

# Development Management Sub Committee

Wednesday 24 April 2019

**Application for Listed Building Consent 18/07127/LBC  
At 35 St Andrew Square, Edinburgh, EH2 2AD  
Demolition of boundary wall, modern basement kitchen,  
rear extension, and outbuilding within existing rear garden;  
regrading of land, erection of new boundary features and  
public realm.**

<b>Item number</b>	6.1(d)
<b>Report number</b>	
<b>Wards</b>	B11 - City Centre

## Summary

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The development is considered to have an adverse impact on the special interest and setting of 35 St Andrew Square as the layout of the building's historic feu and the design of its curtilage wall to the rear will be lost. The loss would, therefore, dilute the sense of place and historical understanding of the listed building undermining an important element of its special architectural character and historic interest.

The removal of the wall is required to facilitate adequate suitable access to the new concert hall to the rear of 36 St Andrew Square and there are beneficial effects of the public realm proposals that subtly delineate and define the rear curtilage of the historic feu with 'picked' finish to the Yorkstone paving used within the wider scheme for the concert hall. However, on balance, the scale of this impact on the listed building is judged to adversely but not, significantly adversely affect its special interest including its setting.

Furthermore, the cultural and wider community benefits brought about as a result of the proposed concert hall would make an exceptionally positive contribution towards the city's cultural, social and educational provision. It is therefore judged that these exceptional benefits would justify a departure from the presumption set out in paragraph 3.38 of the Historic Environment Scotland Policy Statement. The demolition of the wall is only acceptable in parallel with the delivery of the concert hall and therefore a suitable condition to ensure this is attached.

## Links

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<a href="#"><u>Policies and guidance for this application</u></a>	LPC, CRPNEW, LEN03, LEN04, NSG, NSGD02, NSLBCA,
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# Report

## **Application for Listed Building Consent 18/07127/LBC At 35 St Andrew Square, Edinburgh, EH2 2AD Demolition of boundary wall, modern basement kitchen, rear extension, and outbuilding within existing rear garden; regrading of land, erection of new boundary features and public realm.**

### **Recommendations**

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1.1 It is recommended that this application be Granted subject to the details below.

### **Background**

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#### **2.1 Site description**

The application site lies within Edinburgh city centre, to the east of St Andrew Square and incorporates the Category 'A' listed building at 35 St Andrew Square including its curtilage. Harvey Nichols department store and Multrees Walk are located to the north. The forecourt of Dundas House at 36 St Andrew Square is located directly to the south.

The site is located in the New Town Conservation Area and the Old and New Towns of Edinburgh World Heritage Site. 35 St Andrew Square is a nationally important category 'A' listed building (LB Ref: 29704, listed on 13 April 1965) and acknowledged in the World Heritage Nomination document. It is thought to have been built by James Craig to a design by Robert Adam and sits on one of the key plots and locations within James Craig's First New Town.

There are several other listed buildings and monuments in proximity to the site. These include the category 'A' listed Dundas House, along with the Category 'A' listed Monument to John, 4th Earl of Hopetoun, erected in the forecourt of Dundas House and its twinned flanking townhouse at 37 St Andrew Square that together frame Dundas House and its forecourt.

35 St Andrew Square is highly significant as one of the first and grandest townhouses in the First New Town. It was the first of the two twinned pavilion townhouses that flank Dundas House to be built with its construction predating Dundas House by two years. The building comprises a symmetrical 3-storey and basement classical former townhouse with two highly decorated principal facades to both St Andrew Square and the forecourt to Dundas House. 35 St Andrew Square is established as an outstanding neo-classical building, which together with its symmetrical framing pavilion at No. 37 and Dundas House as its centrepiece, remains one of the few surviving original architectural compositions on the square.

Originally built as a residence in 1769 for Andrew Crosbie of Holm, advocate and partner in the Douglas and Heron Bank of Ayr, the building was used as a hotel in 1806 before it was purchased by the Royal Bank of Scotland for their head office in 1819 when it was remodelled and extended on a number of occasions including the reproduction of three east elevation bays and the lowering of its ground floor to create its banking hall. When RBS moved next door into Dundas House, the property reverted back into hotel use where it was further enlarged.

More contemporary works to the property included the redevelopment of the rear garden area to form a raised garden terrace to accommodate a catering kitchen within the basement. A cast iron spiral staircase for fire escape and a traditionally finished single storey outhouse to house a goods lift and refuse bins were also erected within the rear garden.

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

## **2.2 Site History**

There is significant history relating to 35 St Andrew Square, for minor works that included; satellite dishes; lighting and minor internal works. The applications below are for more substantive works:

October 2005 - Listed building consent granted for works including construction of covered link building within the existing external basement area, erection of a traditionally finished outbuilding to house goods lift and refuse bins, reinstatement of original astragal configuration to window openings to south elevation, erection of external escape stairs to rear, and landscaping of existing car park area on bunker roof (all as amended) (application reference numbers: 05/02086/FUL and 05/02086/LBC).

There is a detailed application for planning permission and a parallel application for listed building consent for the adjoining site at 35 - 36 St Andrew Square:

September 2018 - Erection of music and performing arts venue with licensed café/restaurant and bar facilities, and related arrangements for infrastructure, demolitions, and other works (amended) (application reference number: 18/04657/FUL).

September 2018 - Proposed demolitions, alterations, remodelling and erection of extension to the listed building (amended) (application reference number: 18/07730/LBC).

## **Main report**

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### **3.1 Description Of The Proposal**

The application proposes the alteration of the garden boundary wall to the rear of 35 St Andrew Square; removal of modern garden structures including the demolition of the contemporary single storey outbuilding; and the lowering of the modern raised garden terrace and kitchen below.

It is proposed to remove the entirety of the sandstone ashlar boundary wall to the side (south) and also, the remaining rear (east) boundary wall and gate to where it abuts the contemporary, albeit traditionally finished, outhouse located within the north east corner of the rear garden.

The boundary walls delineate the original rear curtilage of the historic feu and are of a traditional construction and finish to the townhouse. However, they are contemporary additions, having thought to have been erected in the 1960s. The walls are constructed in ashlar sandstone and reach a modest height in comparison to the boundary wall delineating the former rear garden area of the flanking pavilion townhouse at 37 St Andrew Square.

The proposals involve the removal of the basement kitchen; upper garden terrace; and the demolition of the outbuilding enabling the garden to revert back to its original level - in line with the level of the forecourt to Dundas House. This will allow for the incorporation of this section of the rear garden into the public realm and landscaping proposals associated with the wider redevelopment scheme. Within the new section of public realm, a change in material finish to the Yorkstone paving proposed within the wider scheme is proposed. A picked finish (rougher textured appearance) helps to subtly delineate the historic feu of 35 St Andrew Square whilst also enabling a seamless surface for drainage, vehicle overrun and pedestrian movement. Two new sections of walling with iron railings are to be erected to delineate the existing raised cast iron grille covered lightwell. The new walls will incorporate two to three polished ashlar sandstone courses with coping stones and railings.

### Scheme one

An amendment to the demarcation of the curtilage of 35 St Andrew Square by a change in texture on the surface of the Yorkstone was brought forward during the assessment of the proposals.

### Supporting information

The following documents were submitted in support of the applications for planning permission and listed building consent:

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

These documents can all be viewed on the Planning and Building Standards Online Service.

### 3.2 Determining Issues

Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states - In considering whether to grant consent, special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. For the purposes of this issue, preserve, in relation to the building, means preserve it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character.

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states - special attention shall be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

In determining applications for listed building consent, the Development Plan is not a statutory test. However the policies of the Local Development Plan (LDP) inform the assessment of the proposals and are a material consideration.

### 3.3 Assessment

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

- a) The impact on the special architectural or historic interest of the listed building including its setting is acceptable;
- b) The proposals will preserve the character and appearance of the New Town Conservation Area;
- c) Impacts on equalities and rights are acceptable; and
- d) Public comments have been addressed.

Section 14(2) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states:

*'In considering whether to grant listed building consent for any works, the 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.'*

Paragraph 4 of HESPS identifies:

*'The documents that should be referenced for the management of the historic environment are Scottish Planning Policy, Our Place in Time: The Historic Environment Strategy for Scotland, Historic Environment Circular 1, the associated primary and secondary legislation and Historic Environment Scotland's Managing Change series of guidance notes.'*

The assessment on character and setting of the listed building and character and appearance of the conservation area have been informed by the Built and Cultural Heritage Statement submitted in support of the listed building consent application, and also other supporting information, including the EIA Report, submitted as part of the associated detailed application for planning permission for the adjoining site at 36 St Andrew Square.

a) Impact on the special architectural and historic interest of the listed building including its setting

### **Method of assessment**

For the purposes of assessing the impact of the proposals on the special interest and setting of the listed building, a two stage approach is required:

#### Stage 1:

Consideration should firstly be given to the relevant HES Managing Change Guidance to enable the identification of the impact on the listed buildings special architectural character and historic interest of the listed building including its setting.

The relevant HES Managing Change Guidance applicable to this assessment is:

1. Boundaries
2. Setting

#### Stage 2:

Should the impact on the building's special interest, including its setting, be considered as adverse or significantly adverse, careful consideration must then be given to paragraph 3.47 of the HESPS to assess the relative importance of the listed building; the scale of the impact on that special interest; other options which would ensure a continuing beneficial use for the listed building with less of an impact on its special interest; and whether there are significant benefits for economic growth or wider community which justify a departure from the presumption set out in paragraph 3.38 of the HESPS.

### **HES Managing Change in the Historic Environment: Boundaries -guidance**

HES Managing Change in the Historic Environment: Boundaries guidance (Oct 2010) notes that:

*'The layout and design of a boundary, its materials and method of construction, and the way in which it relates to other structures can be important elements of the character of a building or street, or contribute substantially to the sense of place and historical understanding of an urban landscape.'*

The document notes that *'boundaries and their associated structures and fixtures often have formal design relationships with a building or garden / landscape'* and that *'the continuity or uniformity of a boundary can characterise a whole street or area of the same period, style, historical development or original ownership.'* As such the guidance refers to the design of boundaries to the rear that tend *'to be of high rubble walls with 'slaister' (widely spread) motoring and stone copes'*.

The proposed demolition works involve the removal of the ashlar sandstone walls across the side (south) and rear (east) boundaries and the complete demolition of the single storey outbuilding. Whilst traditional in design and appearance, with stone walls and simple pitched roof in slate, the outbuilding was recently erected and does not contribute to the special interest and character of listed building. Its removal would therefore, not affect the special architectural or historic interest of the listed building.

Although it is acknowledged that the stone boundary walls are not original having thought to have been constructed in the 1960s, they demarcate the original curtilage of the historic feu and therefore comprise an important element of the special architectural character and historic interest attributed to the listed building. As no replacement boundary structure is proposed along these boundaries, the layout of the buildings historic feu and the design of its curtilage wall to the rear will be lost. The loss would therefore dilute the sense of place and historical understanding of the listed building undermining an important element of its special architectural character and historic interest.

The removal of the raised garden terrace reverts the rear curtilage back to its original level to match the forecourt of Dundas House and proposes a change in material finish to the Yorkstone paving used within the wider scheme. A picked finish helps to subtly delineate and define the historic feu of 35 St Andrew Square whilst also enabling a seamless surface for drainage, vehicle overrun and pedestrian movement. The proposed addition of the dwarf walls and railings surrounding the existing lightwell allows light to reach the lower level of number 35 and retains a sense of the curtilage whilst also enabling visual continuity of the space between the existing buildings. The attachment of a planning condition is considered appropriate to ensure that its design and the materials it utilises are suitably reflective of its historic context.

#### *Conclusion - HES Managing Change guidance on 'Boundaries'*

Whilst the removal of the outbuilding and garden roof terrace, including the levelling and treatment of the new surfaces, are laudable, the loss of the traditionally finished stone boundary walls and the significant adverse impact on the special architectural character and historic interest of the category 'A' listed building this would cause cannot be disputed.

#### *Historic Environment Scotland consultation response*

Historic Environment Scotland (HES) do not object to the proposals. HES are content that the proposals would not have a significant adverse impact on the special architectural and historic interest of the building.

## **HES Managing Change in the Historic Environment - 'Setting' guidance'**

Historic Environment Scotland's document 'Managing change in the Historic Environment - Setting' states;

'*Setting*' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced.

The document states that where development is proposed it is important to:

- *Identify the historic assets that might be affected;*
- *Define the setting of each historic asset; and*
- *Assess the impact of any new development on this.*

Para 3.51 of HESPS notes that '*when considering a developer's proposals to integrate listed buildings into an overall development, Historic Environment Scotland expect planning authorities to take into account not only the desirability of preserving the building's historic fabric but the need to maintain it in an appropriate setting*'.

The setting of a historic asset comprises our present understanding and appreciation of its current surroundings, and what (if anything) survives of its historic surroundings combined with subsequent historic changes.

### **HES Managing Change 'Setting' guidance Key Issue 1- 'Identify the historic assets that might be affected'**

For the purposes of this listed building assessment, 35 St Andrew Square is the historic asset most directly affected. However, consideration is given to how the combination of 35, 36 and 37 St Andrew Square as a composition would be affected by the proposals.

### **HES Managing Change 'Setting' guidance Key Issue 2- 'Define the setting'**

#### *Wider setting*

The existing setting of 35 St Andrew Square has changed from when it was originally constructed. As one of the first buildings in the First New Town it predates Dundas House (1771) and its twinned flanking townhouse at 37 St Andrew Square (1781). The combination of these three buildings create a set piece that, along with the forecourt of Dundas House, clearly defines their relationship to St Andrew Square on the principal George Street axis. The buildings now form part of a dense urban context as the square and surrounding built environment have been developed through time.

35 St Andrew Square is of primary significance in the composition of the site. Paired with its symmetrical pavilion building at 37 St Andrew Square, they flank Dundas House as the centrepiece. All three buildings help to provide a unified and distinct architectural composition that is clearly legible on both site and plan.

### *Immediate setting*

Both 35 and 37 St Andrew Square retain the original curtilage of their historic feus. Their rear curtilages are easily appreciated from public views owing to the set-back of Dundas House and presence of its open forecourt. However, the depth and height of their rear curtilages and subsequent boundary treatments varies, with No. 37 extending to far greater depth and height. The extent and character of their rear garden plots also exhibit stark differences with the addition of three further bays to reduce the depth of the garden at No. 35 and the addition of a flat roofed single storey rear extension at No. 37.

Notwithstanding this, the rear curtilage of their historic feus are retained and easily observable. The way in which their rear curtilages relate to each other and the forecourt of Dundas House as an unified and distinct architectural composition comprise important elements of the character of the listed buildings, street and contribute substantially to the sense of place and our understanding of this historic urban landscape.

### **HES Managing Change 'Setting' guidance Key Issue 3 -'Evaluate the potential impact of the proposed changes'**

Of great importance to the setting of the 35 St Andrew Square is its relationship with its twinned pavilion townhouse and their compositional contribution in framing Dundas House including its forecourt. In certain views an element of the relationship between these buildings will be affected in an adverse manner by the removal of the boundary wall.

The most significant impact would be on some of the close views from within forecourt of Dundas House and on the east side of St Andrew Square, from the public footway, where the boundary wall of 35 St Andrew Square can be clearly seen to demarcate the historic feu of the listed building. This helps created a strong relationship between the three buildings and affords 35 St Andrew Square a degree of prominence. As this relationship is eroded, so too is an element of what affords 35 St Andrew Square its prominence. However, when viewed from a greater distance away, the visibility of boundary wall is reduced given its level and position within the site. The presence of heavily detailed cast iron railings and gates fronting the forecourt to Dundas House and is considered negligible.

### *Conclusion*

The effect of the proposed removal of the boundary wall on the setting of 35 St Andrew Square; its relationship with its twinned pavilion townhouse; and their compositional contribution in framing Dundas House including its forecourt, is assessed as an adverse level of impact.

### *Historic Environment Scotland consultation response*

Historic Environment Scotland (HES) do not object to the proposals. HES is content that the proposals would not have a significant adverse impact on the special architectural and historic interest of the building.

## **Overall Stage 1 Assessment - HES Managing Change Guidance on 'Boundaries' and 'Setting'**

Whilst the removal of the outbuilding and garden roof terrace including the levelling and treatment of the new surfaces are laudable, the loss of the traditionally finished stone boundary wall and the significant adverse impact on the special architectural character and historic interest of the category 'A' listed building this would cause cannot be disputed. The effect of the proposed removal of the boundary wall on the setting of 35 St Andrew Square; its relationship with its twinned pavilion townhouse; and their compositional contribution in framing Dundas House, including its forecourt, is assessed as an adverse level of impact.

### **Stage 2 Assessment**

Having addressed the points in the Managing Change Guidance the proposals have an adverse impact on the listed building and, as such, consideration must be given to paragraph 3.47 of the Historic Environment Scotland Policy Statement 2016 (HESPS) that states planning authorities, in reaching a decision should carefully consider:

- 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 3.38.*

### **HESPS Point a - 'Special interest'**

35 St Andrew Square is a nationally important building. It is one of the finest Georgian houses, built by James Craig to a design by Robert Adam, and one of the earliest buildings in the New Town. Built in accordance James Craig's New Town plan, it sits slightly off-centre with the axis of George Street in a significant location within the New Town and World Heritage Site. It is a symmetrically designed classical Georgian townhouse that, despite continuous changes to the surrounding built environment, retains a significant presence on St Andrew Square by virtue of its design. Together with its twinned pavilion townhouse at 37 St Andrew Square, they flank Dundas House and forecourt which, as a composition, create an important set piece and comprises a very significant surviving part of the original fabric of Edinburgh's New Town. 35 St Andrew Square contributes considerably to the townscape of the New Town Conservation Area and World Heritage Site.

There can be no disputing the special interest of the listed building and composition of 35 - 37 St Andrew Square.

### **HESPS Point b - 'Scale of impact'**

The loss of its physical boundary results in a significant intervention to an extremely important category 'A' listed building. As the layout of the buildings historic feu and the design of its curtilage wall to the rear will be lost. The loss would therefore, dilute the sense of place and historical understanding of the listed building. The loss of the boundary wall would undermine an important element of the listed buildings special architectural character and historic interest. The proposed removal of the boundary wall will also have an adverse impact on the setting of 35 St Andrew Square is its relationship with its twinned pavilion townhouse and their compositional contribution in framing Dundas House including its forecourt.

The removal of the wall is required to facilitate adequate suitable access to the new concert hall to the rear of 36 St Andrew Square and there are beneficial effects of the public realm proposals that subtly delineate and define the rear curtilage of the historic feu with 'picked' finish to the Yorkstone paving used within the wider scheme for the concert hall. Overall and on balance, the scale of this impact on the listed building is judged to adversely but not, significantly adversely affect the special interest, including its setting and the compositional setting, of 35 - 37 St Andrew Square.

### **HESPS Point c - 'Other options for Use of the Building'**

The site is currently used as offices by IMPACT Scotland and will also be used by the Scottish Chamber Orchestra as their Headquarters. Whilst the retention of the boundary walls would not prohibit their use of the building for offices, the proposals must be considered within the context of the wider scheme for the concert hall and its associated public realm improvements as discussed in point d below.

### **HESPS Point d - 'Significant Benefits'**

Paragraph 3.38 of HESPS states that there is a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting.

The applicant has submitted a Socio-Economic and Cultural Impact Assessment to support the corresponding application for planning permission for 35-36 Dundas House, a topic which was also scoped into the EIA Report and fully assessed within the report of handling associated with the application for planning permission.

The proposed development is fully endorsed by the Council's Culture Service. It also forms an important cultural strand within the City Deal, unlocking £25million of strategic match funding from all levels of government and has significant financial backing and under-pinning from a private philanthropic donor. As the first new performance venue to be built in Edinburgh in a century, this new development will represent a significant addition to the city's cultural infrastructure, and will signal Edinburgh's success as a Festival City and its ambitions in the creative and cultural industries.

The cultural and wider community benefits to the city, region and nation, brought about as a result of the proposed development and the opportunities for advancement it provides, are acknowledged and supported in the EIA Report.

The report of handling for the detailed application for full planning permission for 36 St Andrew Square sets out the benefits the proposal brings to the City and contends that the use would make an exceptionally positive contribution towards the City's cultural, social and educational provision/ This exceptional level of benefit helps set out a compelling case for justifying a departure from the presumption set out in paragraph 3.38 of HESPS.

Notwithstanding these significant cultural and community benefits, a crucial element of the wider proposals include a comprehensive public realm and landscaping strategy that should be considered in relation to these proposals.

### **Stage two assessment conclusion**

In light of the policy considerations detailed within paragraph 3.47 (points a - d) of HESPS, which concerns the assessment of the scale of adverse impacts on the special interest of a listed building including its setting, it is found that consideration of the points b) and d) of this policy are of specific relevance to the assessment of the proposals. Overall and on balance, the scale of the impact (point b) on the listed building is judged to adversely but, not significantly adversely affect its special interest including its setting. The cultural and wider community benefits brought about as a result of the wider proposals would make an exceptionally positive contribution towards city's cultural, social and educational provision and present an influential consideration that cannot be overlooked. It is therefore judged that these exceptional benefits would justify a departure from the presumption set out in paragraph 3.38 of the HESPs in accordance with point d) of the HESPS.

#### **b) Impact on the special character and appearance of the New Town Conservation Area**

Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 which states:

*In 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.*

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

- the formal plan layouts, spacious stone built terraces, broad streets and an overall classical elegance;
- views and vistas, including axial views along George Street;
- terminated vistas have been planned within the grid layouts, using churches, monuments, buildings and civic statutory, resulting in an abundance of landmark buildings. These terminated vistas and the long distance views across and out of the Conservation Area are important features;
- grand formal streets lined by fine terraced building expressing neo-classical order, regularity, symmetry, rigid geometry, and a hierarchical arrangement of buildings and spaces;
- within the grid layouts, there are individual set pieces and important buildings that do not disturb the skyline;

- the setting and edges of the New Town and Old Town;
- the extensive collection of statues, monuments, historic graveyards and national memorials in the Conservation Area make a significant contribution to the historic and architectural character of the area. They also provide a focus and punctuation points for many views;
- boundaries are important in maintaining the character and quality of the spaces in the New Town. They provide enclosure, define many pedestrian links and restrict views out of the spaces. Stone is the predominant material; and
- new development should be of good contemporary design that is sympathetic to the spatial pattern, scale and massing, proportions, building line and design of traditional buildings in the area.

### *Wider views*

The established spatial hierarchy of the First New Town plan is a key characteristic of the conservation area. The historic plan forms, allied to the dramatic topography, results in important, terminated and long vistas with landmark features. It is the views along George Street towards St Andrew Square that contribute to the clarity of the urban structure of the planned First New Town and alignment of key buildings and spaces. Whilst the rear curtilage wall lies adjacent to this centrally aligned axis, to the north of Dundas House's forecourt, it is not possible to view or interpret the rear curtilage from wider views from St Andrew Square Gardens or along George street owing to its set-back position within the site and the solidity of the highly detailed cast iron railings and gates to the St Andrew Square frontage of Dundas House.

### *Localised Views*

Within the forecourt of Dundas House, the delineation of the rear curtilage by the stone wall is clearly visible and easily interpreted as the historic feu of 35 St Andrew Square. The impact from this location on the special character and appearance of the conservation area is more significant as the demolition of the boundary wall will remove strong physical evidence of the rear curtilage of the historic feu arrangement. The proposals would therefore significantly disrupt the continuity and uniformity that characterise original ownership and the ridged and ordered urban structure that contribute to the special character and appearance of the New Town Conservation Area.

### *Impact on group composition - 35 - 37 St Andrew Square*

The stone wall delineates the forecourt and front curtilage of Dundas House together with the rear curtilage of 35 St Andrew Square and therefore contributes to the special compositional character of 35 St Andrew Square, its twinned flanking pavilion townhouse and Dundas House with its forecourt as its centrepiece. As this arrangement is one of the few surviving original architectural compositions on the square, the proposals will undoubtedly dilute the strong arrangement of spaces around these buildings and disrupt the symmetrical urban composition that characterises original ownership and this unique part of the First New Town. However, this is mitigated by the solidity of the tall cast iron railings and gates along the St Andrew Square frontage of Dundas House to obscure clear views of the rear curtilage from public footway along the east side of St Andrew Square.

Overall, and on balance, taking the wider proposals for the concert hall into consideration, it is considered that the proposed development does not remove or detract from key characteristic components of the conservation area that gives the area its special interest.

The proposals preserve the special character and appearance of the conservation area.

c) Impacts on equalities and rights are acceptable

An Integrated Impact Assessment has been carried out for the parallel application for planning permission for and raises no overriding concerns. This is viewable on the Planning and Building Standards Online Services.

d) Public representations have been addressed

**Material comments (support)**

- Positively contribute to the cultural offer of not just Edinburgh, but of Scotland helping to attract visitors which will benefit the wider economy. Addressed in 3.3a).
- Public benefits of the proposals outside of performance time given the provision of function spaces, café, foyer and crown walkway as publically accessible spaces within the scheme. Addressed in 3.3a).

**Non Material comments (objections)**

- Comments related to the applications for planning permission and listed building consent associated with 35-36 St Andrew Square (Dundas House) and not to the proposals detailed in this application.

*Conclusion*

Overall and on balance, the scale of the impact on the listed building is judged to adversely but, not significantly adversely affect the special interest of the listed building including its setting. It is considered that the proposed development does not remove or detract from key characteristic components of the conservation area that gives the area its special interest.

The cultural and wider community benefits brought about as a result of the wider proposals would make an exceptionally positive contribution towards city's cultural, social and educational provision present an influential consideration that cannot be overlooked. It is therefore judged that these exceptional benefits would justify a departure from the presumption set out in paragraph 3.38 of the HESPS.

It is recommended that this application be Granted subject to the details below.

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

#### **Conditions:-**

1. Comprehensive details of the design and materials specifications of the new boundary wall and railings shall be submitted to and approved by the Planning Authority prior to commencement of over-ground works on site.

Note: The boundary wall shall be constructed from ashlar sandstone with rounded copes and appropriately 'Georgian' detailed cast iron railings, painted black and slotted individually into the stone wall.

2. Where the concert hall, as consented under parallel planning application reference 18/04657/FUL is not occupied within 3 years of the commencement of development of the concert hall (including demolitions), or an alternative timescale agreed in writing by the Planning Authority, the boundary wall shall be reinstated in stone to the satisfaction of the Planning Authority.

#### **Reasons:-**

1. In order to safeguard the character of the statutorily listed building.
2. To ensure that the wider benefits, which justify the demolition of the boundary wall, are delivered

#### **Informatives**

It should be noted that:

1. The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
2. This consent is for listed building consent only. Work must not begin until other necessary consents, eg planning permission, have been obtained.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. Any proposed signage requires advertisement consent and depending on the location, may require Listed Building Consent.

## **Financial impact**

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

There are no financial implications to the Council.

## **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:**

The parallel detailed application for full planning permission (ref: 18/04657/FUL) was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the report of handling for the planning application.

## **Sustainability impact**

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

The parallel detailed application for planning permission (ref: 1804657/FUL) meets the sustainability requirements of the Edinburgh Design Guidance.

## **Consultation and engagement**

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

The proposal was presented to the Edinburgh Urban Design Panel at pre-application stage on 27 September 2017. The comments have been considered in the assessment of this application.

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

The application was advertised on 14 September 2018, with 21 days allowed for comments. The application also appeared in the Weekly List on 11 September 2018.

The proposals that formed scheme one received 2 letters of objection, and one letter of support.

All the interested parties who previously commented on scheme one were re-notified on 27 February 2019, with 14 days allowed for comments. No representations were received for scheme two.

All of the comments received have been considered in the assessment of the application. An assessment of these representations can be found in the main report in section 3.3 d).

## Background reading/external references

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

## **Statutory Development**

### **Plan Provision**

The application site is shown to be within the City Centre as defined in the Edinburgh Local Development Plan (LDP).

### **Date registered**

10 September 2018

### **Drawing numbers/Scheme**

01 - 10, 12 - 23,

Scheme 2

## **David R. Leslie**

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Daniel Lodge, Planning Officer

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## **Links - Policies**

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### **Relevant Policies:**

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

**The New Town Conservation Area Character Appraisal** states that the area is typified by the formal plan layout, spacious stone built terraces, broad streets and an overall classical elegance. The buildings are of a generally consistent three storey and basement scale, with some four storey corner and central pavilions.

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.

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

## **Relevant Non-Statutory Guidelines**

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

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

# Appendix 1

## **Application for Listed Building Consent 18/07127/LBC At 35 St Andrew Square, Edinburgh, EH2 2AD Demolition of boundary wall, modern basement kitchen, rear extension, and outbuilding within existing rear garden; regrading of land, erection of new boundary features and public realm.**

### **Consultations**

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#### **Edinburgh Urban Design Panel - 27/09/2017**

##### *1 Recommendations*

*1.1 The Panel was supportive of the principle of a music venue in this location and acknowledged that it represented an exciting opportunity to enhance activity and permeability in the surrounding public realm.*

*1.2 The Panel advised that the proposal's relationship to its special historic setting and its impact on important axial and oblique views, particularly the view of Dundas House from George Street, is critical and requires to be carefully considered. The Panel also agreed that a coherent, well designed and high quality public realm would be essential to the success of this development and its integration with the surrounding area.*

*1.3 In developing the proposals, the Panel suggests the following matters should be addressed:*

- o Ensure that the development relates appropriately in position, scale, massing and design to the site's special historic character and key views;*
- o Develop a coherent, high quality public realm which enhances legibility through the site;*
- o Maximise barrier-free pedestrian permeability into and through the site and minimise conflict with service vehicles;*
- o Develop an architectural response which feels part of Edinburgh and can stand the test of time; and*
- o Incorporate security measures through early engagement with security advisors.*

##### *2 Introduction*

2.1 The site is located to the east of St Andrew Square, south of Multrees Walk and west of St James Centre. The site comprises of the A Listed Dundas House (36 St Andrew Square), its rear extension (circa 1960s) and car park. Dundas House is a three storey building of relatively modest scale and it contributes to the very high quality historic townscape of Edinburgh's New Town. It is positioned on axis with George Street where axial views are critical to its setting.

2.2 The site is located in the City Centre Retail Core and City Centre, as defined in the Edinburgh Local Development Plan (LDP). It also sits within the New Town Conservation Area and Edinburgh World Heritage Site. The site is located close to several listed buildings and structures. The site also sits in a number of key views as set out in the Edinburgh Design Guidance.

2.3 The site is also located within the St James Quarter Development Brief, where it identifies new opportunities for pedestrian permeability through the site.

2.4 One declaration of interest was made by Adam Wilkinson from Edinburgh World Heritage Trust (EWHT), who confirmed that he had met previously with the agents/developers regarding this proposal. This was not considered to be conflicted interest.

2.5 This report should be read in conjunction with the pre-meeting papers.

2.6 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.

### 3 Position, Scale, Massing and Design

3.1 The Panel welcomed the use of the model to demonstrate the proposal's potential scale and massing and agreed that its impact upon the site's special historic setting and key views, particularly the long view from George Street, was a critical consideration.

3.2 The Panel was concerned about the proposal's scale and massing particularly given the limited size of the site. The Panel recognised that the design concept is still at an early stage and may have an adverse impact on the character of the area and the amenity of adjacent buildings. The Panel agreed that further work is needed to ensure the proposal sits comfortably on the site.

3.3 The Panel discussed whether the proposal should be viewed as currently proposed in an asymmetric form from behind Dundas House, or whether the proposal should be visible at all above Dundas House when viewed from George Street. Dundas House is part of the 'set piece' of buildings along George Street and the proposal should not detract from this. The Panel suggested that one option could be that the proposal may be sunk down to minimise its visual impact. The Panel concluded that further assessment work was needed to explore how the development will impact on key views, particularly eye level views, and the setting of listed buildings, particularly Dundas House.

3.4 The Panel suggested that distant and unexpected views of the proposal should be explored including those from oblique angles.

3.5 The Panel was concerned that the positioning of the concert hall, studio and public foyer in separate blocks (albeit connected by access links), could result the site appearing fragmented. There is precedent for this in the character of the immediate area but the coherence of the buildings, public realm and links in-between will be critical. Further work is needed to ensure this is delivered. The Panel was also keen to see the site linking logically into adjacent sites.

3.6 The Panel was sceptical about the indicative classical coliseum-style architecture with arcade detailing for the concert hall as this style does not initially resonate with the character of the New Town. However, the Panel was not averse to a contemporary response with a take on classical architecture so long as it is respectful to the site and its context. The Panel confirmed that the detailing and materials will be critical to achieving this aim.

3.7 The Panel felt that the link building could be better concealed as this looked to clash with the rest of the proposal and Dundas House.

3.8 The Panel agreed that lighting of the buildings and their setting would be an important consideration.

3.9 The Panel advised that sandstone should be used if masonry is proposed and glazing would help to lighten the built form.

3.10 The Panel wishes to see a robust design which can stand the test of time.

#### 4 Public Realm

4.1 The Panel strongly emphasised that the discovery of the development as a 'jewel' from the surrounding lanes should be enhanced by a coherent and high quality public realm which links seamlessly (physically and visually) to its context.

4.2 The Panel was supportive of the increased activity that would be created from the proposal and encouraged the use of ground floors to maximise this. The Panel advised that the public realm should create an engaging setting for the surrounding buildings.

4.3 The Panel considered that the built form could come out of a beautiful 'carpet' of materials set out in the public realm. The Panel stated that the use of simple, elegant and high quality materials will be key to creating a coherent, welcoming and active public realm. Careful use of hard and soft materials will also be critical.

4.4 The serviceability of the site needs to be carefully considered and the Panel was supportive of using an underused unit space within Multrees Walk as a service area for the development to separate service vehicles from the pedestrian environment.

4.5 The Panel noted that public and private spaces should be appropriately delineated.

4.6 The Panel emphasised the importance of maintaining the 'set piece' of Dundas House, railings and gates, and noted its significant contribution to the proposal's setting therefore cautioned against any substantive changes.

## 5 Permeability

5.1 The Panel was supportive of the aim to increase pedestrian permeability into and through the site. The Panel stated that links should be barrier-free and accessible for all users. The Panel stated that the emphasis should be placed on routes through rather than buildings across.

5.2 The Panel suggested that the space under the linked overhead walkway between the concert hall and ancillary buildings could be enlarged, creating strong views into the site and encouraging pedestrian use.

## 6 Use

6.1 The Panel was supportive of the use of the site for a music venue and suggested that further links could be made with University of Edinburgh's School of Music.

6.2 The Panel was concerned that the proposal may displace existing residents if it impacts negatively on the amenity of neighbouring housing. This needs to be carefully considered.

## 7 Security

7.1 The Panel advised that early discussions with security advisors should be held to build in any counter-terrorism elements to the proposal.

7.2 The Panel stated that a good security strategy including requirements for lighting/CCTV/passive surveillance should be built into the proposals at an early stage.

### **Historic Environment Scotland - response dated 15/01/2019**

*Thank you for your consultations which we received on 13 September 2018. We have considered them in our role as a consultee under the terms of the above regulations.*

*In relation to both the planning application and the EIA consultation, our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories. We have a separate remit regarding listed building consent, concerning works to Category A and B listed buildings, demolition, and applications by planning authorities.*

*For this reason, we have separated our advice into three sections, one under each set of regulations. As there are two listed building consent consultations, we have stated our position separately for each.*

*You should also seek advice from your archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.*

#### *Our Advice*

##### *Listed building consent*

18/07127/LBC

*We are content that these proposals for the rear garden of 35 St Andrew Square would not have a significant adverse impact on the special architectural and historic interest of the building. We therefore have no detailed comments on this application.*

18/07730/LBC

*We are content that the proposed demolitions, alterations and extension to Dundas House would not significantly diminish the special architectural and historic interest of the building. However, we consider there would be a significant impact on the setting of the building, which we have commented on under the associated application for planning permission below.*

*Our detailed comments on this LBC application are given in Annex 1 of this letter.*

*Planning application 18/04657/FUL*

*We consider that there would be a significant adverse impact on the setting of the Category A listed Dundas House, affecting some, but not all, key views of the building. We therefore advise that this should be taken into account in the decision making process. However, we are content that this impact would not significantly affect the special interest of the building, and does not raise issues of national interest for our remit. We therefore do not object to the planning application.*

*Our detailed comments on the planning application are given in Annex 2 of this letter.*

*Environmental Impact Assessment*

*We are content that sufficient information has been provided to come to a view on the planning application. We are content with the scope of the assessment and its methodology.*

*We have comments on the assessment itself and its conclusions. These are given in Annex 3 of this letter.*

*Further Information*

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues in the national interest for our historic environment remit, and therefore we do not object.*

*Our decision not to object should not be taken as our support for the proposals. The applications should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.*

*This response applies to the applications currently proposed. An amended scheme may require another consultation with us.*

*Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online. Technical advice is available through our Technical Conservation website.*

*Historic Environment Scotland*

#### *ANNEX 1 Listed building consents*

*Your Council has consulted us in relation to works to two Category A listed buildings, which include the potential impacts on their setting. However, we have concentrated on assessing the impact on setting through the planning application process in Annex 2.*

*Our Managing Change guidance note on Extensions is a relevant consideration in assessing this application. In this instance, however, the guidance which it can offer is necessarily limited, as the most significant impacts of the proposed development relate to the setting of Dundas House. Although the application involves the extension of Dundas House, due to the depth, visibility and accessibility of the site, we consider the proposals would appear, like the rising St James hotel complex behind, to be part of the 'backdrop' of an urban townscape.*

*Our specific policy consideration in assessing applications for LBC is given in the Historic Environment Policy Statement at 3.47. This paragraph relates to alterations which would have an adverse impact on the special interest of the listed building.*

*18/07127/LBC - Application for listed building consent for associated proposed works, including demolitions, new boundary treatment and public realm (35 St Andrew Square)*

*We are content that these proposals for the rear garden of 35 St Andrew Square would not have a significant adverse impact on the special architectural and historic interest of the building. We therefore have no detailed comments on this application.*

*18/07730/LBC - Application for listed building consent for proposed demolitions, alterations, and extension (Dundas House, 36 St Andrew Square).*

#### *Demolition*

*The proposed demolition works primarily involve the 1960s office block by Glasgow architects Gratton & McLean. We do not consider that this block contributes to the special interest of Dundas House, and therefore do not object to its demolition. We are also satisfied that the other proposed demolitions, or removals, relating to secondary areas to the rear of Dundas House, would similarly result in no significant loss to the special interest of the listed building.*

#### *Extension*

*The extension, to form the proposed new music venue, is planned to connect with the rear facade of the banking hall, itself a mid C19th extension to the original Dundas House. In contrast to the relatively concealed 1960s block it would replace, the new structure would rise tall above the listed building, and expand beyond it to the rear on both north and south sides.*

*Our Managing Change guidance note on Extensions states that extensions should ordinarily be subordinate in both scale and form. In this sense, the proposals would be contrary to the advice offered by this guidance. However, as above, in this instance we consider that the key impact of the proposed development would be on the setting of Dundas House. We have assessed this impact as part of our advice on the planning application, with reference to our relevant Managing Change guidance on Setting. (See Annex 2)*

### *Alterations*

*These comprise alterations and remedial works, mainly to external elevations of lesser significance to the rear (east) of Dundas House due to the demolitions and new build. Existing stonework would be made good, and there would be a general tidying up of rainwater goods, cabling and other pipework. A large section of the existing rear elevation stonework would be exposed internally as a feature of the foyer for the new music venue.*

*The works involve various works to the building including covering over lightwells and infilling redundant door and window openings, with a few new openings. These works, and the internal alterations to Dundas House, we consider to be relatively minor, affecting areas of lesser significance. Two exceptions are the proposed doorway link between the banking hall and music venue and the Banking Hall cash cage.*

*A key element of the overall scheme is to provide an internal double-door access link between Dundas House and the new music venue. While we are satisfied that this new doorway would be sympathetic to the fine interior quality of the banking hall, we suggest that the glazed panels for the banking hall doors be obscured to conceal the contemporary metal doors on the music venue side, or at any rate that this important element (ie, where new meets old) be conditioned.*

*The submitted ground floor plan shows some alterations to an existing cash point structure within the banking hall. No interior elevation/section drawings or images appear to be submitted to show how these alterations may affect the special character of the exceptionally important banking hall. Clarity on this point should be obtained. Externally, the proposed tall boiler flue at rear roof level, at the north east corner, would detract from the appearance of the roof, and a more concealed or mitigated solution would be preferable.*

*We are pleased to note that there are no proposals to alter the 19th century ornamental cast-iron-railed screen enclosing the front forecourt on St Andrew Square, an important feature of the category A listing. We would urge that the current proposals to include a large service vehicle access be appropriately managed, under the application for planning permission, to ensure there would be no disturbance to the gatepiers, gates, railings, and lamp standards.*

### *Conclusion*

*We are broadly content that the proposed direct physical interventions under 18/07730/LBC would not unduly diminish the building's special architectural and historic interest. However, as explained in Annex 2, we consider that the proposed extension would have an adverse impact on the setting of Dundas House, affecting some key views of the building.*

*We have therefore assessed the impacts in light of the policy considerations at paragraph 3.47a-d of HESPS, which concerns adverse impacts to the special interest of a listed building. In this instance, considerations b and d of this policy are relevant. Overall, on balance, we are content that the scale of the impact (3.47b.) on the listed building would not significantly harm its special interest. Therefore, we do not object to the listed building consent application.*

*We also note that the wider community benefits of the proposals (3.47d) may also be a consideration in decision making.*

### **Historic Environment Scotland - response dated 25/01/2019**

*Thank you for your consultation which we received on 24 January 2019. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations.*

*We understand that this consultation relates solely to the EIA regulations. We note that this consultation is to advise that the 2011 EIA regulations were quoted on your previous consultation letter, dated 13 September 2018.*

#### **Our Advice**

*We are content that our advice on this application and its accompanying environmental assessment, given in our letter dated 15 January 2019, is unaffected by this alteration. Our advice was given in reference to the 2017 EIA regulations, as quoted in our letter. We therefore have no additional or altered advice to offer at this stage, and our position remains as previously presented.*

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object.*

*Our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance. This response applies to the application currently proposed. An amended scheme may require another consultation with us.*

*Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online. Technical advice is available through our Technical Conservation website.*

### **Historic Environment Scotland - response dated 12/03/2019**

*Thank you for your re-consultations which we received on 27 February 2019.*

*Our comments below relate specifically to the design amendments, subject of your re-consultations, and should be taken into account together with our existing main response letter to these applications, dated 15 January 2019. Overall, we are satisfied that the amendments do not raise significant new issues for our interests, and that our position on the proposed development therefore remains the same.*

#### *Listed building consent applications*

*18/07127/LBC*

*As you will be aware from our main response letter of 15 January 2019, we are content that the proposals for the rear garden of 35 St Andrew Square would not have a significant adverse impact on the special architectural and historic interest of the building. We note the revisions, including deletion of the previously proposed retractable marker posts for the historic rear garden boundary line of 35 St Andrew Square, now proposed to be delineated by contrasting surface treatment as part of the wider public realm and landscape treatment for the development. We have no detailed comments to make on this revision.*

*18/07730/LBC*

*We are satisfied that the design revisions for the proposed music venue, including refinement of façade detailing/materials and crown parapet, do not raise new issues for us regarding the overall impact on the category A listed Dundas House. These revisions are mainly set out in the submitted revised Design and Access statement, chapter 16. Please also see our comments on the planning application below.*

*We are also pleased to note the revised proposals and additional information for Dundas House itself: to delete the previously proposed tall boiler flue; add opaque glazed panels for the banking hall new interior doors; and clarification of works to the existing cash point enclosure. These address the detailed comments we made on these specific proposals in our letter of 15 January.*

#### *Planning application*

*18/04657/FUL*

*We note that there is no change to the proposed new building in terms of its scale, height, mass, and site positioning. As the revisions relate mainly to the above mentioned refinement of the façade detailing/materials and crown parapet we are content that the changes do not raise significant new issues for our interests, including potential impact on the A listed Dundas House and its setting; the setting of other neighbouring A listed buildings; and the World Heritage Site.*

*We acknowledge the intention to further the mitigation of impacts through refinement of materials and creation of a simpler, more cohesive, backdrop to Dundas House. To assist with further consideration of this, we understand that arrangements are being made for the review of material samples on site, including mock up panels for the proposed honed and grit blasted precast concrete for the façades. We suggest that this includes sample panels positioned to the front of the site to allow comparison with Dundas House in close-up views from St Andrew Square.*

*We have no more detailed comments to make on the planning application, and our advice remains as previously stated*

### *Environmental Impact Assessment*

*We note that no further assessment of impacts on our interests has been provided in the EIA Addendum. We therefore have no further advice to offer on this. We refer you to our previous response for our comments on the assessment and its methodology.*

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision-making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object.*

*Our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.*

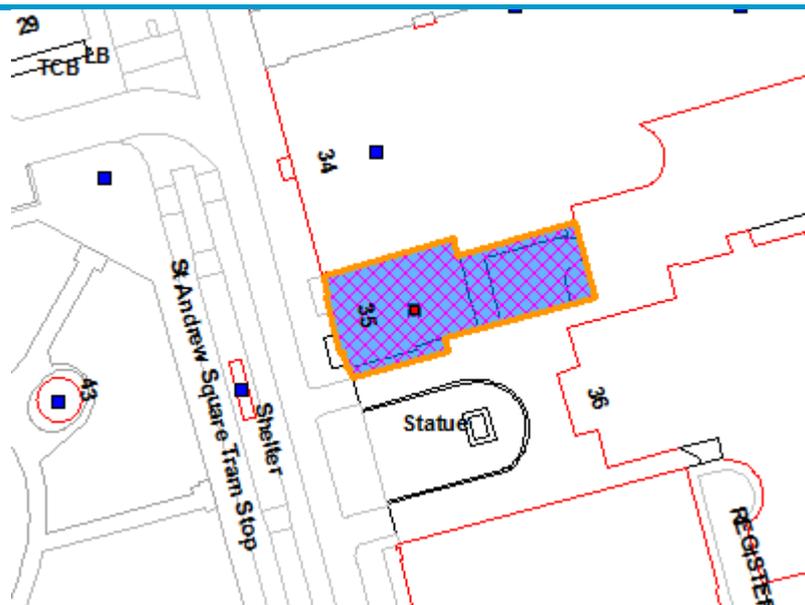
### *Further Information*

*This response applies to the application currently proposed. An amended scheme may require another consultation with us.*

*Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online*

*Technical advice is available through our Technical Conservation website.*

## **Location Plan**



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