust, Fairmilehead Community Council and the New Town and Broughton Community Council (which was also a consultee), Regent, Royal, Carlton Terraces and Mews Association.

A public consultation exercise conducted by an independent research consultancy, on behalf of the applicant, has also been undertaken during the period from 4 September to 18 September 2015, which coincided with the period for the receipt of representations on the planning application.

The consultation exercise carried out by the applicant at the application stage holds no status in the statutory planning consultation process. However, the report : 'Summary of Public Consultation Process and Results' has been submitted as a supporting document and is available to view on the Planning and Building Standards online Services. This report provides details behind the methodology used in the consultation process and an analysis of the feedback given. The methodology used took the form of on-street interviews being conducted across the city, with 'measures taken to ensure that a suitably robust and demographically representative' sample is provided.

Participants, who were divided into two categories, residents and visitors, were asked on a scale of one to ten: a) how much they were in support of the proposed hotel use; b) how much they supported the design of the development. The mean and median scores for the total number of participants to the question regarding the proposed hotel use were 8 out of 10, while the mode result was 10. The mean and median scores for the question on the design were 7.5 and 8 respectively, while the mode score was also 10.

It should be noted that no names or addresses of participants were provide in the submitted summary and results of this consultation process.

The results of a further consultation exercise conducted on behalf of the applicant, during October and November 2015 were submitted by the applicant on 1 December 2015. This information, which also holds no status in the statutory planning consultation process and was received outwith the statutory consultation period, is available to view on the Planning and Building Standards Online Services.

## **Background reading/external references**

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- To view details of the application go to
- [Planning and Building Standards online services](#)
- [Edinburgh City Local Plan and Rural West Edinburgh Local Plan](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development  
Plan Provision**

Within the adopted Edinburgh City Local Plan (ECLP) and the Second Proposed Edinburgh Local Development Plan (LDP), the site is located in the Central Area and in the New Town Conservation Area.

The Site is also included within the Old and New Towns of Edinburgh World Heritage Site.

The application site is included within the Princes Street Development Brief Block 10.

The land at Calton Hill immediately to the north of the application site is a designated Site of Special Scientific Interest (SSSI) which is also included within the Inventory of Designed Gardens and Historic Gardens and Special Landscape Area as designated in the Edinburgh City Local Plan and is proposed as a Candidate Special Landscape Area at Calton Hill in the Second Proposed Edinburgh Local Development Plan.

The Calton Hill Conservation Plan - adopted by the Council Executive at its meeting on 7 November 2000, underpins the Council policies for the use and regeneration of Calton Hill.

**Date registered**

3 September 2015

**Drawing numbers/Scheme**

1-13,14a,15-43,44a,45b,46a,47a,48b-58d,51-57,58a,59,60a,,  
61-65,66b,67-69,71a,72,73,74a,75,

**John Bury**

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## **Links - Policies**

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### **Relevant Policies:**

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

**Non-statutory guidelines - EDINBURGH STREET DESIGN GUIDANCE** - Edinburgh Street Design Guidance supports proposals that create better places through the delivery of vibrant, safe, attractive, effective and enjoyable streets in Edinburgh. It sets out the Council's expectations for the design of streets and public realm.

Second Proposed LDP Policy Del 1 (Developer Contributions) identifies the circumstances in which developer contributions will be required.

Second Proposed LDP Policy Del 2 (Retrospective Developer Contributions) identifies developer contributions will be sought for the tram network and other infrastructure identified in the Action Programme.

Second Proposed LDP Policy Del 3 (City Centre) sets criteria for assessing development in the city centre.

Second Proposed LDP Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

Second Proposed LDP Policy Des 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

Second Proposed LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

Second Proposed LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

Second Proposed LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

Second Proposed LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

Second Proposed LDP Policy Des 7 (Layout design) sets criteria for assessing layout design.

Second Proposed LDP Policy Des 8 (Public Realm and Landscape Design) sets criteria for assessing public realm and landscape design.

Second Proposed LDP Policy Des 11 (Tall Buildings - Skyline and Key Views) sets out criteria for assessing proposals for tall buildings.

Second Proposed LDP Policy Des 12 (Alterations and Extensions) sets criteria for assessing alterations and extensions to existing buildings.

Second Proposed LDP Policy Env 1 (Old and New Towns World Heritage Site) protects the quality of the World Heritage Site and its setting.

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

Second Proposed LDP Policy Env 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building will be permitted.

Second Proposed LDP Policy Env 4 (Listed Buildings - Alterations and Extensions) identifies the circumstances in which alterations and extensions to listed buildings will be permitted.

Second Proposed LDP Policy Env 5 (Conservation Areas - Demolition of Buildings) sets out criteria for assessing proposals involving the demolition of buildings within a conservation area.

Second Proposed LDP Policy Env 6 (Conservation Areas - Development) sets out criteria for assessing development in a conservation area.

Second Proposed LDP Policy Env 7 (Historic Gardens and Designed Landscapes) protects sites included in the national Inventory of Gardens and Designed Landscapes and other historic landscape features.

Second Proposed LDP 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.

Second Proposed LDP 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.

Second Proposed LDP Policy Env 11 (Special Landscape Areas) establishes a presumption against development that would adversely affect Special Landscape Areas.

Second Proposed LDP Policy Env 12 (Trees) sets out tree protection requirements for new development.

Second Proposed LDP Policy Env 14 (Sites of National Importance) identifies the circumstances in which development likely to affect Sites of National Importance will be permitted.

Second Proposed LDP Policy Env 15 (Sites of Local Importance) identifies the circumstances in which development likely to affect Sites of Local Importance will be permitted.

Second Proposed LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

Second Proposed LDP Policy Env 20 (Open Space in New Development) sets out requirements for the provision of open space in new development.

Second Proposed LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

Second Proposed LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Second Proposed LDP Policy Emp 10 (Hotel Development) sets criteria for assessing sites for hotel development.

Second Proposed LDP Policy Ret 6 (Entertainment and Leisure Developments - Preferred Locations) identifies the City Centre, at Leith and Granton Waterfront and town centres as the preferred locations for entertainment and leisure developments.

Second Proposed LDP Policy Ret 10 (Food and Drink Establishments) sets criteria for assessing the change of use to a food and drink establishment.

Second Proposed LDP Policy Tra 1 (Location of Major Travel Generating Development) supports major development in the City Centre and sets criteria for assessing major travel generating development elsewhere.

Second Proposed LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

Second Proposed LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

### **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.

**Non-statutory guidelines** 'GUIDANCE FOR BUSINESSES' provides guidance for proposals likely to be made on behalf of businesses. It includes food and drink uses, conversion to residential use, changing housing to commercial uses, altering shopfronts and signage and advertisements.

NSESBB **Non-statutory guidelines** Part B of 'The Edinburgh Standards for Sustainable Building' sets principles to assess the sustainability of major planning applications in Edinburgh

**Non-statutory guidelines** 'GUIDANCE FOR BUSINESSES' provides guidance for proposals likely to be made on behalf of businesses. It includes food and drink uses, conversion to residential use, changing housing to commercial uses, altering shopfronts and signage and advertisements.

**Non-statutory guidelines** on Developer Contributions and Affordable Housing gives guidance on the situations where developers will be required to provide affordable housing and/or will be required to make financial or other contributions towards the cost of, providing new facilities for schools, transport improvements, the tram project, public realm improvements and open space.

**Non-statutory guidelines** 'LISTED BUILDINGS AND CONSERVATION AREAS' provides guidance on repairing, altering or extending listed buildings and unlisted buildings in conservation areas.

**Non-statutory guidelines** on 'PARKING STANDARDS' set the requirements for parking provision in developments.

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

Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

Policy Des 3 (Development Design) sets criteria for assessing development design.

Policy Des 5 (External Spaces) sets criteria for assessing landscape design and external space elements of development.

Policy Des 6 (Sustainable Design & Construction) sets criteria for assessing the sustainable design and construction elements of development.

Policy Des 7 (New Pedestrian Routes in the City Centre) relates to the creation of new pedestrian routes in the City Centre.

Policy Des 10 (Tall Buildings) sets out criteria for assessing proposals for tall buildings.

Policy Des 11 (Alterations and Extensions) sets criteria for assessing alterations and extensions to existing buildings.

Policy Emp 5 (Hotel Development) sets criteria for assessing sites for hotel development.

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 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building 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 7 (Historic Gardens & Designed Landscapes) establishes a presumption against development that would be detrimental to Historic Gardens and Designed Landscapes.

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.

Policy Env 11 (Landscape Quality) establishes a presumption against development which would adversely affect important landscapes and landscape features.

Policy Env 12 (Trees) sets out tree protection requirements for new development.

Policy Env 14 (Sites of National Importance) identifies the circumstances in which development likely to affect Sites of National Importance will be permitted.

Policy Env 15 (Sites of Local Importance) identifies the circumstances in which development likely to affect Sites of Local Importance will be permitted.

Policy Env 16 (Species) sets out species protection requirements for new development.

Policy Env 17 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

Policy Env 18 (Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

Policy Os 3 (Open Space in New Development) sets out requirements for the provision of open space in new development.

Policy Ret 6 (Entertainment and Leisure Developments – Preferred Locations) identifies the Central Area, Leith & Granton Waterfronts and town centres as the preferred locations for entertainment and leisure developments.

Policy Ret 12 (Food and Drink Establishments) sets criteria for assessing the change of use to a food & drink establishment.

Policy Tra 1 (Major Travel Generating Development) supports major travel generating development in the Central Area, and sets criteria for assessing major travel generating development elsewhere.

Policy Tra 3m (Tram Contributions) requires contributions from developers towards the cost of tram works where the proposed tram network will help address the transport impacts of a development.

Policy Tra 5 (Private Cycle Parking) requires cycle parking provision in accordance with levels set out in supplementary guidance.

Policy Tra 6 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Policy Tra 2 (Planning Conditions and Agreements) requires, where appropriate, transport related conditions and/or planning agreements for major development likely to give rise to additional journeys.

**Relevant policies of the Proposed Local Development Plan.**

# Appendix 1

**Application for Planning Permission 15/03989/FUL  
At New Parliament House, 5 - 7 Regent Road, Edinburgh  
Change of use, alterations to and restoration of principal  
former Royal High School building and pavilions (original  
Thomas Hamilton-designed school buildings), demolition of  
ancillary buildings including the former Gymnasium Block  
and Lodge, new build development, new/improved vehicular,  
service and pedestrian accesses, landscaping, parking,  
public realm and other works to create a world class hotel of  
international standing with associated uses (including  
publicly accessible bars (public house) and restaurants  
(Class 3)).**

## Consultations

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### Historic Scotland

*The Council has consulted Historic Scotland because it believes that the development may affect:*

*Setting of Category A Listed buildings:*

- Old Royal High School
- St Andrew's House
- Regent Terrace
- Burns' Monument
- Monuments on Calton Hill

*Setting of Scheduled Monuments: Holyrood Palace, Abbey and Gardens*

*New Town Gardens - Historic Gardens/Designed Landscape - Inventory Site (Calton Hill & Holyrood Palace Gardens & Regent Terrace Gardens)  
- Outstanding Universal Value [OUV] of Edinburgh Old and New Towns World Heritage Site [WHS]*

*In addition this letter responds to the associated Listed Building Consent application (15/03990/LBC) and the Environmental Statement (EIA-EDB053).*

*We have previously objected to the planning permission affecting some of the above heritage assets because we do not consider it is possible to deliver a hotel of this scale on the site without unacceptable harm to the historic environment (our letter dated 17 September).*

*This letter expands on that response and confirms both that we object to the planning application and that we cannot support the application for listed building consent.*

*We regard the Royal High School as one of Scotland's most significant buildings. We consider it to be of international significance as one of the world's highlights of Greek Revival architecture, fully the equal of the work of masters such as Leo von Klenze or K F Schinkel in Germany, or William Wilkins or Sir Robert Smirke in England.*

*We consider that the proposals would, above all, have a significant adverse impact on the integrity, setting and significance of the Royal High School, and on that basis alone we would object to the proposals.*

*We further consider that the proposals would have an adverse impact on the integrity of Calton Hill, which forms a critical and visually prominent element of The New Town Gardens Inventory designed landscape, and on the setting of the A-listed monuments on the Hill; and of St Andrew's House, sufficient in each case to warrant our objection. As regards the impact on the settings of Holyrood, of the Burns' Monument, and of Regent Terrace, we consider that not to be harmful to the extent that would warrant our objection.*

*Regarding the World Heritage Site, we dispute strongly the statement within the Heritage Impact Assessment that the present development would have a more beneficial than adverse impact on its OUV. The high significance of the Royal High School to the WHS was highlighted in the first Management Plan, and that degree of importance remains obvious today. We consider that the present proposals would have a significant adverse impact on the school's setting, reducing the building's current prominence and dominance of its carefully conceived site to that of a routine piece of neo-Classical townscape. The proposals would also introduce development in an area kept deliberately free in order to create the important setting and views of the hill, and would intrude on the wider architectural impact exploited from the site by the school and its relationship with major buildings to its west (originally Robert Adam's Bridewell Prison - now St Andrews House) and the monuments on the hill, including the National Monument, the Parthenon to the Royal High School's Propylaea.*

*We also consider that the assessment presented within the Environmental Statement does not adequately consider the impacts of the proposed development on all aspects of the historic environment, and consequently we have difficulty placing confidence in its conclusions.*

*With regard to the Listed Building Consent application, we recognise the degree of proposed intervention has been scaled down significantly from what we saw previously. However, there remains a high level of change being proposed, including interventions both inside and on the flanks, demolition of listed buildings, original boundary treatments and the addition of highly over-scaled wings to each end of the main building. The proposed western extension conflicts with Historic Scotland's Guidance, and whilst we have advised previously that we could see scope for a new development east of the main building, the current scale, location, height and prominence of the combined flanking extensions proposed sets them wholly at odds with our previous advice.*

*We consider this to be an overdevelopment of the site which is harmful to the character and special interest of the listed building and its wider setting, and we are unconvinced that the present scheme represents the only option for the building's future.*

*I attach as an annex (1) a more detailed appraisal of the proposals set against the impacts they would have and (2) copies of previous correspondence on this matter.*

*Annex 1: ROYAL HIGH SCHOOL: Detailed Consideration:*

#### *Background*

*Historic Scotland was not involved in, but became aware of the original Council competition process for the building in 2009 after being approached by three of the bidders, and wrote to your Council in November 2009 to discuss approaches to the site. At this stage we repeated advice given during the earlier Museum of Photography discussions which viewed opportunities for new development on the site in three distinct areas.*

*We considered that the central portion of the site containing the listed Hamilton school building should be subject to minimal change, largely repair and conservation, with any alterations or additions kept to an absolute minimum, and then justified for essential functional need.*

*The western part of the site, which contained the western playground, lodge and entrance gates, had a more open aspect and provided an important setting for the hill, school and St Andrew's House. We considered that any development in this area would have to be very carefully considered, and later suggested a pavilion structure of around one storey may be possible.*

*This left the eastern part of the site, which we considered had a more discrete aspect and, although highly visible in long views, we considered it was capable of some development. We later suggested that, provided it was fully justified, and allowed a conservation-based scheme for the remainder of the site, we could accept a case for the loss of the classroom/ gymnasium building, and other ancillary structures here.*

*Once Duddingston House Properties had been appointed as preferred bidder we followed up with another letter, in March 2010, outlining our strong initial concerns with the emerging proposals by Gareth Hoskins architects. Although, the designs were at a basic concept stage they proposed two, largely glazed, wings with 150 hotel rooms between them, either side of the main listed building. As designs developed we followed up with another letter in June 2010, and following a series of five workshop sessions, provided a more detailed response in October 2014. We have placed these letters as Annex 2.*

*More recently we attended a design review at Architecture & Design Scotland (A&DS). These meetings were directed towards the design of the hotel only, with the suitability of the proposed use, conservation and demolition works and the quantum of enabling development possible specifically not under discussion. A&DS considered these issues should be examined by other bodies as a pre-requisite to the design review's consideration.*

*As part of the current application we welcome the work on the historical evolution of the site and its buildings undertaken within the Heritage Statement by Andrew PK Wright, and the other documents produced to assist our consideration of the case.*

*Planning Permission (15/03989/FUL)*

*We are now responding in more detail on the specific reasons for our objection to the planning permission application.*

*The Royal High School and its setting;*

*The international importance of Thomas Hamilton's Royal High School building is undisputed. Arguably the most significant and accomplished Greek Revival building in the UK, it has claims to be amongst the finest on a worldwide stage.*

*The Royal High School, built between 1825 and 1829 is Hamilton's masterpiece. It is, as the historian Howard Colvin notes 'admirably composed, impeccably detailed and magnificently situated'. More than this it is a skilful adaption of the windowless Greek temple to a modern use, more truthful than many other Revival buildings which often sacrificed authenticity for usability. Hamilton was able to adapt the form of the Propylaea, the gateway building to the Acropolis in Athens, to serve as a similar foil to the National Monument, a replicate Parthenon then being constructed on Calton Hill. Hamilton sourced details from the Temple of Hephaestus (or Theseus) in Athens, further cementing, indeed securing Edinburgh's Enlightenment name as the 'Athens of the North'. This allusion, originally an intellectual description, was carried on to the ideals inherent in the school's educational role. Additionally, the building itself, Scotland's finest classical school, was an early use of the Greek Revival style, a distinct style that would help differentiate the capital Edinburgh (Athens) from the capital London (Rome), and one which, was embraced nationally by Scotland, before being later eclipsed by styles sourced from Scotland's own historical past.*

*In assessing the setting of the school we have followed our Managing Change in the Historic Environment guidance on setting (Oct 2010). The managing change guidance explains in detail how to apply Scottish Ministers' policies contained in the Scottish Historic Environment Policy (SHEP). Where development is proposed this guidance notes the importance of first identifying the historic asset, then defining its setting, and finally assessing how any new development would impact on this setting.*

*Hamilton's Royal High School, and its associated pavilions, screen walls, gateways and railings is clearly the principal asset, alongside the less important later buildings covered by the listing, including the gymnasium/classroom block and the lodge.*

*It is first worth considering the immediate setting of the building itself. Although the main architectural treatment and monumentality of the building is necessarily directed towards the windowless front elevation the secondary elevations echo the 'impeccable' detailing and careful assemblage of details and elevations. This was perhaps inevitable as the main entrance to the building has always been from the rear, the convoluted frontage access only being for limited ceremonial use. Therefore, the rear elevation, visible from many points on the hill, not least the access road, is given a finer elevational treatment than might otherwise be expected, with a central pilastered portico. In addition, the building is approached from the west, and it is the carefully composed and symmetrical west elevation (naturally mirrored on the east) that provides the visitor with a first view of the building.*

*(This can be seen in Hamilton's elevation drawing on p.34 of Part 1 of the Heritage Statement). Thus, the building must be seen 'in the round' with any interventions to the rear and sides of the site carefully handled so as not to harm the overall setting.*

*The wider setting of the building is also important. It is prominently situated at the base of Calton Hill with the main elevation facing south, and is visible from many positions across the city, including from the hill. (Many are shown on the illustrated HIA photomontages). The backdrop to the building is the rock, gorse and woodland of the hill itself. The school was originally built on an artificial ledge in the centre of the site flanked by playgrounds with the open background of the hill on both sides. Although the eastern playground was partly developed (initially at a lower level) the western playground has remained comparatively clear, with only single-storey buildings tucked in the lee of the hill's access road. This must be deliberate, and it should be noted that even when the school was looking for extra space to expand the western playground appeared sacrosanct with the importance of the building and its setting here a consideration in the final move to Barnton in 1968. The structures here include the western lodge, a classical homage to the main building by the Edinburgh School Board specialist Robert Wilson, and the original Hamilton gates, piers and railings. Under the proposals both these elements would be demolished, their mutual relationship with the main school lost.*

*Our Managing Change guidance for extensions (Oct 2010) notes that extensions to listed buildings must protect the character and appearance of the building; should be subordinate in scale and form; should be located on a secondary elevation; and must be designed in a high-quality manner using appropriate materials. Consequently, it is not expected that an extension, or extensions, will dominate a listed building either through scale, materials, location or height. The document also notes that extensions should be sensitive and modestly scaled, skilfully sited, and should generally be lower and set-back behind the principal façade. We do not consider that the current proposals address these key considerations.*

*The most recent revisions to the bedroom wings have redesigned their form and configuration providing a more 'organic' design with purposely different materials and character. They have sought to draw the upper levels of the wings away from the main Hamilton building, to allow a space for the listed building, and to reduce the effect, from the previous proposals, of a continuous 'wall' or terrace of development from Regent Terrace across the site from east to west. Nevertheless, they are still linked to the main listed building, creating small enclosed courts. Besides the unfortunate linkage through the facade, discussed under the listed building consent, the design and position of the western bedroom wing would almost completely mask and obscure the important and carefully composed western side elevation, currently visible from the western approach and entrance to the site. The new wings and linkage to the listed building would inevitably limit the current understanding and appreciation of the building, currently seen in the round.*

*The design and changed configuration of the new bedroom wings has actually meant an increase in the height of the building on the western playground to six-storeys, so that it is now a full 10 metres above the side elevations of the Hamilton building, with the eastern wing over a full storey higher. We consider the former school would become subordinate to its proposed wings rather than the desired opposite.*

*The change in materials from stone to copper would serve to differentiate the wings from the material of the main building, but numerous storeys of full-height glazing would still have a radical impact by the windowless temple, reflecting the light by day and lit-up by night. The design and height of the new wings would be immediately noticeable, drawing the eye from the more sombre Craighleith clothing of the school.*

### *Conclusion*

*We consider that both wings, and specifically the six-storey western bedroom wing, would, by their height, scale and massing, dominate and overwhelm the listed building challenging its primacy on the site. The proposals would, if implemented, diminish significantly the building's status as an internationally-acclaimed exemplar of Greek Revival architecture. The harm to the setting and character of the building would be considerable, it being impossible to view and appreciate Hamilton's masterpiece, either by itself or in context, without the oversized extensions taking precedence.*

*The New Town Gardens Inventory Designed Landscape The Royal High School is located on the southern flank of Calton Hill, which forms a significant and visually prominent element of The New Town Gardens Inventory designed landscape. The designed landscape makes an outstanding contribution to the Edinburgh townscape, providing a setting of the surrounding buildings and monuments. The architectural historian Charles McKean described Calton Hill as 'every bit as symbolic a location to Edinburgh as the Castle, and even more carefully crafted for picturesque effect, albeit in classical rather than military garb.' It has outstanding historical, architectural and scenic value as well as outstanding value as a work of art. The Calton Hill Conservation Plan, produced in 1999 by LDN Architects, found that 'Calton Hill, its buildings, monuments, burial grounds and landscape is a Scottish cultural asset of international importance which should be cared for and promoted as such'. It notes that '[the] hill cannot be considered in isolation from the features of the wider hill which create its setting such as the vista along Waterloo Place, Calton Hill Terrace, the whole of the Regent/Royal Terraces and their gardens which provide a wooded continuation of the hill to the east, the London Road and Regent Road roadside gardens, the former Royal High School, St Andrew's House, and Regent Road which creates such an impressive approach to the city'.*

*We consider the proposals would harm the carefully-planned setting and relationship between the hill and the former school, the latter having been thoughtfully designed and positioned to harmonise with the natural contours of the site. The development of the Calton Hill area was the subject of a competition, and eventually passed to the architect William Playfair to implement. Playfair worked to recommendations of William Stark, an architect well versed in 18th century picturesque theory, which formed the basic principles and ideas for laying out Calton Hill. Stark favoured a less formal or geometric design, taking full account of the topography, and keeping the hilltop free of commercial housing development. As a result the school (and the surrounding Royal and Regent Terraces) was carefully placed on an artificial terrace, a substantial and costly civil engineering exercise, but one that retained the building's relationship with the topography and base of the hill, evident in the pavilions to the central block following the sweep of the road.*

*Calton Hill is prominent and visible from a wide range of locations, its monuments giving it emphasis and a characteristic form.*

*The proposed development would have an adverse impact on a series of important views of Calton Hill, and its picturesque composition of landform and monuments. The view from Queens Drive in Holyrood Park, which forms part of the Palace of Holyroodhouse Inventory designed landscape, is illustrated in Viewpoint 13.32. The proposed hotel wings dominate the view and obscure much of hillside of Calton Hill, robbing the school building of its landscape setting and changing the scale of the composition. This visualisation demonstrates that the proposed development would have a significant negative impact on this key view of Calton Hill with its carefully planned relationship of dramatic landform, wooded slopes and imposing buildings.*

### *Conclusion*

*The proposals would impact on the key characteristics and landscape features of Calton Hill, as well as introducing a development that would harm the established and carefully planned character of the hill. We therefore consider the development would have an adverse impact on the integrity of this part of the Inventory designed landscape.*

### *Setting of other Category A Listed buildings*

*Our objection is primarily focused on the impact the proposals would have on the Royal High School, but there are other A listed buildings in the vicinity that are affected, by differing degrees, to the proposals. We consider the impact on the following Category A listed buildings would be sufficient in each case to warrant our objection.*

### *St Andrew's House*

*The development of the western playground with the six-storey hotel wing would adversely affect the setting of the Category A listed St Andrew's House. Designed in 1934, David M Walker notes in, *St Andrew's House - An Edinburgh Controversy 1912-1939*, that the architect (later Sir) Thomas Tait specifically took reference in his Report to the 'monuments on Calton Hill' together with 'particular consideration' being given to the 'architecture of the High School buildings adjoining' He also took care to design a building that would address the Calton Hill, with its 'varied and picturesque monuments forming an ideal background for the new building'. Tait's design was generally agreed to have done so, neither 'overloading the hill or obliterating its fine outline' The new six-storey bedroom wing, which inclines towards St Andrew's House, would reduce the current impact of St Andrew's House against the hill's backdrop introducing a level of development between it and the school. The 'filling in' of this open green space would enforce the 'wall of development' in long views.*

### *Monuments on Calton Hill*

*The Conservation Plan for the Hill notes that 'nearly all the major buildings and monuments on the hill were built during this period [early nineteenth century], including the Royal High School and National Monument, and all were built in classical styles that alluded to classicism and reinforced the intellectual link with Athens'. The Royal High School clearly has strong links to the monuments on the hill, particularly the National Monument which was under construction, its completion assumed when Hamilton designed the school. The National Monument was to be a restored version of the Parthenon in Athens, a choice helped by Calton Hill's visual resemblance (seen by many) to the Acropolis. Therefore, when Hamilton based his design on the Propylaea, the gateway building to the Acropolis in Athens, the link was obvious and intentional.*

*The relationship between the school building and its picturesque setting by the hill, with its skyline monuments, reproduced in numerous images, would be harmed by the large extensions either side of the listed building. The sheer scale and visibility of the new bedroom wings would immediately draw the eye reducing the former school in stature and prominence, and in particular harming the links between the unfinished Parthenon and its Propylaea.*

*Although we consider there would be some impact on the following Category A listed buildings it would not be to an extent that would warrant an objection in its own right.*

#### *Burns Monument:*

*The Burns Monument was also designed by Thomas Hamilton, and again adopts an Athenian classicism, this time sourced from the Choragic Monument of Lysicrates, which was also the inspiration for the Dugald Stewart Monument on the hill by William Playfair. Views made with both monument and school included were common. The Monument's current setting against the lower 'gymnasium' block would be affected by the increase in scale of the eastern hotel wing but the impact is not considered significant.*

#### *Regent Terrace*

*The proposals introduce a larger block to the western end of the listed Regent Terrace, but the impact would not be significant.*

#### *Royal Park*

*The development is within 800m of a Royal Park. Although the proposed development would likely be visible from the Royal Park, its impact would not be significant.*

#### *Holyrood Palace, Abbey and Gardens - Scheduled Monument*

*The Addendum to Part 3 of the Heritage Impact Assessment images show that the proposed development would be visible from the palace grounds, a scheduled monument, and likely the palace itself, a Category A listed building, but the impact is not considered significant.*

#### *World Heritage Site*

*Both the former Royal High School and Calton Hill have great importance within the Old and New Towns of Edinburgh World Heritage Site. The former school is also within the New Town Conservation Area whose Conservation Area Character Appraisal identifies it as an integral component within the ensemble of monuments and buildings on Calton Hill.*

*The Inscription Document for the World Heritage site (1995) notes the survival of some of the finest public and commercial monuments of the Neo-classical revival in Europe, reflecting the status of the capital of Scotland as a major centre of thought and learning in the 18th century Age of Enlightenment. The first Management Plan specifically identifies the Royal High School as one of three 'notable public buildings', in the New Town, the others being Register House and the Royal Scottish Academy. The Royal High school is undoubtedly a key building within the WHS, and the proposals would have a significantly adverse impact on its setting, reducing its current prominence and domination of its carefully conceived site to a subordinate structure to its new bedroom wings.*

*The Management Plan recognises the 'dramatic topography' of Calton Hill and its 'collection of nationally important monuments'. It also notes the care taken to maximise 'long views and the picturesque quality of the site' in its original early nineteenth century development.*

*The proposals would harm these characteristics, introducing development in an area kept deliberately free for the important setting and views of the hill, but also for the architectural impact exploited from the site by the school and its relationship with St Andrews House and the monuments on the hill, including the National Monument, the Parthenon to the Royal High School's Propylaea.*

#### *Conclusion*

*Regarding the World Heritage Site, we dispute strongly the statement within the Heritage Impact Assessment that the present development would have a more beneficial than adverse impact on its OUV. We consider the development would have a significant adverse impact on the settings both of the A-listed buildings and of Calton Hill.*

#### *Listed Building Consent (15/03990/LBC)*

*As listed building consent concerns any works that affect the character of a listed building, there are several comments mentioned above that would apply to both planning permission and listed building consent, most notably our strong concerns over the setting of the listed building. In addition, we will comment on the physical interventions to the listed building and the demolition of buildings and structures included within the wider listing.*

*In our letter of 25 June 2015 we have previously commented on the listed building aspects of the emerging scheme, some elements of which still apply.*

#### *The Royal High School (The Hamilton Building)*

*We welcome the repairs proposed for the main building and recognise there have been revisions made during the design process to respond to concerns over the external treatment of the main listed building. In particular, we welcome the removal of the proposed new staircase from Regent Road, glazed winter gardens, rear porch cochere and additional openings under the portico. We have previously discussed, and accepted, the general principle for new access openings to the rear of the main hall and the proposed addition of a glazed circulation corridor to ensure the main rooms remain independent. The careful detailing of this corridor will allow the building to remain visible behind. However, the two proposed new openings into each of the two 'dining lounges' from the glazed corridor are of concern. It would seem less damaging to the historic fabric to utilise the immediately adjacent and original existing doorways as lobbies to the spaces instead. As planned, the original doorways are proposed to serve a cleaners' cupboard and as a lobby to a toilet.*

*Another matter of concern are the links between the listed building and the proposed new wings. We note the additional images showing the detailed treatment, but our strong concerns over the treatment of the listed building remain. Both the side elevations of the Hamilton building are carefully detailed and visible symmetrical facades.*

*The desire to access the façade at two different positions with two different approaches would adversely affect the symmetry of the façade, the lower floor of which would become an internal courtyard with limited external visibility, rather than an important open element of a considered and visible façade. The rear two-storey corridor link would intersect with the façade awkwardly, truncating the Vitruvian window surround and involving the loss of the lower window, fanlight and stonework.*

*We agree with the heritage statement that the enclosed links to the east and west pavilions are adverse. The accommodation of these elements within the wider development could have been handled more sympathetically. Even though from the south these additions will be largely obscured by the screen wall, filling in the open space here will harm the individuality and separate nature of the pavilions, reducing understanding of these important buildings within the wider site. As before, we have strong concerns with the proposed access bay at the east of the site off Regent Road. The large slapping in the enclosure wall would entail the loss of the articulated door and its Vitruvian doorpiece, as well as other unwelcome alterations to a carefully considered elevation. We believe a less interventionist alternative could be found.*

*We note that full access from Regent Road is now discretely proposed by a lift within the left niche reached through a passageway in the bedrock providing access to the floor above. This would appear to be a skilful and creative solution to providing full access without impacting on the ceremonial stairways. Internally, we welcome the restoration work in the main hall including the restoration of Hamilton's doorpiece in the south wall of the main hall, removed for a marble alternative in the 1920s - itself removed to Barnton. The opening up of the door is also welcomed but the external balustrade would need to be carefully handled if it is not to be visible.*

*The removal of the PSA balcony extension and restoration of the original stairs to access it are also welcome, as are repairs to the coffered ceiling. We also welcome the deletion of the proposed storm lobby whose design was to 'complete' the balcony despite it being originally absent from either end wall. However, the proposed loss of the form and fabric of the school assembly hall, retained in the PSA works, with its ranked tiers of seating and central 'well' would be unfortunate. It is a distinctive feature of the original school, noted in the Heritage Statement as 'well-proportioned' and 'memorable. It was retained and adapted for the proposed Scottish Assembly.*

*Elsewhere in the building we welcome the reopening of larger volumes in rooms formerly subdivided by the PSA, and any investigation and restoration of original decorative schemes. Demolition of listed curtilage buildings and structures The applicants have used SHEP test c.) in order to justify the demolition of the lodge and gymnasium/classroom block, arguing that the loss of both buildings are essential in order to deliver significant benefits to economic growth. In addition the gymnasium block is considered to be of less worthy of listing in its own right. Both buildings were designed in 1885 by Robert Wilson, the Edinburgh School Board architect, with the gymnasium extensively added to in 1894, and are covered by the Category A listing. In the case of applications for demolition, it is Scottish Ministers' policy that no listed building should be demolished unless it can be clearly demonstrated that every effort has been made to retain it. In order to justify this test the benefits to the economy would have to be substantial, on at least at a regional level. In addition, the benefits would only be able to be achieved with the loss of the buildings.*

*Your Council may be best placed to judge the economic justification provided, but we have concerns that the need to demolish the buildings is based on this specific scheme and that other less invasive proposals may be able to retain more of the buildings, specifically the lodge and boundary treatments.*

*Lodge: The western lodge is, all parties agree, in good condition and of architectural and historic merit, contributing to the understanding and evolution of the site at its important entrance. As above, we remain to be convinced that its loss is justified. Entrance gates, piers, steps and boundary walling Alongside the later lodge, the proposals involve the loss of Hamilton's original entrance gates, gatepiers and a substantial run of boundary wall and railings. Elsewhere steps and walling will be lost. Hamilton's care for attention and detail is evident in the various boundary treatments he employed throughout the site. The applicant notes the importance of the rear boundary wall and belvedere, but we would argue that the very visible and public-facing gatepiers and associated walls and features should be afforded at least the same attention, especially as the new bedroom wing will obscure most views of the restored belvedere.*

*The loss of these elements, the entire entrance to the site, is most unwelcome. Gymnasium / Classroom block We have previously accepted that a case for the demolition and redevelopment of the gymnasium could be made if it enabled a conservation-based solution for the remainder of the site. We still believe a case could be made, but do not consider the current scheme to be either sympathetic or conservation-based. Conclusion In conclusion, there are several interventions to the main listed building that are unwelcome, but we understand that for some of these interventions a balance may need to be struck in order to configure a new use successfully. The linking of the listed building to the new bedroom wings would involve particular and permanent harm to Hamilton's considered side elevations. We are also unconvinced that the justification for the demolition of the lodge, gymnasium/ classroom block and boundary treatments has yet been made. We also have very strong concerns, indeed cannot support, the new wings proposed for the listed building. Their scale, massing and height would dominate and overwhelm the listed building, significantly damaging its character and special interest. Environmental Statement (EIA-EDB053).*

#### *General*

*It is Historic Scotland's view that the assessment presented within the Environmental Statement does not adequately consider the impacts of the proposed development on all aspects of the historic environment. In addition to this, we have some significant concerns about the quality of assessment presented within Chapter 10 (Historic Environment) and, as such, have difficulty placing confidence in its conclusions.*

*The layout of the Environmental Statement is very complicated and difficult to follow, with historic environment information and assessment spread across a number of chapters and appendices. Key areas of the assessment are not clearly sign-posted and there is limited cross-referencing throughout the document, leading to an overall confusion of material.*

*Our understanding is that the main focus of Chapter 10 (Historic Environment) is upon the impact of the proposed development on the listed buildings and archaeology within the development site boundary. Impacts on nearby listed buildings, the World Heritage Site (WHS), the Inventory Designed Landscape and Conservation Areas are assessed as part of Appendix J4 (Heritage Impact Assessment), Appendix J7 (Assessment of Operational Effects) and within Chapter 12 (Townscape).*

*Our detailed comments on these assessments are as follows:*

#### *Chapter 10: Historic Environment*

*As set out above, the scope of the assessment within the main text of Chapter 10 (Historic Environment) is limited to the impacts of the proposed development on the listed buildings and archaeology within the development site boundary. This is not made immediately clear within the introduction to the chapter, nor is it explained as the chapter progresses.*

*In addition to the limited scope of the assessment, we have concerns about the adequacy of assessment presented within this Chapter. There are significant missing pieces of information (e.g. criteria to define what constitutes a beneficial impact), and it is also not clear how the assessment criteria which have been set out have been applied throughout. These shortcomings are reflected in the overall structure of the assessment as detailed below.*

#### *Assessment Criteria*

*The assessment criteria presented as part of this assessment are not comprehensive and contain a number of irregularities. Most notably, the assessment criteria presented in Tables 10.2 and 10.4 (Magnitude of Effect) appear to only relate to adverse effects. It is therefore unclear what criteria has been used to arrive at the beneficial effects as set out in the Assessment Summary Matrix (Table 10.8). Without a clear set of criteria for determining beneficial effects, it is difficult to understand the thought processes underpinning the assessment.*

*Table 10.1 (Sensitivity of Historic Environment Assets to Change) also contains some unclear distinctions. For example, it is not clear from the information provided why assets of both 'very high' and 'high' sensitivity to change must be 'recognisably' of either international or national importance as no explanation has been provided for this. This is not a stipulation which appears in national policy for the historic environment.*

#### *Baseline and Assessment of Effects*

*The baseline information presented as part of this Chapter is also confusingly arranged. Given the large number of heritage designations affecting the site, this assessment does not clearly distinguish between the asset types assessed, nor does it make clear that the main focus of Chapter 10 is on the listed buildings and archaeology within the development site boundary. We would also note that in places this baseline information unusually attaches judgements on the significance of some of the assets, rather than simply outlining the current situation.*

#### *Assessment of Sensitivity to Change*

*There is an overall lack of clarity to the assessment of sensitivity to change as set out in paragraphs 10.7.16 - 10.7.23.*

*This is because the assessment of sensitivity to change does not appear to consistently apply the assessment criteria as set out in section 10.5, but rather appears to be a summary of the more detailed information provided in parts 1 and 2 of Andrew Wright's Heritage Statement (Appendices J2 and J3).*

*Without a clear understanding of how the assessment criteria have been applied, it is difficult to substantiate the conclusions reached within this part of the assessment.*

#### *Potential Effects and Good Environmental Management*

*This section of the Environmental Statement sets out how the applicant considers that the most significant effects of the development have been mitigated by the design of the development and the provision of a conservation strategy. As noted within our comments above regarding the planning application, we do not agree that the mitigation measures presented here are successful. We also do not consider that such measures would adequately compensate for the impacts of the proposed development.*

#### *Assessment of Effects*

*As stated above, due to gaps in the overall assessment framework, it is difficult to understand how the conclusions presented as part of Table 10.8 (Assessment Summary Matrix) have been reached. We do not agree with the conclusions presented and believe that the harm to and impact on the listed building has been underplayed significantly.*

*It is not clear, for example, how the conclusion over the beneficial nature of the impact of the demolition of the gymnasium block has been arrived at. It is also not clear how the 'visibility' of the retaining wall and Belvedere Tower will be maintained by the proposed development.*

#### *Mitigation and residual impacts*

*Further mitigation measures are identified in section 10.10. However, regarding the listed buildings, given the mitigation measures amount to a programme of building recording prior to demolition we do not accept that these would mitigate for their loss.*

#### *Appendix J4 - Heritage Impact Assessment*

*Part 3 of Andrew Wright's Heritage Statement contains a Heritage Impact Assessment (HIA) which deals specifically with impacts on the WHS. We note the assessment criteria and methodology used within the HIA. We note that whilst it is stated that there are no major adverse impacts predicted for the WHS that nor are there any major impacts of a beneficial nature. Finally for the HIA, the purpose of table 2 on page 106 is unclear, as our understanding of HIA is that it is not its role to balance impacts.*

#### *Appendix J7 - Assessment of Operational Effects*

*Together with Chapter 12 (Townscape), this appendix assesses the operational impacts of the proposed development on designated historic environment assets. This includes impacts on the Royal High School Building (28), the New Town Gardens Garden and Designed Landscape (32) and The Old and New Towns of Edinburgh WHS (33). This also includes impacts on proximate heritage assets including groups of Listed Buildings, Conservation Areas, Scheduled Monuments and Inventory Designed Landscapes.*

*We would consider this to be an important aspect of the assessment, the conclusions of which should be summarised in greater depth as part of Chapter 10 (Historic Environment). We would also expect greater cross-referencing between this Appendix and the assessment within Chapter 12 (Townscape). The assessment provided within this Appendix comprises a number of detached tables which describe the baseline setting of each historic environment asset, and describe the nature of changes that will be caused by the proposed development. We do not believe that the short assessments contained within this Appendix adequately address the impacts of the proposed development on key historic environment designations including the New Town Gardens Garden and Designed Landscape and The Old and New Towns of Edinburgh WHS. However, as discussed above, we note that a Heritage Impact Assessment has been undertaken for WHS matters within a wider Heritage Statement.*

*While we understand that professional judgement must be applied as part of this assessment, it is not always made clear how the assessment criteria have been applied in support of this. Overall we do not agree with the conclusions presented and believe that the harm caused by operational effects have been underplayed.*

#### *Chapter 12: Townscape*

*While we welcome the inclusion of a townscape assessment into the Environmental Statement as a method of considering the site in relation to the overall urban environment, we do not consider that this sufficiently addresses the impacts of the development on designated historic environment features. This is principally because we do not agree, as claimed within Section 12.3 of this Chapter, that the Old and New Towns of Edinburgh WHS and the Edinburgh New Town Gardens GDL should be considered as 'townscape designations' but rather that they should be considered in terms of their heritage significance.*

*We would therefore take the view that the methodology employed within Chapter 12 (Townscape) is not applicable to assessing the impacts of the proposed development on historic environment designations as it does not, for instance, seek to integrate historic environment policy or guidance. For these reasons, we also do not consider that the assessment criteria set out as part of this Chapter are applicable.*

#### *Conclusion*

*In summary, there are significant shortcomings to the overall impact assessment on the historic environment as presented within the Environmental Statement. The assessment within Chapter 10 (Historic Environment) is poorly structured and does not adequately consider the impact of the proposed development on key historic environment designations. It is also our view that the assessment presented within this chapter does not adequately measure the impacts of the proposed development on the listed buildings on site. We therefore disagree with the conclusions presented as part of this Chapter.*

*While we are broadly content with the methodology for the consideration of impacts on the World Heritage Site set out in Appendix J4 (Heritage Impact Assessment), we do not agree with the conclusions presented.*

*While we would support the inclusion of a Townscape Assessment within the Environmental Statement, we do not agree that this adequately addresses the impacts of the proposed development on important historic environment designations such the Edinburgh New Town Gardens GDL in terms of their heritage significance.*

*Nor do we agree that the assessments contained in Appendix J7 (Assessment of Operational Effects) sufficiently address the impacts on the Edinburgh New Town Gardens GDL and other proximate heritage assets.*

#### *Further consideration*

*Over the last five years Historic Scotland has taken part in numerous meetings, workshops and design reviews, and as a result of these has given full and consistent advice. Throughout this period we have welcomed the repair of, and long-term viable and sustainable use for, this nationally important listed building. However, we have consistently expressed strong concerns with an approach that attempted to provide a hotel of such scale on the site. Whilst we considered there was scope to redevelop the eastern part of the site, we believed the provision of a large building on the western playground could simply not be achieved without an unacceptably high level of impact on the historic environment.*

*Whilst welcoming and appreciating the architect's attempt to address concerns with the earlier pre-application proposals, including a far less invasive treatment of the Hamilton building itself, and the recent production of a radically different design approach, the revisions have actually raised the height of the proposed bedroom wings. One of our primary concerns, the development of the western playground, now proposes a building over two full storeys higher than the adjacent listed building.*

*However, and perhaps crucially, the revisions have left the key issue, the quantum of development on the site, unchanged, with only a very minimal decrease in hotel accommodation (3 bedrooms). For over five years we have questioned the quantum of development required, with discussions on what the site can accommodate without harm to the asset, but any potential solution has been difficult in the face of the applicant's desire to deliver around 150 bedrooms, together with the considerable ancillary accommodation required by a hotel of this scale and nature.*

*In our last letter of October 2014 we noted that a hotel of the scale outlined could not be delivered without what we regarded to be an unacceptably high level of impact to the historic environment. Although the design approach has been changed considerably since this date, the quantum of development remains the same.*

#### *Conclusion*

*We are committed to achieving the repair and reuse of the former Royal High School, one of Scotland's most significant buildings, and one of extremely few Scottish buildings to be internationally recognised as a masterpiece.*

*We have previously intimated we would agree the loss of several of the ancillary buildings on the site, where that necessary to help accomplish these aims. Whilst this application would likely achieve the repair and re-use of the building, we remain to be satisfied that there are no alternatives to the current scheme that can achieve this without such a level of resultant harm. We have not commented in detail on the proposed use of the building but clearly the choice of a hotel of this scale has led the current design and proposed overdevelopment of the site, whereas other uses presented during the bidding process, or a hotel of less scale may have been possible without the same levels of harm.*

*We have objected to the planning permission, and cannot support the listed building consent, because we do not consider it is possible to deliver a hotel of this scale on the site. We are convinced that this overdevelopment of the site is significantly harmful to the character and special interest of the listed building and its wider setting, and do not believe that this scheme represents the only option for the future of the Royal High School.*

## **Edinburgh World Heritage Trust - response dated 30/09/2015**

*Edinburgh World Heritage writes in response to the City of Edinburgh Council's request to give our advice on the impact of proposals for a hotel development in and around Hamilton's Royal High School on the outstanding universal value of the World Heritage Site. The organisation also wishes to formally object to the proposals.*

### *Background*

*EWH has, from 2010 onwards, offered its advice to both CEC and the Duddingston House Properties on proposals for the development of a hotel on the Royal High School. From the outset we have accepted that the site can accept a degree of development in support of the restoration and reuse of the main building.*

*Since then, as the proposals have become clearer, our advice has become more specific. Our engagement has been through site visits, informal discussion, workshops and written advice. We have given these proposals more time than any other development in the last five years, and have, from the outset, sought to give DHP clear and consistent advice.*

*EWH's early advice, in our June 2010 letter, noted the areas in relation to the OUV of the WHS*

*that would be affected by development at the Royal High School. These remain relevant*

*An outstanding set piece of neo-classical architecture*

*Topography*

*Townscape*

*Juxtaposition of the Old and New Town.*

*This is neatly summed up in one of the reasons given for the inscription of the WHS:*

*"The World Heritage Committee accepted that [Edinburgh] had townscape and buildings of international acclaim set within a landscape of exceptional drama"*

*Later advice focused specifically on the views from the west and south: the planned nature terminating with either buildings in public use or handsome green spaces. The Royal High School is sited to reflect this, with Elliot's Waterloo Place terminating in the greenery of Calton Hill, and views along the Queen's Drive terminating with the extraordinary set piece of the Royal High School.*

*Around the time DHP lodged the planning application notice (in early 2015), it became clear that the level of development proposed for the site was far greater than as originally proposed- perhaps twice as large- in the 2008 competitive dialogue that led to DHP's appointment. In simple terms, it became abundantly clear that there is no way that*

*proposals for a hotel of this size could be built on the site without having a major impact on the building and its setting and thence OUV.*

*An outstanding set-piece of neo-classical architecture*

*The Royal High School is a building of exceptional and unquestionable architectural interest. carefully composed and positioned. The proposals will in effect both diminish the building and remove its setting, placing buildings up to six stories sitting on a raised plinth on either side. It in effect turns Hamilton's building into an object, rather than an integrated part of an historic urban landscape. Our view is that the proposals are exceptionally insensitive to the importance of the building and will have a negative impact on OUV.*

*Topography*

*The buildings of both the Old and New Towns sit within a dramatic landscape and respect the rise and fall of the land through a regularity of height, with terraces of buildings following the contours, creating a consistent townscape. These regular heights are only ever broken by tall and uninhabited buildings, such as church spires. The proposals include a six storey element. the scale of which acts to diminish the drama of the hill: nearby St Andrews House, for example, is carefully designed to accentuate the drama of the hill, stepping down with the topography. The failure of the proposals to work with the topography will have a negative impact on OUV.*

*Townscape*

*Calton Hill plays a very important role in the townscape of the city, with Playfair's carefully planned scheme around its midriff and a range of important classical monuments on its peak. Even the seemingly gothic monument to Admiral Lord Nelson is based on an Adam design for the Brizlee Tower, itself seemingly modelled on ancient Pharos. It is a coherent and carefully planned townscape with a clear line of thought running through it, relating to the role of Edinburgh as a centre of the Scottish Enlightenment and its quest for a clear identity in the late 18th and first half of the 19th century as a capital city.*

*The proposals in question have no discernible relationship to the role of the hill in the city's townscape- indeed they actively work against it. It is our view that in this respect, the proposals will have a negative impact on OUV*

*Under this heading we would seek to include the influence of the picturesque- by the time Hamilton was working on designs for the Royal High School this movement was well established. In tucking the building into the hill, the formal processional route from Princes Street, along Archibald Elliot's set piece of Waterloo Place, seemingly becomes a route into the country, giving the strongest impression of rus in urbe -yet from the south the building is part of a rational architectural approach to the hill. In effect, Hamilton successfully squared two apparently opposing artistic movements into the one site. Positioning a new six storey block in the midst of this composition completely breaks the relationship to the picturesque.*

### *Juxtaposition of the Old and New Towns*

*The formal justification for the inscription of the Old and New Towns on the World Heritage List notes that:*

*"The harmonious juxtaposition of these two highly contrasting areas, each containing many buildings of great significance, is what gives the city its unique character"*

*The Royal High School is perhaps the clearest expression in a building of the thinking behind the New Town. It sits directly above the backs of the Canongate, closer to the Old Town than any other element of the New Town. The notion of juxtaposition could not be stronger. The proposals bear no relation in form, meaning or function to the site or philosophy of the New Town, and will have a strongly negative impact on the ability to read the Calton Hill as part of the New Town, clearly working against OUV.*

### *Alternatives*

*We would note that there are a number of suitable alternative locations for a hotel of the type promoted by this scheme, where the regeneration benefits would be much greater, and that a number of these sites are in the ownership of the local authority and Scottish Government.*

*We would further note that there is a fully funded alternative use for the Royal High School, which will in principle be sensitive to the outstanding universal value of the World Heritage Site, as well as its authenticity and integrity, and which is, in our view, greatly preferable to the hotel proposals.*

### *Conclusions*

*EWH has given a great deal of thought and advice in relation to this application, the conclusions of which are in line with that of CEC's and HS's officers. In each of the elements identified above, there is no evidence that EWH's advice has been taken into account in the development proposals. We fail to understand why DHP has continued to develop its proposals irrespective of this advice and the probable consequences of ignoring it.*

*The proposals will have a strongly negative impact on the Old and New Towns of Edinburgh World Heritage Site and as such garner our strongest opposition.*

### **Edinburgh World Heritage Trust: Response 25 November 2015**

*Further to the meeting with the development team on the 3rd November and their letter of 28th October, I write to reaffirm the position in relation to EWH's view on the impact of the development on the World Heritage site's outstanding universal value.*

*Edinburgh World Heritage Trust has gone back over the development team's heritage impact assessment. Many of the conclusions in relation to specific views in the HIA are a very long way from ours. An example of this is in views from the west, where the argument is made that the new block will have either a minor adverse or minor beneficial impact. Our considered view is that in these views it will have an impact that ranges from moderate adverse to major adverse. In the HIA's discussion of the different views, both the value of the existing setting of the Royal High School and the general landscape character of the hill seem to count for little.*

*If we were to revisit table 2 on page 106 of the HIA, summarizing the cumulative impacts, in our view the balance would be strongly in lower part of the stable, the realm of adverse impacts.*

*The annex to the letter of 28th October illustrates the fundamental misconception behind the arguments made in support of the development, with the curious statement from the development team that:*

*'It is considered to be the case that the bedroom wings [follow] Hamilton's approach in designing in a classical idiom (notional symmetry), but in a picturesque manner appropriate to the site and setting.'*

*The wings are not classical in design, nor are they symmetrical. The design has absolutely nothing to do with the picturesque movement and cannot be considered appropriate to the notion of rus in urbe that the Royal High School site so effectively embodies.*

### **Scottish Natural Heritage**

*Our advice covers the natural heritage considerations raised by this application as it is for others to advise on the cultural importance of the site, its built features and the detailed design of the proposal.*

#### *Summary of SNH's advice*

*The proposed development would have adverse effects on the appreciation of the landform of Calton Hill, an important and prominent landmark within the City of Edinburgh and the World Heritage Site. There would also be adverse effects on the landscape character of Calton Hill, as a result of changes to the balance between the semi-natural hillside and its built features. The proposal would also intrude into views towards other key landscape features within the city.*

#### *Background*

*Calton Hill is a very prominent and iconic landmark within the city. Its rugged natural form of exposed rock, gorse and tree cover is juxtaposed with buildings and monuments which fringe the hill and punctuate its summit. The hill is a popular recreational area for city residents and visitors offering spectacular views of the city centre and other key landscapes within the city and beyond. The hill has a particularly strong physical relationship to Arthur's Seat and Salisbury Crags, which are related geological features. The value of the hill is widely recognised in the multiple designations that apply to the hill and its immediate surroundings.*

*World Heritage Site, Gardens & Designed Landscape, Site of Special Scientific Interest, Conservation Area, candidate Special Landscape Area, Local Biodiversity Site, A listed buildings, part of Core Path 21.*

#### *Appraisal*

##### *Landscape and Visual Effects*

*Calton Hill and the area of the application site are characterised by the complex interaction of built and natural features.*

*The natural heritage interests of the area are of substantial importance and play a notable role in contributing to the character and identity of the city and the World Heritage Site. The following key issues relating to the impact of the proposal are relevant to our remit:*

- The adverse effects on the appreciation of the profile of Calton Hill - an important and prominent 'crag and tail' landform which serves as a landmark of major importance within the City of Edinburgh;*
- the adverse effects on the landscape character of Calton Hill, particularly resulting from the changes to the balance and visual composition of open, semi-natural hillside in relation to built features of the hill and its fringes; and*
- the nature of changes to important characteristic views, resulting from the intrusion of the proposed development into views towards other key landscape features within the city. Further commentary on these issues is provided in Appendix A of this letter.*

#### *Visualisations*

*The visualisations associated with this application have been produced from images using different camera focal lengths and portrayed in a single frame A3 image format. The images do not indicate a stated viewing distance to inform the user and are referenced as 'Illustrative image only. Not for use in the field'. As a result, these images are unlikely to be in accordance with The Landscape Institute Advice Note 01/11 on Photography and Photomontage in Landscape and Visual Impact Assessment. While we do not request further information to enable SNH's appraisal of the application, we would advise that City of Edinburgh Council takes care in understanding the limitations of the submitted images.*

#### *Cumulative issues*

*We also wish to highlight, the changes to the potential landscape/townscape baseline for this development, arising from the recent consent of the St James proposal. The potential cumulative effects of the proposed development with the St James development have only been assessed from two viewpoints. The combined effects of development on the city skyline should be considered more widely than this. We are not seeking further information on this issue for our own appraisal, but suggest City of Edinburgh Council should give this particular consideration.*

#### *Arthur's Seat Volcano Site of Special Scientific Interest (SSSI)*

*We note that the site boundary no longer takes in part of the SSSI and no direct physical impacts on the nationally important geological interests of the SSSI are anticipated.*

*The EIA discusses the remaining risk of indirect impacts to the SSSI via rock removal. It recommends 'a rock pre-treatment options assessment' to decide the best method to minimise risk. We strongly support this recommendation to ensure that rock excavation is carried out with the least risk to wider rock stability and the SSSI interests. Further comments relating to the SSSI are contained in Appendix A.*

#### *Protected Species – Bats*

*There is no evidence of bats in the buildings. Some of the buildings have roost potential, however, and the EIA recommends that they are re-checked prior to demolition. Provided works are carried out in accordance with this, and findings confirm no presence of bats, then the proposal will not require a species licence under protected species legislation.*

#### *Appendix A: Detailed comments on natural heritage issues*

*Set out below are our comments on what we consider to be the key and inter-related issues regarding the likely impact of the proposal on the natural heritage interests of the area and the appreciation and enjoyment of them.*

*The adverse effects on the appreciation of the profile of Calton Hill - an important and prominent 'crag and tail' landform which also serves as a landmark of major importance within the City of Edinburgh.*

*As one of Edinburgh's 'seven hills' and closely associated with other landscape features within the wider context of central Edinburgh (Arthur's Seat, Salisbury Crags and Castle Rock), Calton Hill is a landscape that has been heavily influenced by its underlying geology. Formed by volcanic eruptions some 300-350 million years ago, the hill as seen today is a product of glacial and fluvial erosion combined with natural colonisation and human influences, both in terms of design and management.*

*The important role that topography plays in the World Heritage Site (WHS) is highlighted in the key attributes of the WHS's Outstanding Universal Values, as set out within the WHS Management Plan 2011-2016. For example, in explaining the key attribute of Topography, Planned Alignments and Skyline in para 4.10, the management plan highlights:*

*The Old and New Towns both exploit the topography of their site and the value of views both within and out from to maximum effect. The historic plan forms allied to the dramatic topography results in important terminated and long vistas and landmark features.*

*And more specifically to the application area:*

*The Calton Hill development exploits the topography of its site and consists of two long outward facing terraces linked at an acute angle. It is built along a natural contour line, maximising long views and the picturesque qualities of the site.*

*While acknowledging that the topography of the immediate area of the proposed application site is one that has been manipulated over time to form terraces to accommodate built form, we consider that the proposed eastern and western buildings will, by virtue of their scale, have adverse effects on the appreciation of the natural profile of Calton Hill. In particular, we highlight the effects arising from the western building, which would more frequently be seen prominently against or in front of, the natural features of the hill and, will more frequently be seen to break the skyline formed by the hill.*

*While recognising the strong influence and well defined form of existing buildings and monuments, the current application proposal by virtue of its scale and location adds substantially to the 'skirt' of built form around the platform on the southern side of the hill. This additional development would reduce the proportion of the undeveloped skyline visible in views towards Calton Hill. This would diminish the appreciation of the natural topography and the 'crag and tail' upon which the existing built features of the hill lie.*

*These effects are pronounced from certain areas in close proximity to the proposal, for example on Regent Road (Viewpoint 21), where the western building will appear dominantly and directly in front of the hill, fully or partially obscuring the profile formed by the mass of the hill and the views to the monuments and woodland upon it. From other important locations the proposed buildings will appear to break the skyline and extensively alter the appearance and the predominantly natural profile of the hill. For example, the view from within the Old Town (Viewpoint 19: Canongate Parish Church Burial Ground) highlights the width, height and overall prominence of the proposed new buildings which break the skyline, with the proposed buildings also appearing to diminish the overall extent of the profile of the hill that can be seen. From this location we consider that the overall effect of the proposal on the appreciation of the relative steepness of the slopes and curvature of the crag and tail landform is of particular note.*

*From other areas within the city, for example Viewpoint 03: North Bridge and Viewpoint 22: Market Street, and potentially from areas close to Viewpoint 11b: Holyrood Park, the proposal is seen to be less dominant in relation to the appreciation of landform. Nonetheless the built form is likely to break the skyline, contrasting with the natural appearance of the predominantly vegetated existing skyline. From such viewpoints we consider that the introduction of further additional built form of this nature would alter the appearance of the natural landform and affect the carefully defined relationship of existing built features to it.*

*The adverse effects on the landscape character of Calton Hill, particularly resulting from the changes to the balance and visual composition of open, semi-natural hillside in relation to landmarks and other built features.*

*In simple terms, the existing landscape character of Calton Hill is influenced in part by the open views and the informal open space of the hill top, and in part by the steep, craggy and wooded slopes which surround it. The planned layout of the paths and built features of the area, including the important visual elements of the monuments which punctuate the skyline of Calton Hill, combine to create a complex landscape with a widely recognised and appreciated appearance. The strong influence of the William Playfair 1819 masterplan for the hill, and the picturesque character of the landscape which remains today, are widely documented, including within the Inventory of Gardens and Designed Landscapes where Calton Hill and the nearby Regent Gardens form part of the New Town Gardens site.*

*We consider that it is likely that people's appreciation of the landscape character of open spaces and extensive open views from the elevated areas of the hill will remain unaffected by the proposals.*

*However, when seen from outwith, the proposed development will result in a more continuous 'skirt' of buildings around the southern facing terraced platform of Calton Hill and this will, in certain views towards the hill from the south, reduce the proportion of steep, craggy and wooded slopes visible on the hill. We consider this change, including adverse effects to the important contributory role of the hill's craggy and steeply angled wooded side, will alter the landscape character of the hill as perceived from surrounding areas. The generally well balanced visual composition between the existing buildings and monuments, and the craggy and vegetated landscape which surrounds them, will also be notably altered.*

*There will be no substantial direct impacts on the rock and vegetation cover upon the hill (other than the relatively minor loss of tree cover and the physical ground changes within the application site). However, we consider that the appreciation of the landscape character of the hill from areas outwith the site will be adversely affected by the proposal by virtue of the perceived changes to vegetation cover and composition of features on the hill.*

*Examples of these effects include those experienced from a number of important viewpoints within the city including VP 9 a, b and c on Queen's Drive in Holyrood Park which illustrate the prominent scale and extent of the proposed built form compared to the relatively modest extent of the vegetated side slopes of the hill. Viewpoints 01 from Edinburgh Castle ramparts, Viewpoint 3a, b and c from North Bridge, Viewpoint 22 from Market Street, and Viewpoint 23 from Jeffrey Street, all highlight the reduction of open vegetated hillside that may be seen from such areas and highlight the overall changes to the compositional balance of key features on the hill, including the issues relating to the role of open hillside in contributing to the landscape setting of existing buildings and monuments.*

*The nature of changes to important characteristic views, resulting from the intrusion of the proposed development into views towards other key landscape features within the city.*

*We also wish to highlight the changes to views from certain specific areas close to the development, in particular those from Waterloo Place and from Calton Hill Drive.*

*From Waterloo Place (as represented by the sequence of Viewpoints 4a, b, c and d) the development will provide a sense of termination to eastwards views. We acknowledge that the western building proposal would be a new focal point, but there would be impacts on the experience of important views towards the more distant skylines formed by the iconic landmark features of Salisbury Crags and Arthur's Seat.*

*Taking a sequential approach from the west (from VP d to a) we consider that the proposed development would reduce the extent of skyline formed by Salisbury Crags and Arthur's Seat that is seen in such views. The western building by virtue of its scale would provide a new and visually competing element of focus within such views. The foreground dominance of the development, as would be experienced sequentially moving from west to east, would also alter and delay the experience of the spectacular open panoramas of Salisbury Crags and Arthur's Seat that can be gained from the east end of Waterloo Place (for example, as represented by VP 4a).*

*From Calton Hill Drive, as an important access and recreational route onto the hill, the scale and proximity of the development would restrict the existing characteristic views outwards, under, between or through vegetation, and towards the distant city landmarks of Castle Rock, Arthur's Seat and Salisbury Crags. Although of somewhat lesser importance than the fully open views from higher up on the hill, the intrusion of built development into such views en route to the hill summit is of note and the proposed development would affect the 'gradual reveal' of outward views to surrounding landscapes that can be experienced from this route.*

### *Detailed Design*

*We note the proposals for management and replacement of existing trees and other planting, changes to the public realm, access improvements to Calton Hill and for night-time lighting. We also note the proposals for green roofs utilising native species. We consider that these matters of detail have been appropriately considered in the submitted application. However, we would welcome dialogue on any future detailed design of access improvements to the hill and SSSI.*

### *Arthur's Seat Volcano SSSI*

*Although there will be no direct physical impact on the SSSI, there are potential indirect impacts through the rock excavations required for construction. The EIA discusses this risk of indirect impacts to the SSSI via rock removal. It is acknowledged in 9.9.10 that vibrations caused by rock removal could affect the integrity of important rock exposures. It is proposed that 'a rock pre-treatment options assessment' will be undertaken to decide the best method to reduce this risk. At present the likely options for rock removal are precision controlled rock blasting and chemical rock breaking but the assessment would look at these and other methods before coming to a conclusion. We recommend that the council ensures that this assessment process is undertaken to minimise risk to nationally important rock exposures.*

*We wish to continue to be consulted regarding the outcomes of any assessments and potential impacts of rock removal and excavation (as stated in Mitigation 9.10.3). Such excavation work could have positive or negative implications for the SSSI rock exposures so it is important that on-going dialogue continues over the assessment (and mitigation) as design detail develops.*

*We welcome the involvement of British Geological Survey in observing and recording temporary rock exposures during excavation. We highlight the opportunity of interpretation where there is any potential to retain new exposures or where features of interest are found and documented.*

## **Architecture and Design Scotland: Appraisal Report : 13 May 2015**

### *Introduction*

*(This summarises project status and background information that was indicated to A+DS prior to the workshop or clarified by the parties during the workshop. In the event that any of the statements made in this introduction are considered incorrect A+DS should be advised and the report will be amended.)*

## *1.0 Context for A+DS Involvement*

### *2.0*

*1.1 A detailed planning application is intended including proposals for retention and restoration of elements of the Category A Listed Royal High School buildings, selective demolitions of other elements, new extensions and substantial public realm works in and around the site.*

*1.2 The currently proposed use of the Royal High School [RHS] as an international hotel, and the selection of a developer/architect team, was the result of a competitive selection process for the site run by the City of Edinburgh Council [CEC] in 2009.*

*The project forms part of the 'Edinburgh 12', a Council-led programme intended to progress important gap sites within Edinburgh towards contributing to the economic and social well-being of the City and is part of the former 'String of Pearls' initiative to regenerate the city centre and boost Edinburgh's position as a leading retail and tourism destination.*

*1.3 The proposal to run a series of Design Forum workshops in support of design development for the project emerged as a joint request by the Project Team and the City of Edinburgh Council in December 2014. The Design Forum workshop series built on earlier discussions and dialogue in 2014 between the project team, the council and key stakeholders.*

## *2.0 Scope of Engagement and Response*

*2.1 The aim of the Design Forum workshop series has been to support the consolidation of an appropriate design response for the proposed conversion of the Royal High School building into a hotel, including consideration of alternative design options for handling the scale, proportion and massing of buildings proposed in a prominent and historically significant location.*

*2.2 A+DS did not review the suitability of the proposed use of the building nor policies related to the conservation, demolition and restorations proposed, nor the case for and quantum of enabling development justifiable in connection with restorations. The examination of these issues by other bodies is a pre-requisite to the consideration of the design appraisal below.*

*2.3 The principle criteria considered through the process were those considerations set out by the Council in December 2014. These being:*

- 1. The Royal High School must remain the visually prominent building on the site*
- 2. Development should not try and 'extend' the existing building (the new development should be placed within the site)*
- 3. There needs to be a sufficient gap between the building and any development to allow the RHS building to read a single entity, to ensure views to the hill behind and to prevent coalescence of development along the bottom of the hill.*
- 4. Development needs to be pushed back as far as possible*

5. Height - this may depend on the location of the new development. Critical that height is assessed from all viewpoints - i.e. approach from Waterloo Place and views down from Calton Hill

6. Notional symmetry may work but provided there is not an attempt to try and 'finish' Hamilton's building.

7. Any design must not compete with the RHS building; it needs to be recessive yet of significant design quality.

*In addition, consideration of the proposals has extended beyond the site boundaries to review the role of buildings on the site as part of a conception of a composed grouping of buildings, monuments and landscape on Calton Hill that to some extent characterise Calton Hill, Edinburgh ['Athens of the North'] and the World Heritage site. The panel also reviewed the means of improving public access to the site, the building, road and routes around and across Calton Hill.*

2.4 A series of three workshops were held between February and May 2015, with the first workshop incorporating a site visit and a tour of the surviving interiors of the Royal High School building. The final workshop of the series involved an appraisal of the proposal prior to the intended planning application. All workshops have involved the Project Team [Client representatives and Consultants], City of Edinburgh Council officers, Historic Scotland, a representative of Edinburgh World Heritage and the Design Forum expert panel, supported by A+DS staff.

### 3.0 Project Appraisal

*The appraisal below considers the extent to which the design presented has addressed issues raised at previous workshops and is therefore structured firstly to reiterate substantive points, then the panelist's consideration of the design response presented followed by any further advice for design development prior to submission of the application. This note is intended to be a concluding report of the process thus far and supersedes the interim notes produced through dialogue. It is not A+DS's intention to publish this appraisal report at this time and we would request that it is not published in full or in part by others until the planning application is submitted. This report will be lodged on the A+Ds web site once the planning application has been submitted. However we reserve the right to publish our report in full if and when any of our advice is made public in advance of an application being submitted.*

### 3.1 Summary Appraisal

3.1.1 *The substantial nature of design changes made during the past three months in parallel with the A+DS Design Forum series were fully acknowledged. A+DS welcome the notable effort of the project team to address matters raised by A+DS and others during the Design Forum process. The preparedness of the project team and client to listen and respond to a host of views and to engage in dialogue in a very meaningful way were particularly noted. Substantive change and a significantly improved proposal have resulted. We understand that this responsiveness extends to design changes resulting from community representations and public engagement events and this is also recognised and welcomed by A+DS.*

3.1.2 A+DS are supportive of the changes made and of the present proposals. The proposals could be further improved by addressing the points raised and highlighted in this report. The A+DS panel considered this work now demonstrates the opportunity for a hotel development as a means to save an important historic building whose significance and role for the city has been widely acknowledged. A+DS consider that the proposals offer some potential benefits to setting through rationalizing the current piecemeal development on the site and particularly in encouraging public access to the area by enlivening arrival points to Calton Hill. We encourage the design to be developed further particularly in relation to the arts strategy, to increase physical and intellectual access in line with OUV.

3.1.3 The panel noted the need to balance issues of scale with commercial viability and quality, which trade off against one another. Nevertheless the issue of quantum has yet to be fully addressed and a further reduction in the proposed scale of development at the west playground would be beneficial in doing so. It is recognised that a stronger commercial case will allow greater investment in the quality of the architecture and the public realm. And by the same token it is also recognised that an exceptional quality of architecture and public realm design is needed to avert concerns and to bring about a step change improvement in the setting and public accessibility of the listed buildings and monuments on Calton Hill. A+DS consider the present proposals have the capacity to achieve the quality commensurate with the historic significance of the site and building, with some design development in the detailing and material expression of the architecture. The required balance between viability and quality has yet to be fully resolved between the council and the project team and a reduction in scale, if viable, and if quality aims can be achieved, would help considerably in addressing the remaining concerns of A+DS and others about the west end massing of the proposed building.

3.1.4 A+DS consider that matters previously raised by other consultees and by the A+DS panel during the design Forum process have been largely addressed. This includes not only those matters raised in earlier workshops but also the councils 7 points as set down in December 2014 noted in 2..3 above.

3.1.5 In consideration of all of these points A+DS appraised the present proposals as well considered and supported [category 2]. This support could be improved to Potential Exemplar [category 1] if the points raised in this report are fully addressed. A+DS's support is conditional on a further review of the outcome and design developments arising from the intended Landscape and Visual Impact Assessment.

## 3.2 Conclusion on Landscape Design and Landscape Setting.

### 3.2.1 Earlier advice on this topic included:-

- "The panel emphasised the fundamental importance of retaining the geological character, the ruggedness of the crags and slopes of Calton Hill, and the intrinsic bond with the city of the hill-valley juxtaposition. This has also been emphasised by SNH and it underpins points raised by council officers. There is a subtle and designed juxtaposition of nature and man-made structures that has survived over time, forming an evolved narrative essential to understanding Calton Hill and to considering the consequences of change."

- *"The panel welcomed the increasing clarity of understanding that is beginning to emerge through analysis of the built and landscape context via historical maps and records, around the nature, morphology and historic significance of the landscape and setting; the way it has changed whilst maintaining a clear identity. This includes the juxtaposition of Thomas Hamilton's composition with Calton Hill, shelves carved out for playgrounds, framing by tree blocks and street trees along Regent Road. Bringing landscape morphology into the historical appraisal is very much welcomed. This needs to address the whole composition of buildings and landscape and the interactions between them. The LVIA in full needs to clearly set out the key defining characteristics arising from this analysis."*

- *"The panel considered that this landscape character should influence the design of the currently proposed extensions to a greater extent."*

*3.2.2 Appraisal on this topic: The panel consider that these matters have been substantively addressed in significantly changed proposals with a landscaped approach. The historical and contextual analysis of landscape carried out by the team is particularly welcomed and recognised. This builds confidence that an understanding of landscape character and morphology has fundamentally influenced the proposals. This has led to a more sensitive handling of the proposed buildings in this context. The hotel annexes have become a form of built landscape that is recessive, forming a calm frame highlighting the jewel of the original building. And this recessive landscape form also allows the new built elements to become visually interwoven into the rocky hillside of Calton Hill. Calton Hill can be seen to flow down through the Royal High School building and round about it; and the designers have added a fifth dimension to the landscape; a view to be seen from above; adding to what is there.*

*3.2.3 Further advice: There needs to be further testing through the Landscape and Visual Impact Assessment to ensure space to allow the distinctions of separate buildings (St Andrews House, The Royal High School, Calton Terrace), monuments and landscape characteristics remain evident from key viewpoints. The currently tested views suggest that the space is there however this needs to be checked following the more thorough appraisal intended.*

*3.2.4 Further advice: The ideas presented for the handling of soft landscape; to integrate this into the wild gorseland of the hillside, to bring this across and around the building are promising; however these are as yet unconcluded. There is a need to consider the planting proposed across the roof of the building. Interesting early thoughts were tabled on the use of green roofs as a means of integrating the building into the Hillside setting. Finding a form for these that achieves the ambition to relate to the setting, rather than being a layer of ornamentation, is important to their success in providing a 'fifth dimension' to the proposals. Equally the elements of framing landscape and the role of tree planting at the Regent Road frontage needs to be considered, building on the morphological analysis.*

*3.2.5 Further advice: The buildings and detailed landscape proposals must respond to the findings of the Landscape and Visual Impact Assessment process and A+DS would request to be consulted on the findings and outcome of this process.*

### *3.3 Conclusions Related to Form, Scale and Massing of Extensions*

#### *3.3.1 Earlier advice on this topic included:*

- "The use of exploratory models was exemplary and allowed a very useful and constructive dialogue amongst stakeholders around the consequences of alternative handling of massing."

- "The real challenge is to get the scale right addressing each part of the site. Subtle shifts and stepping back in the proposed massing have started to address this to some limited extent, but the panel considered that there is a more substantial step change needed to address the wider questions of setting. There was some disappointment that options tested, and that gained the beginnings of a broader consensus of support around the room, had not been pursued - the more fluid/detached option in particular."

- "A departure from the symmetrical approach currently offered would also be welcomed as discussed at the earlier A+DS workshop. It was suggested that a hybrid of two of the exploratory modelled options offer a potential solution for distinct east and west handling, including: a freer/smaller western element of hotel rooms that responds to the 360degree panoramic location, allowing broad gaps for distant views through in between blocks and a range of views out; and by contrast, at the eastern end where the present massing approach appears to nestle better into the slope amongst existing tree cover and set back from the adjoining Regent Terrace, there may be some potential to re-adjust such that this end absorbs the larger footprint of hotel rooms. There is an exercise to consider whether east end density can increase and whether it is possible to build closer to the back/east boundary wall."

- "Greater articulation of east and west geometries could allow something to happen internally [e.g. atrium] [in place of corridors] - building on the possibilities offered by the unique topography, the immediate views of the RHS and St Andrews House, the monuments, rocky hillside, gardens and above all the wider city views."

- "There was some further discussion around the perception of the whole grouping as a wall of buildings. At present the proposed buildings are likely to be perceived to amalgamate urban frontages across the hill in a single linear massing incorporating the original building and linking Regent Terrace with St Andrews House. To avert this perception the panel emphasised the need to move away from the idea of the extension as 2 wings that are part of the same thing, towards more visibly distinct annexes, even if the whole functions as 1 building. By analogy less the new wing of the house and more the detached structure in the garden; the original building having its own landscape and breathing space. Including substantial perforations in the massing to retain the upper-to-lower hill landscape linkage will mitigate lots of concerns in this respect. This should be informed by testing perception from key viewpoints in the southern city such as Jeffrey Street and Queen's Drive. There is also an exercise needed, as part of this, to develop the thinking about the landscape character through the site e.g. within the perforations and across the roof landscape proposed."

- "In terms of architectural language and materiality there were useful conversations, building on points raised at the first workshop that should inform design development."

*There is a concern about the scale and proportion of the colonnaded form and the solidity of masonry as seen in oblique views; both leading to a monumental appearance. From some angles this will look more solid than the original building. The panel encouraged exploration of a lighter material language as a foil for the masonry massing of the RHS building. This also needs to be explored in views both day and night to test that the juxtaposition of new and old materials can be subtly handled. Colour and lighting are important - lighter stone and increased glazing will make new elements more visually prominent particularly at night - consider lighting strategy to ensure correct balance."*

*3.3.2 Appraisal on this topic: The panel consider that these matters have been substantively addressed in the current proposals due the significant design changes made. The changes allow the school building to have primacy and to offset concerns about a wall of buildings through fluidity of space and the integration of the building as landscape. In so doing there is also emerging clarity that the landscape character of Calton Hill can be retained and its appreciation improved through a more attractive and accessible public realm (see also 3.4 and 3.5 below). A+DS consider that the changed proposals carry the potential to enhance the city setting, including the approach from Waterloo Place.*

*3.3.3 Appraisal on this topic: The proposed new build elements are now working more as a frame to the original building and less as an extension. The workshop discussed the value of the additions in framing the masterpiece, the Rembrandt, and the international examples show how this approach can be successful with a considered architecture. At present, with the openness of the western approach along Regent Road, the loose collection of later buildings around the school, and the unmanaged landscape elements around the original building, the panel consider that the frame is relatively weak and that a considered addition in this location would be beneficial both for the city setting and the setting of the original school buildings. There is potential for the appreciation of the building to be enhanced within a framework that respects the original building and the landscape, creating more focus, establishing a better managed environment and better public experience than is available at present. The sculptural and material qualities of the proposed additions demonstrate the potential of a suitable frame. In this the principle of letting people in is very important, of allowing a wider appreciation of the school building (see also 3.5.2).*

*3.3.4 Further advice: The sculptural quality of the additions is important and already evident. Quality in detail is also essential and whilst what is emerging and convincing to date, including intentions to integrate plant and services into the plinth and within the elevations, the elevational detail needs some further development. The development of the materials palette linked to the geological landscape is convincing, and the use of bronze, for example would bring a lightness to it. There needs to be a calm longevity established in the forms and expression of the building and there is still potential for greater shifts in character from west to east addressing the differing conditions and aspects. The emerging materials palette is convincing in the context, the association with geological form, the reference to Salisbury Crags and the synergy with the landscape character of Calton Hill are all working well. This needs to be developed in the detail of elevational character to capture the site specific identity intended and to play down the generic associations of offset vertical banding.*

*3.3.5 Further advice: Scale remains a question and the extent to which the west end can accept massing without this having a detrimental effect on the appreciation of the setting. This needs to be considered with reference to the outcome of the Landscape and Visual Impact Assessment: in particular:*

- The approach from Waterloo Place.*
- The revealed view of the wider landscape and Arthurs Seat past St Andrews House*
- Skyline Visibility from viewpoints to the south*
- The ribbon/s of landscape connecting lower to upper Calton Hill.*
- The view across the site from above on ascending Calton Hill (the RHS as foreground to the city panorama).*

### *3.4 Conclusions on Public Realm and Arts Strategy*

#### *3.4.1 Earlier advice on this topic included:*

- "The intentions of the client for incorporation of publicly accessible art and temporary events space within and without the building were very much welcomed. The questions in this respect were around implementation, the degree of public accessibility and the handling of 'threshold anxiety', how the exclusive nature of the hotel may be daunting for ordinary folk. The panel indicated that a robust framework was required to address these issues. This is part of the tradeoff of conversion and it should reflect the cultural role of the building and Calton Hill for the city. A public art strategy was strongly encouraged, and it was acknowledged that this needs to be fully supported and developed in conjunction with the council. Public art needs to come from initiatives at city level to a greater extent - how does this proposal bond in? There should be a link to a wider strategy for public access to Calton Hill, Regents Gardens and to city-wide cultural and arts locations, which are understood to be lacking at present. Having a strong framework will be critical for future management and the maintenance of public access in the long term if hotel operators change."*
- "It was noted that there is great potential to integrate public art commissions that respond to characteristics of the site: historic significance, cultural identity, landscape setting, topography, built heritage."*

*3.4.2 Appraisal on this topic: Potential exists for the integration of public art and for improving public access to the historic interior of the buildings as set out above however the management framework that would secure this has yet to be put in place. There is still no evidence of how this will be implemented and therefore this remains an area of concern in the proposals. This aspect could have a key influence on the assessment of OUV as, if developed well, it could increase physical and intellectual access to both the Hamilton building and Calton Hill, overcoming past barriers to access and improving cultural value for the city and its resident's visitor.*

*3.4.3 Further advice: The means of realising verbally stated aspirations needs to be set down clearly including the extent of public access to the historic interiors, the means of incorporating public art, space for events, and the means of integrating access around Calton Hill. Elements need to be identified and clearly signposted in the design proposals. A+DS recommend commitment to a public art strategy or similar vehicle that is incorporated into the planning submission. The Scotsman steps are a good example of the way in which public art can enhance the international profile of a site.*

### *3.5 Conclusion Relative to Handling Entrances and the Public Realm*

#### *3.5.1 Earlier advice on this topic included:*

*"The dilemma of entrances front and back remains, as discussed at the first workshop - coming in from the back is not ideal. Public access routes to the interiors of the RHS building also need to be more clearly defined. The single entrance space linking front with back is key to unlocking this. However, the means of getting people up there from street level on Regents Road and building consensus around the extent of alterations involved both need to be resolved."*

*- 'There was an acknowledged need to look further at which areas the public can and cannot get to externally at street level - the front west paved terrace alongside the function suite in particular'*

*- 'The quantum of public realm and streetscape also needs some consideration since this risks being too large and disparate. It is imperative that the spirit of areas within the public realm come alive and that they are well used. It is possible to imagine the café being a nice place to go, for example, and there was strong support for making more of the gateway route from Waterloo Place, the route up from Jacobs ladder and the route up Calton Hill behind the site towards The Nelson Monument and the National Monument'*

*- 'The panel would like to see how the intentions described for footpaths, public art integration and the movements across and beyond the site are to be delivered.'*

*3.5.2 Appraisal on this topic: Improvements in all these areas were recognized and many concerns have fallen away with the significant change in the fluidity of public spaces around the building. The panel could imagine more of the buzz of a street with things happening in and around the building, with security and wellbeing of visitors improved all around. Through the workshop process A+DS have advocated the importance of greater democratisation of access to this important historic site, access around the building and to the interior, all of which are currently either unavailable or diminished. The move towards access all around rather than a front /back distinction is a major step forwards, and in particular, the opening up of the north elevation of the school building associated with a public space, entrances and the public route climbing up Calton Hill, sharing spatial characteristics with precedents such as Victoria Street. There is potential to create an interesting public space north of the building where an entrance to the hotel becomes more convincing than before, coupled with the retention of the existing entrances from Regent Road. The reuse of the original southern entrances and staircases was welcomed as was the withdrawal of the previously proposed winter gardens.*

*3.5.3 Further advice: The proposed north elevation to this space and the public realm design around the building and public route up the hill need to be developed to make full use of their potential. Resolution of the character of the approach to the north entrance from Waterloo Place, whether it is shared surface, how it contributes to legibility and how it deals with the challenge of a northerly aspect and enclosure of the old retaining wall, has yet to be described in the proposals and will be needed to make the entrance to the building a success.*

*3.5.4 Further advice: The arrangement of public realm and gardens levels could be better resolved at the south western frontage to create more fluent semi -public spaces and stronger visual passage of landscape between school and the western annexe.*

*3.5.5 The panel encouraged the Council to work jointly with the Project Team to realise public realm improvements beyond the boundary of the site. The treatment of Regents Road will be critical to improving connections to Jacob's Ladder, the Burns Monument and other features/routes as well as to the setting of the RHS building.*

### *3.6 Conclusions Relative to Handling Historic Buildings Alterations*

#### *3.6.1 Earlier advice on this topic included:*

*- 'In terms of interventions in the historic fabric the panel acknowledged that, to avoid mothballing and if the historic interiors spaces are to become publicly accessible, there need to be a degree of change to, and opening up of, the listed building. However lack of progress in firming up options is concerning. The Project Team were encouraged, as a matter of urgency, to develop their discussion with Historic Scotland and the council. If Historic Scotland could acknowledge the need for a degree of opening up and if the Project Team could pass on the detail of their option appraisals then this would help open up dialogue. It was suggested that the winter gardens could be re-considered by developing the circulation options at plinth level.'*

*- 'Any changes need to be about democratisation of access - allowing more people to enjoy and understand the building and to appreciate its significance in the wider city and landscape setting. The panel encouraged development of options that allow access from Regent Road -though not necessarily axial. There is a need to provide easy and good access from the public realm up and into the heart of the listed building. There is also a need to show how design of the routes in will address 'threshold anxiety' and not add to it.'*

*3.6.2 Appraisal on this topic: The firming-up on options for handling alterations to the listed building has progressed, however this aspect was not considered in detail by A+DS at the workshop and therefore the A+DS appraisal does not extend to these aspects. The omission of the previously proposed winter garden at the south elevation was welcomed. Also the retention of existing south entrances in place of a greater degree of opening up (in particular the previously proposed stairway at Regent Road) was recognized as a considered response to the concerns of Historic Scotland and others.*

*3.6.3 Further advice: The earlier advice given above - item 3.6.1 is re-iterated. A+DS consider that the allowance for public access should be considered a legitimate trade-off for a degree of interventions and alteration to the building.*

### *3.7 Conclusion on Presentation*

#### *3.7.1 Earlier advice on this topic included:*

*- 'The models and much of the illustration work has been presented without representing the proposed landscape elements whether roof landscape, trees or other elements. All future 3d work should demonstrate the landscape intentions and integration in full.'*

*3.7.2 Appraisal on this topic: The quality, extent and exploratory nature of imagery presented has been highly informative, giving a clear idea of what is intended and a strong commitment to the visual quality of the proposals and the quality of experiences intended at street level.*

*3.7.3 Further advice: The proposals for planting and in particular tree planting have yet to be fully determined or illustrated and this should be addressed as part of the process flowing from the Landscape and Visual Impact Assessment.*

*3.7.4 Further advice: Continuation of the process of illustration is strongly encouraged to expose through a sequential series of views, the unfolding character of spaces, framed views, 'conceal and reveal' views intended as well as the quality of experiences anticipated at street level. It is the anticipated quality of these experiences that provide part of the case for support of the project by A+DS.*

#### **4.0 Next Steps**

*4.1 A+DS request the opportunity to provide a desktop review of the Landscape and Visual Impact Assessment outputs, and any consequent design changes and clarified planting proposals applicable once these are available. If requested by City of Edinburgh Council this further review stage is offered as a consultee response by A+DS in connection with the intended planning application with the purpose of advising the Council if the evidence provided resolves the aspects of further advice noted above and amends the appraisal in section 3.1.*

#### **Architecture and Design Scotland, further comments received 9 September 2015**

*Further to the submission of the planning application above and in light of our pre-application discussions with the applicant and their design team, we have the following comments to offer on the proposed development.*

##### *Principle of Development*

*Following discussions with your Council, Historic Scotland and Scottish Natural Heritage we understand that owing to the importance of the setting, the nature of the building, its listed status and the demolitions proposed, development of the scale and type proposed may only be considered acceptable should it be clear that the proposals address a number of critical policy tests, both national and local, and in particular that development is the minimum necessary to secure the re-use of the original Thomas Hamilton school building. We have not assessed the proposals in terms of these policy tests. However, should these be met, we believe the current proposals are of sufficient design quality to be capable of being supported, subject to the revisions outlined below.*

##### *Background*

*The project has been the subject of three Design Forum workshops between February and May 2015. The scope of these workshops was to consider:*

- the quality of design of the public realm, architectural response, landscape and materials.*
- alternative design options for handling the scale, proportion and massing of proposed new built elements,*

- the potential human experience of the development in relation to the brief that has been articulated by the development team, including aspirations for public accessibility and public art.

An appraisal workshop was held on 13th May 2015 and a report issued on this dated 1st June 2015. The opinion provided at that time was provisional on evidencing of impacts through the Landscape and Visual Impact Assessment (LVIA), and the further development of aspects of detailed design in the lead up to the planning submission. The outcome of this further work was presented by Gareth Hoskins to an A&DS panel at Bakehouse Close on 24th August. This was augmented by drawings received on 28th August describing the revised access arrangements into the existing building from the south. We understand that the information presented and received forms the basis of the application for planning consent subsequently submitted last week. Since we viewed the proposals in May, the detail of the new build and landscape elements have been developed and visual impacts tested through the LVIA process. Whilst the design approach remains largely unchanged relative to that presented in May, amendments to the form of the extension have been made in response to the LVIA to reduce visibility from key viewpoints. An Arts and Culture Strategy has also been received.

#### *Appraisal*

Having reviewed the above material we consider that the earlier appraisal of the project is still relevant and forms the substantive part of our advice. A copy of this is attached. Therefore, subject to the case for development being successfully made, we believe that the current

proposals are well considered and supported subject to the following issues being addressed:

#### *Public art strategy*

Throughout the workshop series, the concept of an 'art hotel', where the public is given greater physical and intellectual access to the historic environment and the local landscape setting has been a key aspect of the scheme. The Arts and Culture Strategy document indicates an intent to incorporate public art in a number of locations in and around the building. We support this as a precondition of permission and would encourage it to be extended along the pedestrian route up Calton Hill.

#### *Public realm*

While the approach taken within the development site is welcome we were encouraged by the strategy for the upgrading of the wider public realm of Regent Road in front of the Royal High School, at St Andrews House and including the pedestrian route up Calton Hill to make these more attractive and accessible. This greater potential remains beyond the site boundary and this should be taken forward through a partnership approach between the developer, the council, community groups and neighbours.

#### *Detailed external design of the extensions*

Maintaining the quality of the detailed design is essential if the extensions are to integrate successfully into the local townscape/ landscape. While the scale, massing and proportion of the extensions are considered acceptable, the quality of the development is highly dependent on the further development of detailed design, the use of quality materials, the modelling and depth of the facade required to provide texture and shadow and on the integration of services. In addition, we encourage the following amendments.

*The fenestration should be amended so that opening windows are better integrated with the rhythm of the façade modelling ribs. The layout and planting patterns on the upper roofs should be developed further to create a more naturalised fit into the wider landscape.*

*Public access to main building.*

*We encourage further development of approaches to lighting and art that enliven arrival routes and attract use. Further, in developing an interior design and operation for the hotel the operator is encouraged to bring the interior spaces to life through considered interior design that continues to maximise the extent of spaces available to the public, including removing perceptual barriers that would discourage public use.*

*Interior of extensions.*

*The quality of interior spaces for hotel guests should also be followed through as discussed. In further developing an interior design and operation for the hotel the operator is encouraged to ensure that welcoming, day lit sequences of spaces lead to the hotel rooms, with atria, lightwells or other spatial and visual events re-introduced to break up long corridors.*

### **City Strategy and Economy**

*The following are comments from the City of Edinburgh Council's Economic Development service which relate to the planning application 15/03989/FUL for the adaptive reuse of the former Royal High School as a 147-bedroom hotel.*

*Edinburgh's economic strategy, 'A Strategy for Jobs 2012-17' aims to achieve sustainable economic growth through supporting the creation and safeguarding of jobs in Edinburgh. A key element of delivering jobs-driven economic growth is the provision of an adequate supply of workplaces.*

*In adherence with Capital Coalition Pledge 17 - "Continue efforts to develop the City's gap sites and encourage regeneration" - the City of Edinburgh Council is committed to supporting development across the city. The Edinburgh 12 initiative was introduced by the Council in 2013 to assist with the progression of developments on strategic gap sites within Edinburgh's city centre. 12 sites were identified as having the greatest economic impact and which could be delivered within the next five years within the city centre. The former Royal High School is one of these sites. It is estimated that the Edinburgh 12 could collectively directly support over 19,000 full-time equivalent end use jobs upon completion.*

*The 'Edinburgh 2020' Edinburgh Tourism Strategy (adopted 2012) was developed by the Edinburgh Tourism Action Group (made up of representatives of the city's tourism sector along with Scottish Enterprise and the City of Edinburgh Council) to set out a vision for tourism in Edinburgh. The three core aims of the strategy are to, by 2020, increase tourism visits by one third; increase average visitor expenditure by 10% in real terms; and reduce seasonality by attracting more visitors in the off-season.*

*Commentary on existing uses:*

*The site in question is currently occupied by the former Royal High School (FRHS), an A-listed former secondary school. The FRHS constitutes a complex of seven buildings - five listed 19th century buildings and two unlisted 20th century buildings (along with boundary walls, gateposts, railings and a belvedere tower, all of which are also listed):*

- 1) *The 1825 Hamilton Building (net internal area estimated at 1,831m<sup>2</sup>);*
- 2) *The 1946 Classroom Block to the west of the main building (NIA 126m<sup>2</sup>);*
- 3) *The 1924 Luncheon Hall to the southeast of the main building (NIA 216m<sup>2</sup>);*
- 4) *The 1894 Gymnasium Block to the northeast of the main building (NIA 649m<sup>2</sup>);*
- 5) *The 1825 West Pavilion (NIA 72m<sup>2</sup>);*
- 6) *The 1825 East Pavilion (NIA 72m<sup>2</sup>);*
- 7) *The 1885 Gate Lodge to the far west of the main building (NIA 62m<sup>2</sup>).*

*The FRHS was designed by Thomas Hamilton in the Greek Revival style and built between 1825 and 1829. It is frequently cited as a leading example of Scottish Greek Revival architecture and as an important element of Edinburgh's World Heritage Site. The building occupies a prominent location at the base of Calton Hill below the National Monument. The building was listed in 1966. Works undertaken in the late 1970s saw many of the original interior elements altered or removed.*

*The Royal High School relocated to a new building in 1968, leaving the building empty. In the late 1970s, extensive internal works were undertaken to convert the school into a debating chamber for the proposed Scottish Assembly. Edinburgh District Council resumed ownership of the FRHS in 1993. Thereafter, a number of uses for the building were mooted, including a civic building; a sixth form college; a museum; a music conservatoire; and a boutique cinema. None of the proposals materialised, with a recurring theme being a requirement for a large upfront capital grant and ongoing public sector financial support. The FRHS was used intermittently by the Council as office space until being largely mothballed in 2010 as a cost reduction exercise.*

*The FRHS is currently in a state of dilapidation with erosion of the stonework and vegetation growth to the exterior and water damage to the interior as a result of roof leaks. This reflects in part the extensive energy, maintenance and security costs associated with the building (the Council spends approximately £250,000 per annum), leaving limited budget for major repairs to the building. The property agent DTZ has advised that buildings 1 to 6 are not currently fit for occupation due to their condition.*

*The FRHS complex is located on Regent Road, placing it within Edinburgh city centre. As set out in the Strategic Development Plan for South East Scotland, Edinburgh city centre "performs a broad range of regional and national functions including shopping, office, leisure, culture, tourism and government" and is the principal city centre for South East Scotland. The Princes Street Development Brief for Block 10 states that "the block has the potential to deliver a cultural and visitor destination and become a key connection between the existing and emerging developments within the Old Town and the St James Quarter". The retail and leisure offering of the city centre to the east of Princes Street is sporadic, with major breaks in the active frontage at Regent's Bridge and the Old Calton Burial Ground wall. At present, the offering comes to an abrupt end at Howies Restaurant at the eastern extent of Waterloo Place, with no clear demarcation of the "end" of the city centre and nothing to draw footfall onward.*

*Uses of the FRHS complex 'as is'*

*Buildings 1 to 6 of the FRHS are currently vacant and therefore do not directly support any jobs at present. Building 7 is currently occupied by the City of Edinburgh Council, supporting >5 full-time equivalent jobs. The prospects for bringing the remaining 6 buildings back into use without major alternations are unclear.*

*The original use of the FRHS was as a secondary school, and there have been a number of proposals to restore it for this purpose since 1968. The original FRHS had a roll of approximately 400 pupils. On average, there is 1 teacher per 12 pupils in Scottish secondary schools. This suggests that, if the FRHS was to resume operation as a secondary school, it could be expected to support approximately 33 teaching posts (along with a number of ancillary posts). It is recognised that there have been substantial changes to school building standards since 1968; it is therefore unclear whether bringing the FRHS back into operation as a secondary school without making substantial material changes would be realistic.*

*Since 1968, elements of the FRHS have been occupied on an ad hoc basis as office space. It is estimated that the existing FRHS complex has a total combined net internal area of approximately 3,028m<sup>2</sup>. If the FRHS was to continue to be used as office space, this could be expected to support approximately 252 full-time equivalent jobs if fully occupied based on average employment densities. However, it is considered highly unlikely that the FRHS complex could be fully let on commercial terms in its current condition; as noted, there has been limited continual occupation of the FRHS since 1968. The FRHS does not meet the typical specifications of occupiers (such as open floor-plates and good energy efficiency) and lies considerably outwith the city's central office district. Occupier interest would therefore likely be contingent on quoting heavily discounted rents.*

*It is noted that the use of the FRHS as either a secondary school or as office accommodation is unlikely to be compatible with regular public access to the complex.*

*In light of the complexity and bespoke nature of the building and its current condition as noted by DTZ, it is suggested that there is realistically limited scope for re-use of the FRHS complex without some form of major refurbishment.*

#### *Commentary on proposed uses*

*The applicant proposes to convert the Royal High School into a 147-bedroom hotel. Buildings 1, 5 and 6 would be retained and restored, albeit with extensive renovation of the interiors (to include the restoration of some original features removed in the 1970s). Buildings 2, 3, 4 and 7 would be removed and replaced with two newly-built wings. The grounds of the FRHS would be extensively landscaped.*

*The redeveloped FRHS would deliver a gross internal area of 18,408m<sup>2</sup>. This would comprise 9,500m<sup>2</sup> of guest accommodation; 5,000m<sup>2</sup> of public-facing spaces; and 3,900m<sup>2</sup> of back-of-house space. Approximately 27% of the redeveloped FRHS would therefore be accessible to the general public.*

*The applicant proposes that, should planning consent be granted, the hotel could open in spring 2018.*

#### *- Class 7 - Hotels and hostels*

*The proposed development would deliver a 147 bedroom hotel. The hotel bedrooms would be located in the two newly-built wings to the east and west of the existing Hamilton Building: 73 in the west wing and 74 in the east wing. It is noted that the asymmetrical fourth floor on the west wing houses just two bedrooms. The Hamilton Building itself would house storage and plant on the basement level; a spa, ballroom, café, whisky bar, meeting rooms and staff facilities on the lower ground floor; and the main reception hall and four restaurants/bars on the upper ground floor.*

*The number of bedrooms within the hotel informs both the design and the business model. The applicant is bound by an agreement with the Council to deliver a minimum of 120 bedrooms. There are four existing 'full service' luxury hotels in Edinburgh: the Sheraton Grand (269 bedrooms); the Caledonian Waldorf Astoria (241 bedrooms); the Balmoral (188 bedrooms); and the G&V Royal Mile Hotel (136 bedrooms). 147 bedrooms is therefore of below average size for a hotel of this calibre in Edinburgh. The developer states that a 147 bedroom hotel will deliver a 15% return on investment whereas a 127 bedroom hotel would deliver only 8%, the latter amounting to an unattractive investment prospect.*

*There is a recognised need for additional high quality visitor accommodation in Edinburgh. The 2012 Tourist Accommodation Audit commissioned by ETAG concluded that Edinburgh would require between 1,182 and 1,379 additional 4\* and 5\* hotel bedrooms (not including serviced apartments) by 2021 to cope with demand. Since 2012, two 4\* hotels totalling 230 bedrooms have been delivered. There are a further 612 4\* and 5\* hotel bedrooms in the pipeline (at the India Buildings, Edinburgh St James and the Royal Highland Showground). The addition of the Royal High School would give a total of 989 new 4\* and 5\* hotel bedrooms delivered or in the pipeline, leaving a shortfall of just 200-400 additional rooms required by 2021.*

*In 2014, the average daily rate of a hotel room in Edinburgh was £86.44. This compared to £96.13 in Barcelona; £106.96 in Amsterdam; £115.58 in Rome; and £204.62 in Paris. In the same year, hotel occupancy in Edinburgh averaged 80.5%, compared to 80.4% in Paris; 78.4% in Amsterdam; 73.0% in Barcelona; and 69.2% in Rome. This suggests that there is potential for room rate growth in Edinburgh. In 2014, daily expenditure by overseas visitors to Edinburgh was £20 (22%) lower than that of visitors to London. Raising daily expenditure of overseas visitors to Edinburgh to match that of visitors to London would be worth an additional £163 million to Edinburgh's economy every year. Raising daily expenditure entails enhancing Edinburgh's tourist offering, including the quality of its visitor accommodation.*

*- Overall impact*

*Oxford Economics has prepared an economic impact assessment for the development. The EIA suggests that, over the two year construction phase, the development would add £27 million of gross domestic product to Edinburgh's economy and support 510 jobs. Upon completion, the development is projected to generate £31.5 million of gross domestic product for Edinburgh each year and support 840 jobs in Edinburgh (260 directly, plus another 310 through supply chain and employee expenditure and a further 270 due to increased visitor expenditure). The methodology used by Oxford Economics has been reviewed and is considered to be robust.*

*A key consideration will be the extent to which the development created employment and training opportunities for local residents, in particular those facing barriers to employment.*

**SUMMARY RESPONSE TO CONSULTATION**

*An economic impact assessment carried out by Oxford Economics suggests that the FRHS complex could, if redeveloped, directly support approximately 260 jobs. This compares favourably to the number of jobs currently supported by the complex (<5) and the number of jobs it is thought the FRHS could support if brought back into use as a school (33 teaching posts plus ancillary posts).*

*It is estimated that the current FRHS complex could potentially support approximately 252 full-time equivalent jobs if fully-let as office space but the feasibility of this is considered to be low.*

*Oxford Economics calculates that the development could potentially support a total of 840 jobs in Edinburgh (once supply chain expenditure, staff expenditure and visitor expenditure are taken into consideration) and increase the city's economic output by £31.5 million per annum. The development would therefore be of substantial economic benefit.*

*The development would entail the removal of buildings 2, 3, 4 and 7. It is noted in particular that building 7, the Gate Lodge, is A-listed and currently in good condition. It is proposed that the developer could be requested to investigate the prospects for relocating building 7 for preservation elsewhere within Edinburgh rather than being demolished. This would avoid the loss of a listed building in good repair. If this is judged to be feasible, The City Strategy and Economy service would be able to assist with identifying alternative locations.*

*It is recognised that much of the debate around the development to date has been centred on the aesthetics of the additions to the building. It is suggested that the following considerations should be noted:*

*- The FRHS complex is currently dilapidated, with significant damage to the building exteriors and some damage to the interiors. The Council currently spends in the region of £250,000 on the complex annually; however, this sum covers only basic maintenance and does not allow for major repair works. Given the pressures on public sector finances, the ability of the Council to meet the costs of maintaining the building indefinitely is questionable. There is therefore a significant risk that, if the building remains in its current status, it will continue to deteriorate. Continuing with the status quo is therefore not considered to be a sustainable approach.*

*- There have been a large number of proposals for the reuse of the FRHS since 1968, none of which have materialised. Many of the proposals have been contingent on securing large-scale grant support from the public sector. The current proposal for the reuse of the FRHS was identified following a European Union-wide tendering exercise during which the current proposal was identified as the strongest of 54 competing proposals. There is therefore a risk that, if the current proposal does not proceed, no credible alternative projects will materialise and the building will not secure the investment necessary to arrest its decline.*

*The FRHS complex is currently closed to the public and has been for the vast majority of its working life. The proposal in question would make 27% of the building accessible to the public, less than might be expected from a museum or other visitor attraction, but significantly more than might reasonably be expected from a school, office or other non-public facing use.*

*- The impact of the redevelopment of the FRHS upon the surrounding area is of relevance. As identified in the Princes Street Development Brief for Block 10, Regent Road is an underutilised area of the city centre. Calton Hill, Jacob's Ladder, and the New Calton Burial Ground are prone to antisocial behaviour. There is therefore a need to attract significant additional footfall to the area to enliven it.*

*It is considered that a full-scale hotel incorporating restaurants, a spa and other attractions is likely to generate this footfall. The FRHS occupies a strategic location between the Edinburgh St James and New Waverley developments and has the potential to catalyse further investment in the surrounding area.*

*The FRHS is one of the 'Edinburgh 12' - 12 strategic gap sites within Edinburgh's city centre identified as having the greatest economic impact. The Edinburgh 12 collectively have the potential to directly support up to 19,000 full-time equivalent jobs. As a development opportunity of international calibre, the FRHS has the potential to attract large-scale inward investment into Edinburgh. There would be a significant opportunity cost attached to any development that did not leverage large-scale investment and yield large-scale gains for the economy.*

### **Scottish Government, Trunk Roads Directorate**

*The comments of the Trunk Road and Bus Operations Directorate (TRBOD) are as follows.*

*The proposed development represents an intensification of the use of this site however the percentage increase in traffic on the trunk road is such that the proposed development is likely to cause minimal environmental impact on the trunk road network. On this basis TRBOD has no comment to make.*

### **SEPA**

*No objection to this planning application. Please note the advice provided below.*

*Advice for the planning authority*

#### *1. Flood Risk*

*1.1 We have no objection to the proposed development on flood risk grounds. Notwithstanding this we would expect Edinburgh Council to undertake their responsibilities as the Flood Prevention Authority.*

#### *Technical Report*

*1.2 The report primarily uses the SEPA flood hazard maps to assess the risk of flooding to the development site. As outlined within the terms and conditions of the maps, these hazard maps should not be used to identify the risk to specific properties but more general areas at risk of flooding. We hold no information to suggest that the site is at risk of flooding but note that it does lie adjacent to the surface water flood outline.*

*1.3 Section 7 of the FRA recommends mitigation measures for the possible risk of flooding, particularly relating to surface water and groundwater flood risk and we are generally supportive of the recommendations. Section 7.5 states that the site lies outwith the risk from the <0.1% annual probability flood zone for groundwater and if there are uncertainties then SEPA should be consulted again. No information has been provided on how this has been determined. Section 5.2.4 highlights that the SEPA groundwater map shows that the site lies outwith the 0.5% annual probably groundwater flood zone which is incorrect. The SEPA groundwater map shows areas where flooding could be exacerbated due to groundwater and there are no flood outlines or probabilities associated with it.*

*It would be for the flood risk consultant to determine the risk from this source and not SEPA, as suggested in section 7.5. We note that groundwater has been identified 1.5m below the lowest basement level. Review of drawing entitled 'Proposed Plans Basement Level' number RHS AL(PL)110, shows that the ground floor will be used for storage, laundry and heating system. Therefore if the applicant and consultant are concerned of groundwater flood risk, it is recommended that measures outlined in section 7.5 of the FRA are considered.*

#### *Caveats & Additional Information for Applicant*

*1.4 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km<sup>2</sup> using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit [http://www.sepa.org.uk/flooding/flood\\_maps.aspx](http://www.sepa.org.uk/flooding/flood_maps.aspx).*

*1.5 We refer the applicant to the document entitled: 'Technical Flood Risk Guidance for Stakeholders' This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from [www.sepa.org.uk/flooding/planning\\_flooding.aspx](http://www.sepa.org.uk/flooding/planning_flooding.aspx). Please note that this document should be read in conjunction with Policy 41 (Part 2).*

*1.6 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from: [www.sepa.org.uk/flooding/planning\\_flooding/fra\\_checklist.aspx](http://www.sepa.org.uk/flooding/planning_flooding/fra_checklist.aspx)*

*1.7 Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.*

*1.8 The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to Edinburgh Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: "Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities" outlines the transitional changes to the basis of our advice inline with the phases of this legislation and can be downloaded from [www.sepa.org.uk/planning/flood\\_risk.aspx](http://www.sepa.org.uk/planning/flood_risk.aspx).*

## *2. Foul Drainage*

*2.1 Foul drainage from the site should be discharged to the public sewerage network. The applicant should consult Scottish Water in this regard. We confirm that it is the responsibility of Scottish Water to ensure that the additional flow arising from this development will not cause or contribute to the premature operation of consented storm overflows.*

### 3. Surface Water Drainage

3.1 The discharge of surface water to the water environment should be in accordance with the principles of the SUDS (Sustainable Drainage Systems) Manual (C697) published by CIRIA.

3.2 Comments from Scottish Water and, where appropriate, the Local Authority Roads Department and the Local Authority Flood Prevention Unit should be sought on the SUDS strategy in terms of water quantity/flooding and adoption issues.

3.3 Surface water drainage from the construction phase should also be dealt with by SUDS. Such drainage should be in accordance with C648 and C649, both published by CIRIA. It should be noted that oil interceptors are not considered SUDS in their own right but are beneficial as part of the treatment train.

### **Network Rail**

*Whilst Network Rail has no objections in principle to the proposal, due to its close proximity to the Calton Railway Tunnels, we would request that the following matters are taken into account, and if necessary and appropriate included as conditions or advisory notes, if granting the application:*

*Any demolition or refurbishment works must not be carried out on the development site that may endanger the safe operation of the railway, or the stability of the adjoining Network Rail structures. The demolition of buildings or other structures near to operational railway infrastructure must be carried out in accordance with an agreed method statement. Approval of the method statement must be obtained from Network Rail's Asset Protection Engineer before development can commence.*

*Construction works must be undertaken in a safe manner which does not disturb the operation of the neighbouring railway. Applicants must be aware of any embankments and supporting structures which are in close proximity to their development.*

*Details of all changes in ground levels, laying of foundations/piling works, and operation of mechanical plant in proximity to the Calton Railway Tunnels must be submitted to Network Rail's Asset Protection Engineer for approval prior to works commencing on site. Where any works cannot be carried out in a "fail-safe" manner, it will be necessary to restrict those works to periods when the railway is closed to rail traffic i.e. by a "possession" which must be booked via Network Rail's Asset Protection Engineer and are subject to a minimum prior notice period for booking of 20 weeks.*

*The developer must contact our Asset Protection Engineers regarding the above matters. We trust full cognisance will be taken of these comments. We would be grateful if Local Planning Authorities would provide a copy of the Decision Notice.*

### **CEC Archaeology**

*Further to your consultation request, I would like to make the following comments and recommendations in respect to this linked applications for planning and listed buildings permissions for the change of use, alterations to and restoration of principal former Royal High School building and pavilions (original Thomas Hamilton-designed school buildings), demolition of ancillary buildings including the former Gymnasium Block and Lodge, new build development, new/improved vehicular, service and pedestrian accesses, landscaping, parking, public realm and other works to create a world class hotel of international standing with associated uses (including publicly accessible bars (public house) and restaurants (Class 3)).*

*The nationally important A-listed Royal High School (New Parliament House) building was designed by Thomas Hamilton and opened in 1829. The school occupied the site until 1968, with a range of buildings being added to Hamilton's original design reflecting the growth and new demands of the school principally as follows; Gate Lodge 1885, Gymnasium 1885 (1894), Luncheon Block 1935 (1948) and the class room Block in 1946. A full history of the school its development is contained within the Heritage Statement produced by Andrew P K Wright in support of this application. Prior to the Royal High School's construction the site occurred on the edge of the medieval burgh of the Canongate. No earlier remains have been recorded from the site, however prehistoric activity on Calton Hill is expected, with prehistoric having been found in antiquity close to this site.*

*Accordingly this application must be considered under terms Scottish Government's Scottish Planning Policy (SPP) and Scottish Historic Environment Policy (SHEP) and also CEC's Edinburgh City Local Plan Policies ENV2, ENV4, ENV7, 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.*

### *Historic Buildings*

*The proposed scheme proposes the demolition four listed buildings namely The Gate Lodge, Gymnasium, Classroom Block and Luncheon Block. Such actions must be considered as clearly having significant adverse impacts upon these listed structures as it would lead to their complete loss. That said the loss of the two 20th century buildings (Luncheon Hall and Classroom Block) in archaeological terms could be seen as acceptable provided that a detailed (level 2) programme of historic building recording (annotated plans and elevations, photographic and written description and analysis) is undertaken prior their demolition.*

*Of greater concern is the loss of the 19th century Gymnasium and in particular the 19th century Gate Lodge given their longer association with the sites former use as a school. In terms of the Gate Lodge its loss may have a greater importance due to its key setting at the entrance to the school. Culturally also this building and the western entrance provided a key backdrop to the pro-Scottish Parliament movement in the 1990's. Similarly if consent is granted for their demolition it is essential that a detailed (level 3) programme of historic building recording (annotated plans and elevations, photographic and written description and analysis) is undertaken of them prior to demolition.*

*The alterations proposed to the main High School building in archaeological terms is considered to have an overall moderate impact, but in places one which may be considered to be significant. Accordingly it is essential that a detailed programme of historic building recording (annotated plans and elevations, photographic and written description and analysis) is undertaken of them prior to and during alterations/development.*

*If approved, the above archaeological historic building surveys will build upon the historic building analysis already undertaken by Andrew PK Wright and others.*

#### *Setting*

*It is clear that the proposed new hotel development, if approved, will significantly alter the current setting of not only The Royal High School but also importantly the adjacent Calton Hill, a Designated Historic Landscape. The construction of the new 'western wing' is of particular concern. By filling in the gap between the Royal High School and Register House this new construction will obscure the important 'natural' landscape character of Calton Hill and its associated monuments from the Canongate and the South. As such this significant impact upon the landscape of Calton Hill could be considered as contra to CEC policy ENV7.*

*It is however considered that that the new buildings proposed to the east of the Royal High School in comparison will have a moderate impact.*

#### *Buried Archaeology*

*The proposals will require significant ground breaking works, principally in regards to the demolition of the proposed of the ancillary buildings and proposed new constructions. Such works have the potential to disturb archaeological remains principally relating to the construction of the Royal High School in the 1820's. The potential for earlier remains surviving on site is considered to be low. It is recommended that in addition to the historic building recording that programme of archaeological work is undertaken during ground breaking works, in order to record, excavate and analyse any significant remains affected.*

#### *Interpretation & Public Engagement*

*Given the significance of the Royal High School to the history of Edinburgh it is essential that this rich heritage is interpreted within the final development. This should be undertaken also in collaboration with a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards) the scope of which will be agreed with CECAS.*

*In consented it is essential therefore that a condition be applied to any consent if granted to secure this programme of archaeological works based upon the following CEC condition;*

*'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic building recording, excavation, analysis, reporting and publication, interpretation & public engagement) 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.*

## **Flood Prevention**

*The applicant has submitted a Flood Risk Assessment and Surface Water Management Plan for the application noted above. The applicant has also confirmed that the proposed discharge rate from the site to the public network is to have a maximum flow rate of 5 l/s to the combined sewer. This is in line with CEC Flood Prevention guidelines based on a 4.5 l/s/ha of impermeable area and an impermeable area of 1.12 Ha.*

*In order to better inform the planning application process further information is required with respect to drainage.*

- 1. Please update the drainage layout (Figure 3) to include references for the manholes so that they can be cross-referenced with the microdrainage calculations requested in point 2. Please also include details of how the flow is going to be attenuated i.e. what diameter of vortex flow control device. Please also show where the green roofs are proposed as these will form part of the drainage system.*
- 2. Please provide microdrainage outputs for all underground pipework including rainfall data, manhole and pipe schedules (to mAOD), pipe surcharge report for all underground pipe connections. The manholes in the calculation should be cross-referenced to the drainage drawing to enable interpretation. The results should include the 30yr, 200 year and 200 yr plus climate change results. Should the model identify flood or flood risk in the system then drawings will be required to indicate where exceedence flow will be directed, how it will be contained within the site and lastly how it will be drained once the event has subsided.*
- 3. In the surface water management plan it states that "SuDS...are not considered essential since the runoff from the proposed development will be discharged to the existing public combined sewer". CEC Flood Prevention request that all new development incorporate SuDS treatment into developments to ensure that the development is sustainable. This treatment should take the form of one level of treatment for roof runoff and two levels of treatment for road runoff. The green roofs proposed will provide sufficient treatment to the roof runoff for the new developments. Any opportunity to treat the existing Hamilton building should be taken whilst new hard-standing drainage should consider porous paving and sub-base treatment to achieve required treatment levels.*

## **New Town + Broughton Community Council (Includes comments from the Regents, Carlton and Royal Terrace Residents Association)**

*We had previously submitted comments to the applicant as a result of the Pre-Application Notification in April/May 2015 (15/00223/PAN). Members of the New Town & Broughton Community Council (NTBCC) visited the former Old Royal High School site and buildings earlier this year to gauge the condition of the main Thomas Hamilton building interior. During these visits and subsequently, NTBCC has engaged with the wider community to gauge their thoughts and opinions on these initial proposals.*

*We are disappointed that the comments NTBCC submitted to the developers as part of the PAN process consistent with the Edinburgh Concordat - have not led to a continued dialogue between NTBCC and the developers. Nor have they been acknowledged or included in the Pre- Application Consultation (PAC) report submitted with the above applications. We fully understand that the applicant may want to solicit additional comments through the PAN process directly via simpler, high level questionnaires but NTBCC endeavours to provide more in-depth community views through our representations. We also have included input from the Regents, Carlton and Royal Terrace Residents Association Terrace who live adjacent to the proposed redevelopment and would be directly impacted by the development.*

*The proposal outlined is for the development of the site into a prestigious hotel. To successfully develop a hotel of this nature, the developers continue to state that the hotel must be of sufficient size, and that a significant range of associated facilities are a necessity to ensure that the development would be commercially viable and attract the necessary third party funding to enable the development to be progressed.*

*NTBCC remains supportive of a new, sustainable use for the building, given its deteriorating condition. NTBCC also accepts that to accommodate any new use in the listed building, change and alteration on the site will be required. The key determining issue is whether the building and the site can accommodate the changes and the quantum of development required for a prestigious hotel without detrimental impact on the building, its setting and the wider conservation area, and the Outstanding Universal Value of the World Heritage Site.*

*It is worth stating that NTBCC's clear preference has always been that a more aesthetic, educational and intellectual use could be found for this site, befitting the Old Royal High School's history and culture.*

*Whilst NTBCC fully understands that the applications as listed above would need to be determined versus retaining the status quo, unusually, in this case, there is an alternative, parallel proposal being developed which, although at an earlier stage of development and perhaps hampered by premature commercial arrangements agreed to by the City of Edinburgh Council, would appear to be offering a more sympathetic and less intrusive development. Whilst this consideration may not be material in strict planning terms, from a community standpoint, the emergence of a viable, more sympathetic alternative is very relevant.*

*Regarding the specific applications above and considering the architectural changes, we would acknowledge that there some welcome improvements in the latest proposals versus the plans presented initially as part of the PAN process.*

*We welcome the recognition that attempting to impose the requirements of a prestige hotel on the front of the building (such as a grand staircase, window and door openings and conservatories), is to ignore why the building is recognised as Scotland's finest example of Greek revival architecture. We are therefore supportive of the removal of these unwelcome and barbaric plans for interventions on the main Thomas Hamilton building façade in this proposal or others that may follow. We acknowledge the improvements in architectural style being proposed for the hotel wings being shifted away from the main building to allow the High School more of the space and importance it deserves.*

*We present more specific comments on the key changes being proposed.*

#### *1) Proposed Demolition of Buildings*

*We accept that demolition of some of the later building additions to the site may be necessary. We could support demolition of the single storey luncheon hall and classroom block which it could be argued already detract from the main Hamilton building. These buildings may well meet the requirements of SHEP in terms of the "Importance of the Building" - where the buildings in question may not be of sufficient interest to merit listing in their own right. In addition, the demolition of the gymnasium building may be the price to pay for facilitating a sustainable, long term future for the remaining buildings, under the "Wider Public Benefits" SHEP test where the retention of the building may prevent wider public benefits flowing from the redevelopment of a site. This clearly would then provide some scope for new development within the site.*

*However, the proposed demolition of the entrance lodge, although this building is not original, is very much regretted and in our view, does not meet any of the required SHEP tests. It makes a significant contribution to the vista at the foot of the access road to Calton Hill. It is currently occupied so the condition of the building is not beyond repair. It occupies a small floor area to the west of the site and therefore its demolition is not necessary for viable economic development of the site and the wider public benefits would be achieved by retaining this building not demolishing it. We believe that new, viable, economic uses could be found for this building preserving the viewpoint from Waterloo Place towards Calton Hill - either by being incorporated into a new development or a separate, standalone function - perhaps as Calton Hill Visitor's Reception / Interpretation area as previously mooted.*

*We therefore however question whether there has been adequate demonstration as to how the scale of the proposed demolitions would be justified in relation to the SHEP tests, which states that 'There is, therefore, a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting'.*

#### *2) Setting of Listed Building*

*We believe the proposed hotel development, in particular the redevelopment of the western playground, would have a significant adverse impact on the setting of the Category A listed former Royal High School, including views to and from the main building and associated structures (pavilions, screen walls, gateways and railings) which all contribute to the present integrity of the original concept. The proposed extensions to the listed building, by their height, scale and massing, would in our view dominate and overwhelm the listed building, challenging its primacy on the site and diminishing significantly the building's status as an internationally- acclaimed example of Greek revival architecture, contrary to policy Des 11.*

*The hotel development as proposed is therefore contrary to both LDP policies Env 3 and Env 7 because the scale of the proposals will have a negative impact on the setting of the main listed building, blocking key views of the Thomas Hamilton Royal High School, the Nelson Monument and the landscape of Calton Hill.*

*In addition, the proposal blocks key views of the school and of the remaining neighbouring buildings and views from within the site to the city and the Holyrood Park, damaging the building's setting and sense of place (contrary to LDP policy Des 10). The relationship of the building to its surrounding landscape is fundamental to its setting and its architectural philosophy. The former Royal High School and Calton Hill both sit within the New Town Conservation Area and the buildings within this wider landscape form a significant element of the character and appearance of the conservation area. The landscape character of Calton Hill is significant in its own right, reflected by its SSSI status and its inclusion in the New Town Gardens Historic Garden / Designed Landscape inventory.*

*This interaction of landscape and architecture is what makes Edinburgh unique. This did not happen entirely by chance, Thomas Hamilton took full cognisance of the Calton Hill setting for his magnificent Greek revival temple of learning, the building that more than any other realises Edinburgh's ambition to be the Athens of the North. The resultant stunning set piece, topped by the unfinished National Monument, is a work of art and one appreciated by tourist and residents alike and in many ways encapsulates the Outstanding Universal Value of The Old and New Towns of Edinburgh World Heritage Site. Introducing large new structures into this set piece, be they uncompromising slabs as initially proposed, or stepped back blocks reminiscent of a Inca temple as now proposed, would unacceptably diminish this heritage.*

### *3) Alterations*

*Regarding the proposed interventions to the remaining listed building, NTBCC accepts that alterations will be required for any new use. However, such changes should be sensitive, sympathetic and above all necessary. Clearly the building(s) will need to evolve and change and it is recognised that some of the interventions would be necessary to improve connectivity both within and external to the building(s) consistent with the new use, including that of a hotel. However, despite the developer dropping the majority of the initial proposed interventions on the main southern façade from the final scheme as presented in this application (the reduction of which we strongly support), some alterations are retained which although it could be argued that these return the main Thomas Hamilton building to its original design we remain concerned that the unblocking of the currently blind door on the southern façade from the main debating chamber will spawn additional architectural features on the main façade, including the so-called winter terrace as the design progresses as clearly this is a key viewpoint that the developers want to make available to their hotel patrons. We are encouraged that the architect would seem to have a clear understanding of the sensitivity regarding modifications to other areas of the southern façade.*

*However, the Heritage Statement (part 3) states that the interventions which had been proposed to the external fabric at the early design stages have been reduced to the minimum necessary for operational reasons which we acknowledge - however, this is qualified by the statement that the servicing strategy is dependent on access from Regents Road which then requires modifications to the east pavilion frontage we do not support. We note that the Edinburgh Urban Design Panel report does state that "Consideration should be given also to exploring alternate servicing strategies for the hotel without creating an opening through the plinth". Again, it would seem that the constraints of the existing building are at odds with the proposed use, requiring more significant interventions on the building that is desirable.*

#### *4) Scale of Development*

*The scheme involves significant new development within the site, consistent with the aims of creating a prestigious hotel. It is our understanding that the commercial viability of the hotel development has, as a key requirement, a minimum floor space that has been set arguably above the maximum that the current site can support. Therefore, despite various options being explored as to how best to fit the necessary scale within the site, for example - by a higher building on the eastern terrace, we remain firmly of the opinion that the quantum of development required by a hotel of this nature cannot be accommodated on the site in a manner that achieves an acceptable setting in this location irrespective of the architectural style proposed.*

*The site is not large for a development of this nature and the location for any new development is restricted with little scope to push development significantly back from the listed building without prejudicing other aspects of the overall vista.*

*We note and support Historic Scotland's view that the western terrace should remain undeveloped so as to afford a side view of Hamilton's building. Both the current proposal for the development on the western terrace and that presented at the March Public Exhibition would destroy the view of the Royal High School site and Calton Hill and, in our view, severely compromise the current spatial arrangement between all of these buildings, including St Andrews' House to the south.*

*Whilst it is acknowledged that the stepped backed blocks in muted colours designed to blend into the hillside crowd the Hamilton building less, they draw attention to the problems of accommodating a hotel of the size required to be economically viable on the site, as the stepping back leads to an overhang at the western end which ruins Hamilton's oblique approach from the city centre.*

*We believe that the proposed new development on the western terrace is far too prominent and visible within the site context, the setting, landscape, architectural composition of the listed building and key views. In summary, the proposal is neither respectful of nor compatible with the listed building (contrary to LDP policy Des 11) and, as such, is both unviable and unacceptable.*

#### *5) Proposed Justification*

*NTBCC acknowledges that a key benefit of the proposal and main justification is in preventing further damage to the existing buildings from the less than adequate maintenance over the past few decades by the current owner of the buildings.*

*Given that there are other potential schemes and uses being developed, we therefore do not accept the primary justification for accepting this scheme. Edinburgh can, and should do better. Waiting in the wings is a credible proposal to relocate St Mary's Music School to the site, backed by the Dunard Trust, which proposes to renovate the Thomas Hamilton building as a teaching and performance space, more befitting for a former school building, where the public will be able to enjoy regular concerts.*

*The applicant has put forward a comprehensive assessment of the economic impact the hotel development would have. Any development that delivers additional employment in Edinburgh and generates financial benefits for the city is to be welcomed in principle. Whilst we would acknowledge the expertise of Oxford Economics in financial assessments of such schemes, we would make the following comments.*

*a. The economic impact study presents the benefits on a 'gross' rather than 'net' basis i.e. it does not attempt to compare the benefits generated by this scheme to an alternative. Typically an application is being assessed in isolation - however, we would argue that in this case a more meaningful assessment would be to compare the benefits of the use of the building in hotel use vs. a music school i.e. on a nett basis. We believe that this would significantly reduce the estimated benefits.*

*b. As far as we can ascertain, the assessment also assumes that there is no impact on the occupancy of other high-end hotels within Edinburgh i.e. the perceived benefits are all additional because it is assumed the patrons who are expected to use this prestigious hotel would otherwise not visit Edinburgh. We do not believe this assumption to be wholly correct, given Edinburgh's acknowledged attractiveness as a tourist destination.*

*c. Furthermore, there has been a significant increase in hotel beds across the spectrum in Edinburgh with many more hotels consented but not yet built.*

*Given the points raised above, whilst an exclusive hotel serving patrons could bring economic benefits to Edinburgh, we believe that the relatively small increase in GDP for Edinburgh could be far better achieved via other higher valued-added routes rather than this (in our view, inappropriate) development of an iconic building which does not involve compromising key elements essential to the city's character, a character of critical importance to its attractiveness as a tourist destination (and as a place to live and work).*

#### **6) Public Access**

*We share the Cockburn Association's assertion stated in their PAN response that that a hotel is not a public building; access depends on management policies, which can change. Although the development team have put forward suggestions on how some of these aims could be achieved within the development proposed, this will not be a public building. The presumption will be that visitors will be consumers. Whilst the current plans state that an exclusive hotel could bring significant economic benefits to Edinburgh, NTBCC is unclear that this hotel development would bring enough to the wider Edinburgh community versus the select few.*

## *7) Sustainability*

*We note that the proposal is for a high end, prestigious hotel. However, from a planning perspective, it is not possible to guarantee that this would be the case even by applying strenuous conditions. Although we understand that a major, high-end hotel operator has expressed strong interest in the development, we are concerned that the commercial viability of the proposed prestigious hotel has not been demonstrated and may not be achieved, by which time the current buildings would have been either modified or worse, demolished with (in our view) inappropriate additions. This again leads NTBCC to not support the proposed, significant and irreversible changes contained within this application.*

*We do not share the belief nor support the assertion that the hotel scheme offers the only solution to preserving Thomas Hamilton's masterpiece for posterity.*

*We remain very concerned that the proposal for the site to accommodate a prestigious hotel, of the scale specified will have a detrimental impact on the special architectural and historic interest in the listed building from the new development.*

*NTBCC believes that the quantum of development which the building and site can accommodate without detrimental impact on the building, its setting and the wider conservation area and World Heritage Site is significantly less than the proposed development.*

*In summary, NTBCC have no alternative but to formally object to this scheme based on the current proposal.*

*We remain encouraged, however, that the proposal has spawned a useful and overdue debate and discussion in the wider community on how best to safeguard this at risk building. The process has also encouraged another viable option to be proposed both for the building and the wider context of revitalising and reenergising this forgotten part of the city centre including Calton Hill.*

## **CEC Environmental Assessment**

*The proposed development is bounded to the south and west by Regent Road (A1) and to the east by residential premises. There are also residential premises and student halls to the south of the development, beyond the A1 road. Environmental Assessment raised several issues which required to be addressed before we could support the application. This included noise, local air quality and local residents had raised concerns with light pollution which was also investigated.*

### *Noise*

*Environmental Assessment raised concerns regard the potential noise impacts this proposed development may have on nearby residential amenity. Environmental Assessment recommended that a noise impact assessment should be submitted to support the application. The areas requiring attention relevant to the noise and vibration are demolition, construction and operational noise. The applicant has submitted a supporting noise impact assessment which has addressed all the concerns raised.*

## Construction

*The applicant has included details of the potential risk of likely effects from construction during activities that involve heavy demolition and piling. The site is located on hard bedrock (below existing buildings), therefore there are potential impacts of noise and vibration arising during excavation and breaking.*

*Construction noise and vibration is normally addressed and regulated under The Control of Pollution Act 1974 which gives City of Edinburgh Council Environmental Health Officers the powers to control noise and vibration pollution from construction sites, using primarily two mechanisms: British Standard 5228 Code of practice for noise and vibration on construction and open sites. Under the above primary legislation the site working hours are regulated which allows noisy construction works to take place only from Monday to Saturday between 07:00 and 19:00.*

*Any works requiring to be undertaken outside the daytime hours will require permission from the City of Edinburgh Council as specified in the Control of Pollution Act 1974.*

*With regards to rock excavation, the applicant has suggested two possible methods for the site: 'Precision Controlled Rock blasting' and 'Chemical Rock breaking'. Environmental Assessment is satisfied that either method can be used and regulated under the Control of Pollution Act 1974 to ensure disturbance is minimised. The applicant has further advised that it is envisaged that rock removal will be mainly be removed through hand tool breakout techniques. Where the rock is further away from existing foundations, local removal of the rock face through drilling and chemical splitting may be possible. The applicant has confirmed that all techniques adopted will ensure that vibrations at the existing building are kept below the BS 7385 Part 2 "Evaluation and measurement for vibration in buildings" levels.*

*The applicant has highlighted that a significant effect may be identified on Regent Terrace. During the daytime there are predicted exceedances of the assessment criteria as a result of structural demolition and works related to erection of structures. This has been based on a worst case scenario, and will be over a short period of time. Therefore Environmental Assessment is satisfied that it is unlikely to breach the British Standards levels and that the applicant will ensure any impacts are minimised.*

*The applicant has also assessed the likely impacts during construction phase caused by the increase of construction Heavy Good Vehicles in the nearby road network. The impacts have been identified as not significant and Environmental Assessment is satisfied with this conclusion. Furthermore the applicant has assessed potential cumulative noise and vibration effects from other developments expected to coincide with the proposed development including the St James Centre no significant effects are predicted and Environmental Assessment concurs with this conclusion.*

*An informative will be recommended regarding construction noise.*

## Plant

*Most of the building services will be in the basement plant room with several additional plant spaces along the lower ground floor. There will also be an external chillers compound at the east end of the building and potentially kitchen supply/extract plant on the roof of the existing school, on either side of the central roof dome.*

*The assessment of mechanical services plant is based on the intrusive noise within nearby residential properties. The applicant has advised that it will be able to achieve the required noise criteria of NR25 within the neighbouring residential properties allowing for their windows to be open. It is not uncommon for developers not to have the specific details of all the plant. Mitigation of plant noise is straightforward and it is recommended that a suitably worded planning condition defining allowable noise limits (NR25).*

#### *Operational Noise*

*Sound insulation performance of the building envelope (including glazing and ventilation) for entertainment spaces, such as ballroom or bars, are the mostly areas where noise breakout may occur. Environmental Assessment has advised that noise breakout must not be audible within any of the nearby residential properties. The applicants noise impact assessment has addressed this issue and provided details on how the development will be designed to ensure that breaking-out noise levels meet the strict criteria.*

*Environmental Assessment is satisfied that the worst case scenario has been considered in the noise impact assessment. The entertainment spaces (i.e. ballroom) is enclosed within other rooms and so breaking-out noise would be reduced by the attenuation provided by internal partitions and the external building envelope. Partitions will have a performance of  $R_w=40\text{dB}$  and doors have been assessed as being open (this is demonstrating worst case as doors will be closed). In order to achieve inaudibility in closest residential property the outer partition performance should be at least  $R_w=44\text{dB}$  with no open windows facing the residential properties. Environmental Assessment accepts the findings of this report and shall recommend conditions to ensure amenity is protected.*

#### *Deliveries*

*The applicant has advised that a service management plan will be prepared by the operator that will detail how the deliveries will function, however based on the existing use Environmental Assessment have no concerns regarding noise from the proposed deliveries.*

#### *Local Air Quality*

*It has been highlighted to the applicant that the site is located adjacent to the City Centre Air Quality Management Area which has been declared for exceeding Nitrogen Dioxide levels, caused mainly by traffic emissions.*

*Planning Advice Note (PAN) 51: Planning, Environmental Protection and Regulation 3 sets out the Scottish Executive's core policies and principles with respect to environmental aspects of land use planning, including air quality. PAN 51 states that air quality is capable of being a material planning consideration where a large scale proposal is inside, or adjacent to, an AQMA.*

*The planning system has a role to play in the protection of air quality, by ensuring that development does not adversely affect air quality in AQMAs or, by cumulative impacts, lead to the creation of further AQMAs where air quality standards are not being met, and for which remedial measures should therefore be taken.*

*Breaches of air quality standards in the city's AQMAs are largely due to road congestion. The Council's Air Quality Action Plan contains a range of measures to reduce emissions both within these areas and beyond. Reducing the need to travel and promoting the use of sustainable modes of transport are key principles identified in the second Edinburgh Local Development Plan (LPD). The LDP acknowledges that growth of the city based on car dependency for travel would have serious consequences in terms of congestion and air quality. An improved transport system, based on sustainable alternatives to the car is therefore a high priority and continued investment in public transport, walking and cycling are central tenets of the City of Edinburgh Council's Local Transport Strategy 2014-19.*

*The City of Edinburgh Council's Parking Standards for Development Control document, dated December 2009, is used to determine the appropriate level of car parking for new developments. It is noted that the development does not propose introducing any additional parking but will have areas for coach and taxi drop off and collections.*

*Notwithstanding this the applicant does propose installing a large 2.8Mw gas powered energy plant. Energy Plant of this size can have an adverse impact on the background levels of NO<sub>2</sub> if not mitigated in the form of secondary abatement technology. The applicant has confirmed that they will install secondary abatement technology most likely in the form of Selective Catalytic Reduction system. The applicant has demonstrated compliance with the Clean Air Act with supporting chimney height calculation ensuring the correct sized chimney is consented. As the applicant is including a taxi drop-off point they must consider the provision of rapid electric vehicle charging points for taxis. At least one Charging outlet should be of the following standard:*

*70 or 50kW (32 Amp) DC with 43kW (32 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.*

*An informative will be recommended for construction dust.*

#### *Light Pollution*

*Neighbouring residential properties have raised concerns with possible light pollution from the proposed development. The applicant has highlighted that there will be only soft lighting located on the facades closest to the residential properties. There may be some light spillage from the grounds already and there is now a possibility of a planning gain from what the applicant is proposing.*

*Therefore Environmental Assessment offers no objections subject to the following conditions;*

1. The following noise protection measures to the proposed hotel, as defined in the Environmental Statement - Volume 3 Noise and Vibration' report (Ref R-6558-MI1-RGM), dated 3 September 2015:

- Glazing units with a minimum sound reduction level of  $R_w=44\text{dB}$  with no open windows facing the existing residential properties shall be installed for the external doors and windows of the entertainment spaces.
- Internal partitions surrounding the entertainment space with a minimum sound reduction level of  $R_w=44\text{dB}$  shall be installed.

shall be carried out in full and completed prior to the development being occupied.

2. Prior to occupation of the development, details demonstrating that noise from all plant complies with NR25 shall be submitted for written approval by the Head of planning and Building Standards

*Details required*

Prior to occupation of the development, details demonstrating that noise from all plant (including air source heat pump system) complies with NR25 within the nearest residential property (with window partially open for ventilation purposes) shall be submitted for written approval by the Head of planning and Building Standards.

3. Charging outlet should be of the following standard shall be installed at taxi rank: 70 or 50kW (32 Amp) DC with 43kW (32 Amp) AC unit. DC charge delivered via both JEVS G105 and 62196-3 sockets, the AC supply by a 62196-2 socket. Must have the ability to be de-rated to supply 25kW to any two of the three outlets simultaneously.

4. All boilers must be fitted with secondary abatement technology.

*Construction noise informative*

To minimise the level of noise to which sensitive receptors will be exposed, the construction work will be conducted in accordance with a Code of Construction Practice (CoCP).

*These measures will include the following:*

- Careful selection of plant and construction methods. Only plant conforming to relevant national, EU or international standards, directives and recommendations on noise and vibration emissions

*should be used.*

- Design and use of site enclosures, housing and temporary stockpiles, where practicable and necessary, to provide acoustic screening at the earliest opportunity

- Where practicable, doors and gates should not be located opposite occupied noise-sensitive buildings. The mechanisms and procedures for opening doors/gates will minimise noise, as far as reasonably practicable

- Choice of routes and programming for the transport of construction materials, spoil and personnel

- Careful programming so that activities which may generate significant noise are planned with regard to local occupants and sensitive receptors.

- All vehicles and mechanical plant shall be fitted with effective exhaust silencers and shall be maintained in good and efficient working order and operated to minimise noise emissions
- All compressors and generators shall be 'sound reduced' models fitted with properly lined and sealed acoustic covers which shall be kept closed whenever the machines are in use, and all pneumatic percussive tools shall be fitted with mufflers or silencers of the type recommended by the manufacturers
- All machines in intermittent use shall be shut down in the intervening periods between works or throttled down to a minimum. Lorry engines will be switched off, as soon as practicable, when vehicles are stationary
- Noise emitting equipment which is required to run continuously shall be housed in a suitable acoustic enclosure.
- Temporary noise barriers will be used to reduce noise levels where appropriate and practicable. Such measures can be particularly appropriate for stationary or near-stationary plant such as pneumatic breakers piling rigs and compressors. Barriers should be located as close to the plant as possible and, in order to provide adequate attenuation and should have a mass per unit area of at least 7 kg/m<sup>2</sup>
- Plant and equipment liable to create noise and/or vibration whilst in operation will, as far as reasonably practicable, be located away from sensitive receptors and away from walls reflecting towards sensitive receptors
- Materials for night-time working shall be delivered, where practicable, during normal hours of working and be placed as close as possible to the work area for which they are required
- Where reasonably practicable, fixed items of construction plant shall be electrically powered in preference to combustion engine driven
- Doors on plant and equipment will be kept closed

*It should be noted the local authority has powers under the Control of Pollution Act (1974) to control noise from construction sites.*

### *Construction Dust Mitigation*

1. *All mobile plant introduced onto the site shall comply with the emission limits for off road vehicles as specified by EC Directive 97/68/EC. All mobile plant shall be maintained to prevent or minimise the release of dark smoke from vehicle exhausts. Details of vehicle maintenance shall be recorded.*

2. *The developer shall ensure that risk of dust annoyance from the operations is assessed throughout the working day, taking account of wind speed, direction, and surface moisture levels. The developer shall ensure that the level of dust suppression implemented on site.*

*adequate for the prevailing conditions. The assessment shall be recorded as part of documented site management procedures.*

3. *Internal un-surfaced temporary roadways shall be sprayed with water at regular intervals as conditions require. The frequency of road spraying shall be recorded as part of documented site management procedures.*

4. *Surfaced roads and the public road during all ground works shall be kept clean and swept at regular intervals using a road sweeper as conditions require. The frequency of road sweeping shall be recorded as part of documented site management procedures.*
5. *All vehicles operating within the site on un-surfaced roads shall not exceed 15mph to minimise the re-suspension of dust.*
6. *Where dust from the operations are likely to cause significant adverse impacts at sensitive receptors, then the operation(s) shall be suspended until the dust emissions have been abated. The time and duration of suspension of working and the reason shall be recorded.*
7. *This dust management plan shall be reviewed monthly during the construction project and the outcome of the review shall be recorded as part of the documented site management procedures.*
8. *No bonfires shall be permitted.*

#### **Environmental Assessment, Further comments 3 December 2015**

*In regards to the following comment in the Environmental Assessment consultation we would like to clarify that there will not be a traditional chimney stack installed the energy plant emissions will emanate via low level louvers . The term chimney is used in the Clean Air Act and the emissions calculation is a 'Chimney Height Calculation'. The applicant has carried out the chimney height calculation and the proposed energy extract system complies with the Clean Air Act therefore the 'correct sized chimney has been consented' in reality this is a louver.*

#### **Police Scotland**

*. The Police have engaged with the developers and discussed the project by telephone and have the following recommendations to make:*

*Request for parking restrictions to be enforced on Regent Road, in front of the site - Police would support a restriction on the north carriageway (nearest the site).*

*Calton Hill entrance/steps - Police advise that this access point should be removed as it compromises security. If there is a desire/requirement to retain the walkway then the gate should be access controlled to ensure unauthorised visitors could not readily access the building.*

*Lighting - There should be a detailed lighting strategy for the whole site. It is essential that this provides uniform white light to a level where facial recognition is possible.*

*CCTV - There should be a detailed Operating Requirement to ensure maximum coverage, desirable locations and standards of cameras/system.*

*Glazing - Laminated glass should be fitted as standard. If this is cost prohibitive for the whole site then laminate glass should be fitted in all accessible windows and doors.*

*Criminality - It is anticipated that development of this derelict site will enhance the safety of this area. Under this proposal, natural surveillance and presence would be achieved around the clock, which will deter criminals from operating in the area. Historically, there was a moderate crime profile around the site, which included anti-social behaviour in relation to both individuals and vehicles. This trend is no longer prevalent and this site being developed should prevent any reoccurrences. It would be anticipated that a constant presence on this site would assist in the prevention of crime and disorder in the surrounding vicinity.*

## **CEC Estates**

*Duddingston House Properties / Urbanist Hotels (henceforth known as the Applicant) has submitted a number of papers in support of their decision making process leading to the planning application for a hotel of international standing at the site of the former Old Royal High School. Collectively these reports are intended to prove the qualitative and quantitative reasons for situating the hotel in this location, for seeking the demolition of part and the massing / scale proposed. The reports are as follows:*

- Assessment of Economic Viability of Alternative Uses (DTZ)*
- Luxury Hotel Market Analysis (HVS)*
- Hotel Viability Analysis (HVS)*
- Economic Impact Assessment (Oxford Economics)*
- Building Fabric Condition & Restoration Cost Analysis (Thomas & Adamson / Bluestage Property)*
- Review of Past Proposals for the Site (Lodestar)*
- Review of Hotel Opportunities in Edinburgh (Colliers)*

*Due to their involvement in the sale, City of Edinburgh Council Estates team has set up an ethical wall between staff giving advice to the Planning Officer and those involved in the sale. Jones Lang LaSalle (JLL) has also been appointed to undertake the analysis of the DTZ report on the economic viability of alternative uses on behalf of the Estates team to ensure a greater level of clarity.*

*Below is a summary of the reports provided, highlighting where there has been confirmation from either Estates or their appointed consultants. There has not been an assessment of the Economic Impact Assessment (Oxford Economics) as this will have been undertaken by colleagues in Economic Development in their role as consultees on major applications. In addition, we understand that the Planning Officer has undertaken their own review of the HVS, Colliers and Lodestar reports.*

*Assessment of Economic Viability of Alternative Uses (DTZ, incorporating Building Fabric Condition & Restoration Cost Analysis by Thomas & Adamson)*

*Since the proposed development includes plans to demolish the Lodge House and the gymnasium / classroom block, both of which are listed, this action requires justification in the context of the criteria set by Historic Environment Scotland in its Scottish Historic Environment Policy (SHEP). The SHEP states a general presumption against demolition of a listed building but also includes a series of tests by which demolition may be justified. One of these criteria is that demolition may be permitted where it can be clearly demonstrated that every effort has been made to retain the structure and where demolition of the building is essential to deliver significant benefits to economic growth or the wider community.*

*The DTZ report provides an evidence base to show whether alternative developments are potentially viable in an attempt to show the applicant has met the above criteria. The methodology in the report is as follows:*

- 1. Investigate a number of alternative approaches to reuse of the site encompassing a range of uses for the former Royal High School site to evaluate realistic development scenarios and their resultant residual valuations;*
- 2. Encompass a process to consider retaining as many of the listed buildings on site as possible and then to assess the effect of sequential development (with the exception of the main building which needs to be included within all options), to ascertain the impact on residual values and project viability;*
- 3. To provide summary appraisals for each use and scenario based on layouts provided by the Applicant following a brief for each use.*

*The report considers the following alternative uses:*

- Boutique Hotel;*
- Budget Hotel;*
- Serviced apartments;*
- Care Home;*
- Residential ;*
- Student Residential;*
- Office;*
- Museum.*

*For each alternative use they have appraised three scenarios, which are as follows:*

- 1. no demolition, keeping all development within the footprint of the existing buildings;*
- 2. some demolition with the development of some new buildings on a section of the site;*
- 3. Increased demolition with increased new build development.*

*As previously mentioned, Estates appointed JLL to critically review DTZ's methodology and findings. The JLL report (made available to the Planning Officer) confirms the approach undertaken by DTZ is, on the whole, sound. For the commercial uses, traditional development appraisals have been calculated to generate a residual land value. There is a difference in approach to Care Home valuation methodology, although JLL confirm that this makes no material difference to the findings within the report. Noting this exception, JLL confirm the findings of the DTZ report. These findings are as follows:*

- For the commercial uses, traditional development appraisals have been calculated to generate a residual land value;*

- *The appraisal outputs for all commercial uses under all three scenarios produce a negative land value. This indicates that employment development for these uses at the 3 densities proposed is not commercially viable;*
- *Further appraisals have then been undertaken at a higher density of development. Again, three scenarios have been assessed. The lowest level of increased development comprises an additional floor on the buildings to the east end of the site. The second scenario adds in accommodation on an additional level to both east and west buildings and the final scenario includes development of the current car parking site to the west side of Building 1;*
- *The appraisal outputs for offices and care village remain negative, even on the increased density of development;*
- *Student residential becomes marginally profitable with one additional floor to the east building;*
- *Hotel becomes profitable with an increased floor to both east and west buildings together with construction of a further hotel on the car park;*
- *The residential scenario analysed has no additional scope for development on the east and west buildings but is profitable with development of the car park;*
- *The public use analysis shows a marginal negative outlay with the most increased level of additional development;*
- *In addition to the appraisal outputs a qualitative assessment has also been undertaken. It is DTZ's opinion that the site is not well suited to office development because of the nature of the buildings that could be constructed;*
- *Demand for student residential developments in the city is intense and the site would be competitively pursued. However, it may not offer best economic value;*
- *While hotels are potentially viable, the nature of buildings may not suit the budget / 3\* market appraised which drives the highest potential value. Furthermore, the boutique hotel that occupies Building 1 is unlikely to be commercially viable given the limited number of bedrooms that can be created as part of the conversion;*
- *Residential could potentially be profitable. However, the City of Edinburgh Council is only offering the site on a long leasehold basis. The ownership nature will have a significant adverse impact as it may not be possible for individual owners to mortgage any properties built;*
- *The care village concept is also limited by the same ownership arrangement. There is scope for a public organisation to use the site, but the configuration of buildings and particularly Building 1 will limit the nature of the occupier. It may be difficult to identify a potential user capable of optimising the space within the site. Furthermore, redevelopment of the site for a public use would require funding. Funding is available from both public and private sources.*

*It is beyond the scope of this report to comment in detail on private funding but public funding is generally limited, competitively bid for and there are no guarantees that individual projects will secure funding;*

*- The site has a history of public and civic interests which have failed to progress for a number of reasons including adaptation of the buildings to meet operational requirements and funding.*

*- Having regard to the appraisals and qualitative outputs, aside from the use proposed by the Applicant, it is DTZ's opinion that the only truly viable alternative use is student residential. This would require conversion of Buildings 1, 5 and 6 into a mixture of bedroom and central service accommodation. The buildings to the east and west end of the site would be demolished with new build blocks constructed in their place;*

*- If the City of Edinburgh Council were to adopt a different ownership structure then residential may also be viable at an increased development density;*

*- For all uses to be viable, demolition of the buildings to the east and west of the site together with substantial new build would be required.*

### **CEC Flood Prevention**

*Further to the information submitted by the applicant on the 26th November 2015 all of Flood Prevention's concerns regarding flood risk and surface water management at the site have now been addressed. As such we have no further comment on this application.*

### **City Transport**

*No objections to the application subject to the following being included as conditions or informatives as appropriate:*

*1. Consent should not be issued until the applicant has entered into a suitable legal agreement to:*

*a. Contribute the sum of £224,600 to the Edinburgh Tram in line with Council policy (based on 147 room hotel in Zone 3);*

*b. Contribute the sum of £2,000 to promote a suitable order to redetermine sections of footway and carriageway as appropriate;*

*c. Contribute the sum of £2,000 to promote a suitable order to amend the controlled parking zone order as it applies in to Regent Road;*

*2. In general terms the changes to the adopted roads are considerable to be acceptable. However the applicant should be advised that:*

- a. *Detailed drawings to be submitted and agreed in writing by the Head of Planning prior to commencement on site. The applicant should note that this will include details of lighting, drainage, Sustainable Urban Drainage, materials (including a survey of existing materials and their retention), structures, layout, specification, etc. Particular attention should be paid to the design of the junctions at Calton Hill and Regent Terrace, and to ensuring that levels are suitable for pedestrians, wheel chair users, prams and push chairs;*
- b. *The necessary orders referred to above to be in place prior to commencement of work on site;*
- c. *The proposed layout is to include suitable uncontrolled pedestrian crossing points and to include an uncontrolled crossing point in the vicinity of the front entrance;*
- d. *The crossing point referred to in 2.c. above to include suitable ducting to permit conversion to a controlled crossing if necessary;*
3. *All works to Regent Road to be at no cost to the Council and to the satisfaction of the Head of Planning;*
4. *For the avoidance of doubt, the Council does not support or approve any reduction in parking provision on the south side of Regent Road at this time (see note a below);*
5. *The applicant should be informed that prior to carrying out any works to the footway or carriageway, a roadwork's consent must be applied for and secured. The layout etc. referred in 2. must be agreed prior to application for roadwork's consent;*
6. *Any gate or doors must open inwards onto the property;*
7. *All disabled persons parking places should comply with Disabled Persons Parking Places (Scotland) Act 2009. The Act places a duty on the local authority to promote proper use of parking places for disabled persons' vehicles. The applicant should therefore advise the Head of Transport if he wishes the bays to be enforced under this legislation. A contribution of £2,000 will be required to progress the necessary traffic order. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2002 regulations or British Standard 8300:2009 as approved by the Head of Planning.*

Notes-

- a) *The application was submitted originally with all on street parking on Regent Road, over the entire length of the building frontage, removed. When the family friendly cycle lane along Regent Road is implemented consideration will be given to removal of the south side spaces.*
- b) *The 'future proofing' the applicant has shown for a two way segregated cycle lane on the south is feasible. However this does not commit the council to provide the cycleway in this form. It may be, for example, that a segregated single lane east-bound on the north side of Regent Road and a segregated lane west-bound on the south side is considered preferable.*

## **Edinburgh Urban Design Panel Report - 6 May 2015**

### *Executive Summary*

*The proposal for review is the redevelopment of the former Royal High School and grounds, for conversion to a "world class hotel of international standing".*

*The proposal is being reviewed through the A+DS Design Forum and it is at the request of the Panel that it also be reviewed by the Edinburgh Urban Design Panel. The Panel welcomes the opportunity to review the proposal.*

*This is a complex and highly sensitive site and setting and there are significant design challenges. In essence, the Panel's response is twofold:*

- *Firstly, there are significant concerns that the quantum of development proposed in order to achieve a "world class" hotel on the site cannot be delivered without exceptional and significant harm to the character and setting of this unique and nationally important historic building and landscape setting.*

- *Secondly, that the change in design approach towards a "landscape based" form, materials and detailing, and the pulling back of the proposed newbuild from the main Hamilton building is welcomed.*

*A number of design development recommendations are made, in the context of:*

- *Encouraging the development of the best possible scheme for the proposed conversion of the site to hotel use, and*

- *Identifying supporting information that should be submitted with the planning application to enable an informed assessment of the proposals.*

*These should not be taken to infer support for the quantum of development proposed.*

### *Main Report*

#### *1 Introduction*

##### *The site*

*1.1 The proposed site is the former Royal High School with its grounds and ancillary buildings, plus a strip of public open space and part of the public walkway on the northern edge of Calton Hill. The site is owned by the City of Edinburgh Council.*

*1.2 The site is located at a prominent, elevated position on the north side of Regent Road on Calton Hill. It is in the New Town Conservation Area, by the edge of the Old Town Conservation Area and within the Edinburgh World Heritage Site.*

*1.3 The primary building is category 'A' listed: designed in 1825 in the Greek revival style by renowned architect Thomas Hamilton. It is composed of a powerful symmetrical grouping of a central Doric temple-style pavilion, flanked by colonnades and subsidiary pavilions on either side. All boundary walls and railings are included within the listing.*

1.4 The site has a number of later-built ancillary buildings. Two of these, the classical gate lodge on the north west side of the site (1885) and classical classroom block at the north east of the site (1894) are also Category A listed. Two other ancillary buildings on the site are unlisted.

1.5 An area of informal landscaping, including small trees and shrubs, is located at the western end of the site next to the entrance to the old school and the walkway to Calton Hill. The public park on Calton Hill, lies to the north of the site, with a small strip being included within the site boundary.

*The setting*

1.6 The site and its surroundings are affected by a number of other designations. Calton Hill is a Site of Special Scientific Interest, is included in the Historic Scotland Inventory of Gardens and Designed Landscapes and has an adopted Calton Hill Conservation Plan.

1.7 The hill contains a nationally important collection of monuments, including the category A listed National Monument, Royal Observatory and Dugald Stewart Monument all in the public park at the top of the hill, and the Category A listed Robert Burns Monument in the Calton Burial Ground. The category A listed townhouses of Royal Terrace are situated immediately to the east of the site and the category A listed, St Andrews House is located to the south east, on the opposite side of Regent Road.

*The proposals*

1.8 The proposals have been revised following a public consultation carried out in February 2015, the ongoing A+DS Design Review process, and ongoing discussions with the Planning authority and key consultees.

1.9 The proposals presented to the Panel were at an early stage in the redesign process. Additional information was provided verbally and via a model of the site during the presentation.

1.10 The proposals are for:

- Change of use, alterations to and restoration of the principal Hamilton building and pavilions;
- Demolition of ancillary buildings including the Category A listed classroom block and gate house;
- New build development in the form of two bedrooms wings, one either side of the Hamilton building;
- Landscaping, parking and public realm works;  
In order to create a "world class hotel of international standing".

1.11 The proposals would repair the exterior of the Hamilton building and pavilions, converting them to provide the circulation space, entrance lobby, dining and lounge spaces for the hotel. Previous proposals to insert new entrance steps at the front of the building and create winter gardens have been removed.

*Proposals to open up the original doorway to the front of the central temple pavilion, and to insert new openings either side, have been retained.*

*1.12 The revised newbuild element of the scheme comprises bedroom wings either side of the Hamilton building, designed in response to the landscape and geology of Calton Hill and Arthur's Seat/Salisbury Crags. The design aspiration, as stated by the architects, is to take forward a landscape-led approach that reflects the strata of the rocks and that 'dissolves the mass' of the newbuild element by creating a more fluid form that is at one with the landscape and is a clear contrast to the classical Greek building.*

*1.13 The proposed wings sit back from the Hamilton building, and step back further with each storey, with green roofs and terraces. The heights are the same as those of the original scheme, with the east block four stories and the west five. Their plans follow the shape of the grounds (the western block broadly triangular and the eastern broadly trapezoid), with broadly curved corners. Materials have not yet been defined, though the architects advise that they are proposed to be dark, such as basalt or bronze, to help the new development appear to sit back into the landscape.*

*1.14 The architects further advise that the intention has been to limit the impact of the proposals on key views, to retain space either side of the Hamilton building, and to prevent the newbuild elements from impacting on the skyline or existing monuments on the hill.*

*1.15 This is the first time that the proposals have been reviewed. No declarations of interest were made by any Panel members in relation to this scheme.*

*1.16 This report should be read in conjunction with the pre meeting papers which provide 3d visualisations, plans and sections. The Panel noted that in order to make informed comments on the proposals, the Calton Hill Conservation Plan should have been made available.*

*1.17 This report is the view of the Panel and is not attributable to any one individual. The report does not prejudice any of the organisations who are represented at the Panel forming a differing view about the proposals at a later stage.  
The Panel's view*

## *2 Setting of the site: relationship to the city and key views*

*2.1 The significance of the building and its landscape setting is so great that any newbuild development on this site must be designed to enhance the existing building and its immediate and wider settings and to stand the test of time.  
Revised design approach*

*2.2 The change in design approach from formal linear wings to one more concerned with integrating the development into the landscape is welcomed.*

*2.3 The design concept of reflecting the strata of the surrounding landscape in the design and form of the wings is welcomed. However, the current detailing of the facades is uniformly horizontal, regular and equally spaced, and consequently does not fully succeed in reflecting the essence of the landscape.*

*This could be addressed through further detailed elevational studies including careful consideration of the detailing of copings, rooflines and other details in the design development stage.*

*2.4 The manner in which the revised approach is presented in images is of concern to the Panel. The images used portrayed the bedroom wings as muted and carefully merged into the background of the hill, suggesting that the buildings could effectively be concealed by the choice of materials. This is not felt to be an accurate representation. Issues specific to the impact of glazing and lighting are dealt with below.*

*Scale of development*

*2.5 The revised massing of the newbuild proposals has been developed to reduce their impact on the Hamilton building from specific viewpoints, and the images presented indicate that the proposals would sit quite well when viewed from these locations. However there are concerns that the large mass of the two new buildings would be highly prominent and dominant when viewed from closer to the development.*

*2.6 Whilst generally welcoming the revised approach, the Panel has significant concerns about the scale of development proposed. This is considered to be overdevelopment for the site, which would be harmful to the nationally important monument of the Royal High School, the Calton Hill assemblage and the city landscape.*

*Massing and key views*

*2.7 The romantic and picturesque views out from the site are also highly important, particularly the view and character of approach of Arthur's Seat and Salisbury Crags when rounding the corner towards the site from Princes Street/Waterloo Place. Any newbuild development should seek to protect and heighten the drama of the juxtaposition of the Hamilton building with the rugged landscape it faces. It is difficult for the panel to conclude whether the proposals achieve this given the level of information presented. Strong concerns were raised that the proposal would damage the existing character.*

*2.8 While it is in the heart of the city centre, Calton Hill's character is a natural landform with some rural elements and the buildings and monuments sit within its dramatic form. This design approach would have been a preferred starting point for any new development: recognising and respecting the rural nature and looking to place any new buildings within the hillscape setting.*

*2.9 There would be value in exploring whether the proposed buildings could be pushed further back into the hill to become part of the landscape rather than separate from it, as a way of reducing their perceived scale and making them more recessive in relation to the Hamilton building.*

*Materials*

*2.10 The selection of materials will be absolutely key to achieving the design aspiration of buildings that blend in to and reflect the character of the landscape and the World Heritage Site.*

*Consideration must be given to how the materials will weather, and how they will look in 10, 50 and 100 years time. It is noted that the presenting team were not able to advise on the proposed materials as they were still considering several options.*

#### *Glazing and lighting*

*2.11 The amount and design of the glazing on the newbuild elements must be very carefully considered. Curved walls and large areas of glazing will create highly reflective surfaces which would make the buildings very prominent in key views across the city to Calton Hill. There is some concern that the presentation images did not present an accurate representation of the visibility of the buildings in this respect. It is recommended that solar path analysis and modelling be carried out to guide the development of window configuration and elevational details, such as reveal depth and pane angles.*

*2.12 Internal and external lighting must also be carefully considered: night time views across the city to the lit monuments are particularly important, and new development should enhance, not harm that or dramatically change the character of the hill particularly when viewed from other hills within the city. There is some concern that the proposals would have a major impact on those views. Detailed modelling should be undertaken to guide the design development and ensure that internal light including from bedroom windows and other hotel lighting would not detract from the existing important views. Architectural, internal and street lighting should be addressed in an integrated manner. The end result should be a gem that contributes positively to its surroundings rather than a floodlight that drowns them out.*

#### *Window treatment*

*2.13 Window detailing will be key to creating depth, movement, shadow, and reflection of light off the buildings, etc in the views across the city to the site.*

### *3 Setting of the site: relationship to Calton Hill, including its landscape, buildings and key monuments*

#### *Design approach*

*3.1 The response to the revised architectural design detailed below does not negate the concerns raised about overdevelopment or suitability of the site.*

*3.2 There is some support for the revised architectural approach compared to the previous proposals. The pulling back of the wings from the Hamilton building, the working with the landscape and concentrating on the setting, and the move away from design and materials that seek to copy the original are all welcomed. This approach begins to reflect the eclectic mix of buildings and monuments on Calton Hill and works much better than the former 'classical' terrace proposals.*

*3.3 One suggestion during the discussion was that the site itself can be analogised with frozen music: the classical form of the Hamilton building has rhythm, proportion and chords laid out clearly and regularly. This merges into the romantic nature of the landscape. The revised landscape-orientated design approach reflects and works well with this context: the proposed new build being analogous to the softer, flowing phrases of the romantic period.*

3.4 *Continuing this analogy, any newbuild development must also have rhythm, chords and pattern that articulate the design and the façade in as clear a pattern as the Hamilton building (which reflects classical music structure of A-B-C-B-A). The currently proposed random 'barcode' facade lacks any readable pattern, and would therefore not be appropriately high quality in this context.*

3.5 *Further consideration needs to be given to the form of the eastern end of the east block, which does not respond to the landscape as successfully as the other elements of the proposals. The landscape behind is sloping down, but this wing pavilion is a hard edged block that jars with the landscape setting.*

*Public access*

3.6 *The proposals to improve and open up the public access road to Calton Hill are strongly welcomed.*

*Wider public realm*

3.7 *The proposals include an aspiration to make significant public realm improvements in terms of road surfaces, street furniture and pedestrian space. It is noted that much of the operational improvements are outside the control of the developer: the Panel strongly recommends that talks are undertaken with the council at an early stage to identify how best these aspirations could be achieved, and to put plans in place to do so.*

3.8 *The design of the landscaping and links between the urban city centre and the public park on Calton Hill will be key in achieving the increased footfall in Regent Road and on Calton Hill, to which the proposals aspire. Hotel use alone won't achieve this, and so the landscaping needs to provide welcoming and legible routes and spaces around and through the site, and up to Calton Hill.*

*Sense of scale*

3.9 *The proposals raise concerns that the scale of development would detract from both the form and scale of Calton Hill itself: the existing buildings and monuments are of grand classical design but generally quite diminutive scale, which leads to the visual illusion that the hill is larger and more dramatic than it actually is. Adding two large buildings on the side of the hill will have a significant impact on the sense of scale of Calton Hill, thereby causing significant harm to its fundamental picturesque character.*

4 *Setting of the site: relationship to the Hamilton building*

*Alterations to the Hamilton Building*

4.1 *The removal of the previous proposal for new steps cutting through the boundary wall is welcomed. In terms of the preservation of the Greek temple character of the listed building there is a preference to see the two new openings in the front elevation removed, though there is an acknowledgement of the commercial appeal of the view across the city that they would create.*

4.2 *Proposed servicing arrangements were supported in terms of traffic movement, however concerns are noted about the associated alterations to the plinth level that would be required.*

*Newbuild wings*

4.3 *The proposed scale and mass of the new build will dramatically change the setting of the A listed Hamilton school building and indeed will become the setting for the Category A listed, highly prominent and highly significant Hamilton building. This will be a dramatic change from the existing setting of the building, and so it is even more important to ensure that the form of any new buildings and the detailing of the façade are of the highest response and quality for this very important site and its building.*

4.4 *Very careful analysis will be required at design development stage to ensure that new buildings do not overshadow the Hamilton building (literally or figuratively). This should include massing, positioning, materials, depth of reveals, and how sunlight bounces off the surface.*

4.5 *Lighting modelling will be absolutely critical to a successful proposal, and therefore planning submissions should include detailed lighting analysis. Designs should ensure the Hamilton building is architecturally lit, and should avoid light pollution onto the Hamilton building from neighbouring hotel rooms.*

5 *Proposed use: suitability for sustainable long term use for Hamilton's High School*  
*Scale of development*

5.1 *It is acknowledged that any proposed use for the site needs to be financially sustainable, and that the principle of bringing the Category A listed building back into a sustainable use is supported. Nonetheless, there are strong concerns that the site cannot accommodate the quantum or quantity of development proposed without harming the character and setting of the building, character of the landscape, and character of the historic environment.*

5.2 *An area of particular concern is the western section of the site, specifically that a building of the scale proposed would result in the appearance of a 'wall' of development from the townhouses to the east of the site to St Andrews House on the west. The concerns raised are not an issue of architectural design, but about the principle of a building of this scale on this part of the site.*

5.3 *Due to their scale and height the proposed newbuild wings do not meet the standard Planning policy and Scottish Historic Environment Policy (SHEP) requirement that any alterations and extensions should not overwhelm the listed building. Ultimately, it may not be possible to achieve the commercial requirements of a hotel of this nature without significantly compromising the character of the listed building and its setting. Compromising the character of the listed building and its setting would not be acceptable and could set a precedent for other important historic sites. The Panel notes that this is not an enabling development proposal.*  
*Hotel use*

5.4 *In addition to the concerns raised about the quantum of development required by the proposed hotel use, not all members of the Panel are convinced that hotel use is the best approach for this most sensitive of sites.*

5.5 *The Panel notes that the city has not as far as is known looked at proposals to reuse the buildings as a city school.*

## *Future proofing/sustainability*

5.6 *It will be important to ensure that any new build development on the site is flexible in its use, and could lend itself easily to conversion to alternative uses in the future. There is some question as to the flexibility of the proposed wings given their depth of plan.*

## 6 *Recommendations*

6.1 *There are significant concerns that the quantum of development proposed in order to achieve a "world class" hotel on the site cannot be delivered without exceptional and significant harm to the character and setting of this unique and nationally important historic building and landscape setting. The recommendations below should be read in this context.*

6.2 *In developing the design, the Panel supports the following aspects and therefore advocates that these should remain in the proposals:*

- *The repair and reuse of the Hamilton building, and the removal from the proposals for the interventions to the front elevation;*
- *The intention to open up and improve the public route to Calton Hill and the proposed treatment of the public realm;*
- *The revised landscape-based design approach to newbuild development on the site, in particular the softer form and pulling back of the wings from the Hamilton building. Efforts to develop a more sensitive response to the building form and public realm at the western entrance to the site are also noted. This approach is commended, compared to the previous proposals, and is a generally positive response to the concerns raised at consultation.*

6.3 *In developing the proposals the Panel suggests the following matters should be addressed:*

- *The Panel remains concerned that the scale of development proposed to facilitate a "world class" hotel is overdevelopment of the site that would cause significant harm to this nationally-important monument and landscape, and erode the careful composition of Calton Hill. Particular concern is raised about the suitability of newbuild development at the west side of the building, and about the scale of the proposed wings in relationship to the Hamilton building, particularly at the western end. It should be noted that this is not an issue of design, but of quantum of development. The Panel's recommendations on design considerations and development should be taken in this context.*
- *The further evolution of design should seek to address the concerns about the impact of the development on the perceived scale of Calton Hill itself: it will be important to ensure that any development does not dominate its surroundings and harm the current relationship between the monuments and landscape.*

- *More work is required to develop appropriate building form at the east side of the scheme, which in its current form distracts from the landscape idea of sloping down from west to east.*
- *Due to the relatively early stage of the design proposals there is clearly further work required to develop the façades so that they are not merely flat surfaces. This will impact experience of the site at all scales from city wide distant views to the direct setting of the Hamilton building, and so getting this right will be hugely important to the success of any newbuild element. This should include:*
  - *Consideration of the rhythm, detailing and depth of the façade and windows, to echo the Hamilton building and develop the 'music' on the facade;*
  - *Careful detailing of the 'strata' to avoid equal horizontal layers;*
  - *Careful selection of materials, based both on current appearance and how they will wear and weather over a long period of time;*
  - *Careful detailing of any green roofs and terraces;*
  - *Careful consideration of the internal and external lighting (note that coloured lighting is strongly discouraged) to ensure that the development does not drown out the landscape and monuments around it;*
  - *Sunlight and lighting modelling;*
- *Other key design considerations that should be informing the development of the proposals are:*
  - *Detailed assessment of the Conservation Plan and understanding of the identity and character of the site underpinning all design decisions;*
  - *Understanding of the newbuild elements as a new setting for the immensely valuable listed building underpinning all design decisions;*
  - *The corner treatment at the entrance to the site, which is also the entrance to the Calton Hill access road and the point at which views out from Regent Road to Arthur's Seat become visible: getting this right could revolutionise the area and attract much greater footfall;*
  - *Exploring the potential to step the newbuild wings down at the rear;*
  - *Consideration of using any high level accommodation for public use such as a restaurant to open up the panoramic views across the city to a wider user group.*
  - *Developing the landscaping to ensure that the route to Calton Hill feels public, welcoming, visible, accessible and of appropriate character.*
  - *Ensuring that the newbuild development could be flexibly used in the future.*

- *In order to enable a full assessment of the proposals, the Planning submission should include:*
  - *The Conservation Plan for the site and conservation statement setting out how the proposals achieve the aspirations of the Conservation Plan.*
  - *Comprehensive façade and window detailing;*
  - *A detailed lighting strategy;*
  - *Information on materials selection and long term appearance;*
  - *Updated visualisations showing a broad range of day and night time views at a range of scales and which pay particular attention to the appearance of the materials and façade, including reflections from curved glazing and impact of night time lighting to assess the development's environmental impact;*
- *Reoccupation of the building and reanimation of the road to Calton Hill would make a positive difference to the existing anti social behaviour on Calton Hill. It is advised that Secured by Design accreditation should be sought. Given the importance of the location and for security of hotel guests national security issues should also be considered, and it is advised that Counter Terrorism advice is sought from the Police: incorporating security details into the proposals at an early stage will allow them to be integrated and inconspicuous.*
- *Consideration should be given to removing the new openings in the front elevation of the Hamilton building from the scheme, also to exploring alternative methods for servicing the hotel without creating an opening through the plinth.*
- *Work should also begin to develop a plan for the public realm and landscaping elements of the scheme that are outside developer control. Details of this plan should be included in the submission.*

