

Development Management Sub Committee

Wednesday 7 March 2018

Application for Planning Permission in Principle 17/02227/PPP

At 2 Dewar Place, Edinburgh, EH3 8ED

PPP for hotel(s) (Class 7), office (Class 4), retail (Class 1), restaurant(s) (Class 3), pedestrian deck, bridge link + accesses from Western Approach Road, Dewar Place + Canning Street; detailed approval for siting, maximum height & limits of deviation of proposed buildings, partial demolition,+ refurbishment of façade of former electricity station (as amended).

Item number	7.5(a)
Report number	
Wards	B11 - City Centre

Summary

The proposed development would allow for the regeneration of this currently underutilised and constrained city centre site.

The range of uses proposed conforms to the general provisions of LDP policy Del 2 (City Centre) and the principles of the Exchange 2 Masterplan. The proposals would have the potential to deliver a significant contribution towards the area's physical and economic regeneration. However, in order to address the relatively low proportion of floor space allocated specifically for office use, a condition is included, requiring that the details for the allocation of uses at building 02 are reserved for approval.

The proposed scale and massing of the development is considered generally acceptable. However, concerns remain regarding the impact of the proposed building profile at top storey level on the surrounding townscape. A condition is included requiring further details of this element of the proposals, to allow for a more detailed assessment, under the provisions of LDP policy Env 4 (c).

The proposed facade restoration scheme would enhance the retained part of this listed building, in accordance with the relevant provisions of LDP policy Env 4 (Listed Buildings - Alterations and Extensions). These proposals would also accord with the opportunities for the re-use and retention of existing listed buildings, as highlighted in the West End Conservation Area Character Appraisal.

The provisions of a section 75 legal agreement would be required to secure the delivery of the proposed footbridge, the contributions towards junction improvements on Dewar Place and Morrison Street and the road traffic order required to implement the proposed footway works and the provision of a lift at site 01, to ensure suitable accessibility by disabled persons to the proposed footbridge.

Contributions will also be required through the legal agreement, towards the Edinburgh tram network, in accordance with the Council's guidance on Developer Contributions and Infrastructure Delivery.

It is recommended that the Committee approves this application, subject to the above mentioned conditions and requirements of an appropriate legal agreement.

Links

[Policies and guidance for this application](#)

LDPP, LDEL02, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES11, LEMP01, LEMP10, LEN01, LEN02, LEN03, LEN04, LEN05, LEN06, LEN07, LEN16, LEN20, LEN21, LEN22, LRET01, LRET02, LRET07, LTRA01, LTRA02, LTRA08, LDEL01, NSG, NSGD02, NSESBB, NSGSTR, NSDCAH, NSLBCA, NSMDV, CRPNEW, CRPWEN,

Report

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Recommendations

1.1 It is recommended that this application be Minded to Grant - Legal Agreement.

Background

2.1 Site description

The proposed development site, which covers an area of 1.24 hectares, lies on the south west side of the city centre. The site slopes upwards from north to south, towards Morrison Street, on its Dewar Place frontage.

The site fronts on to the east side of Dewar Place and is flanked to the east by the West Approach Road. The 5 to 6 storey building at Conference House lies immediately south of the site and fronts on to Morrison Street. Existing office buildings including Exchange Tower and Conference Exchange, which front on to Canning Street are located to the north of the site. Planning permission was recently granted for a hotel development on the vacant land opposite the site, on the west side of Dewar Place (application reference 16/00700/FUL).

The site is currently occupied by an existing electrical sub-station with vacant land to the north east. The retained frontage of the electricity company's former offices lines the site frontage on Dewar Place. The only part of this building which is currently retained intact is the three storey, vacant office accommodation, situated at its south west end. The building is category 'B' listed (listed building reference LB47721) (listed 23 March 2001). Two vents from the remaining electricity substation are located on the east side of this building and are to be retained in operation. The northern section of the site is underlain by railway tunnels. On the northern part of the site, the original transformers and switch room are located. These were decommissioned as part of the new substation development.

The boundary of the Old and New Towns of Edinburgh World Heritage Site lies mainly to the north west of the application site, with a small part, containing no buildings, being located within its north east corner.

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

This application site is located within the West End Conservation Area.

2.2 Site History

30 May 2007 and 15 July 2007 - Planning permission and listed building consent granted for demolition of substation building, restoration of Dewar Place façade and construction of a replacement substation facility, podium deck and pavilion space (07/02421/FUL and 07/02421/LBC).

25 February 2010 - The principles of the Exchange 2 Masterplan for Dewar Place were approved by Planning Committee.

19 May 2011 - Planning permission and listed building consent granted for amendments (including revised facade design & removal of roof top restaurant) to planning permission ref: 07/02421/FUL for construction of an electricity substation development. (11/01064/FUL and 11/01064/LBC). The approved works have been mainly implemented.

09 March 2015 - Planning permission granted for reconfiguration of access and erection of external staircase and safety barrier. (15/00354/FUL).

18 May 2017 - application for listed building consent submitted for demolition of original electricity generating station, part demolition and part refurbishment and integration of retained facade into hotel building (17/02228/LBC). This application is currently under consideration.

18 May 2017 - Application for demolition of transformers and switch room building (17/02229/CON). This application is currently under consideration.

Planning History in respect of adjacent land to west:

6 June 2017 - Planning permission granted for erection of hotel and associated facilities on west side of Dewar Place (16/00700/FUL).

Main report

3.1 Description Of The Proposal

The application is for planning permission in principle for the development of a mixed use scheme comprising hotel(s) (Class 7), class 4 office building(s), retail (Class 1), restaurant(s) (Class 3), pedestrian deck, and bridge link and accesses from Western Approach Road and Canning Street. The proposals include the details for the siting, maximum height and limits of deviation of the proposed buildings, partial demolition and refurbishment of the façade of the listed former electricity station.

Three buildings are proposed, the largest of which is located on the site of the existing electricity substation at site 01. The building at site 02, immediately to its north east, adjoins the building at site 01 up to podium level. The building at site 03 sits on a smaller site to the north east. It is separated from the remainder of the development by the line of the existing railway tunnels. The current proposals constitute an amended scheme (SCHEME 4), the proposals for which include:

Building at site 01

This building is proposed over the existing electric sub-station podium. It includes some accommodation behind the retained part of the listed building facade, at the south end of the site. The building has six levels above the podium. The maximum AOD level is 94.05 metres. Limits of deviation of the building exterior are included on the rear elevation and at podium level. The podium level contains the main pedestrian links to the proposed bridge over the West Approach Road, from both sides of this building. The gross maximum floor area is 15,100 sq metres. The proposed uses include Class 3 restaurant at ground level and Class 4 business, hotel and/ or class 3 restaurant uses at podium level and Hotel uses at upper levels.

Building at site 02

This building is 10 storeys in height. The maximum AOD level of this building is 94.15 metres.

The proposals include provision for a one metre limit of deviation in both directions, on all elevations apart from the West Approach Road elevation. The gross maximum floor area is 10,930 sq metres. The proposed uses at podium level include hotel reception, retail and food and drink uses. All other floor levels are allocated for either hotel or class 4 office use, with the exact mix of uses proposed for approval under the application for the approval of reserved matters.

Building at site 03

This building is seven levels in height. Its maximum AOD height is 89.60 metres. The proposals include the provision of a one metre limit of deviation in both directions, on both its north, northwest and south sides. The gross maximum floor area is 3,260 sq metres. The proposed uses are retail, food and drink and class 4 office use at ground level and business use at all other floor levels.

Works to Listed Building

The proposals to the retained part of the listed building include:

- Down-taking of interior of remaining three storey office floorspace at the south west corner of the building, to form the hotel entrance lobby at podium level, with reinstated floor plate, providing guest accommodation at upper level.
- Part demolition and retention of slate roof above retained façade at south and west corner of building.
- Installation of glazed doors and surround within section of facade on Dewar Place to form single storey height, hotel entrance.
- Window alterations, including installation of opaque glazing, to blocked up windows on west elevation.
- Alterations at south west corner of building to form new entrance to public route to footbridge over West Approach Road.

Vehicular access proposals

The proposed service access for building 01 is from the existing access on the east side of Dewar Place. The service access to buildings 02 and 03 is from a proposed junction on the north side of the West Approach Road. An existing access to the site from Canning Street, is proposed for access for the disabled drivers' vehicle parking areas, to be accommodated within building 03.

Pedestrian/Cycle Access provision

The proposals include:

- Provision of five metre wide pedestrian and cycle bridge over West Approach Road at podium level, towards Conference Square.
- Formation of pedestrian link at ground level, on northern boundary of site, leading from northwest end of block 1 on Dewar Place, to the public footway at the junction of Canning Street and the West Approach Road to the north east.
- Installation of stairway and cycle chute, with entrance in retained facade of listed building, at its south end, providing access to the podium.
- Provision of an indicative vertical circulation route leading to podium level, between buildings 01 and 02.

Public realm proposals include the provision of indicative areas of soft landscaping and hard surfacing on the shared access route, to the north of the site, as well areas of public realm at podium level, with indicative seating provision, to the north and east of building 01.

PREVIOUS SCHEMES

SCHEME 1

The overall height of proposed building at site 01 was 96.85 metres AOD. The building included one more storey level than currently proposed and the floor area was greater. There was no provision for office use at podium level. The building had a different massing arrangement at top floor levels.

The overall height of building at site 02 was 95.1 metres AOD. 3.35 metres greater than in the final scheme. A proposed separate ground floor level storage unit was proposed, adjacent to block 03.

A three storey glazed entrance was proposed on the south facing, Dewar Place façade of listed building, requiring demolition of full height section of façade. A full height open foyer space was proposed behind the corner of the listed building on its Dewar Place corner façade. The new build hotel was set back by 3.1 metres on its west elevation and 1.7 metres on the south elevation from the building façade.

SCHEME 2

The overall height of building at site 01 reduced by 2.8 metres to 94.05 metres. The height of building at site 02 was reduced to 96.80 metres, as result of loss of original top storey level. A set back on all sides was introduced to building 02 at top floor level. The ground floor unit adjacent to building 03 was removed.

The scale of entrance lobby was reduced from 3 storey to 1 storey. The set back of the new building frontage behind the listed building frontage on Dewar Place was increased to 3.1 metres on both elevations. Integral hotel lounge accommodation was proposed, above the entrance to the public route.

SCHEME 3

The scale and massing of the proposed buildings was identical to that currently proposed. However, the limits of deviation proposed at podium level allowed for more flexible building footprints. Building 02 was allocated for mainly hotel use.

Supporting Documents

The following documents were submitted in support of this application and are available to view online:

- Pre-Application Consultation (PAC) Report.
- Planning statement.
- Transport Statement and Supplementary Statements 1 and 2.
- Design and Access Statement, and Supplementary Statements 1 and 2.
- Confirmation note on building levels and height.
- Note on estimated use areas.

- Flood Risk and Surface Water Management Plan.
- Protected species survey.
- Socio-economic Impact Note and Economic Impact Note.
- Road Safety Audit, update and response.
- Applicant's Summary response to Consultees.
- Applicant's suggested Conditions and Section 75 documents.

Environmental Statement - includes assessment of following impacts:

- Air quality, biodiversity and ecology, cultural heritage and archaeology, daylight and sunlight, electromagnetic fields, flood risk and drainage, ground conditions, noise and vibration, townscape and visual, transport and the economy.
- EIA Supplementary Statements on Cultural Heritage Assessment, Townscape and Visual Impact Assessment.
- Supplementary Photomontages.
- Daylight Study - Dewar Place.

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.

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

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.

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?

3.3 Assessment

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

- a) The principle of the proposed development is acceptable and accords with relevant development plan policies;
- b) The impacts on the listed buildings are acceptable;
- c) The layout, massing and height of the proposed development is acceptable;
- d) The proposals for public realm and connectivity are acceptable;
- e) The proposals will preserve and enhance the character of the conservation area;
- f) The proposals would have any adverse impacts on the World Heritage Site;
- g) The proposals adversely affects the amenity of neighbouring occupiers;
- h) There are any adverse roads authority impacts;
- i) There will be an adverse impact on biodiversity;
- j) There are any adverse impacts on archaeology;
- k) The proposal will affect existing infrastructure;
- l) There are any other environmental impacts;
- m) The proposal meets the Council's requirements in respect of sustainability;
- n) Impacts on equalities or human rights impacts and
- o) The matters raised in representations are addressed.

a) Principle of proposed uses

The site is identified in the Edinburgh Local Development Plan (LDP) as within the City Centre and is subject to the provisions of Policy Del 2 (City Centre). It is also identified in the City Centre Overview Map, as a location where major change is either proposed or anticipated. The requirements in principle for development under LDP Policy Del 2 include:

- a) *Comprehensively designed proposals which maximise the potential of the site in accordance with any relevant development principles, development brief and/or other guidance;*
- b) *A mix of uses appropriate to the location of the site, its accessibility characteristics and the character of the surrounding area; and*
- c) *Where practical, major mixed use developments should provide offices, particularly on upper floors. At street level, other uses may be more appropriate, to maintain city diversity, especially retail vitality on important shopping frontages.*

This policy guides development in the city centre to ensure that proposals provide an appropriate mix of uses and are of high quality of design, taking account of the characteristics of the historic environment. Given the demand for office space in the City Centre and the importance of office jobs to the economy, the policy requires office provision to be included in major, mixed use developments, wherever practical.

As the site is included within the area of the Exchange 2 Masterplan, the proposals also require consideration in terms of their compliance with its general principles, which were supported by the Planning Committee on 25 February 2010. In terms of the mix of uses, the masterplan states:

the redevelopment will be predominantly led by office (class 4) floor space. However, it further states that the redevelopment presents an opportunity for a range of complimentary uses, including small scale retail uses, restaurant, café and bar uses, hotel uses and flats.

The proposal to include office space provision, complies in principle with the provisions of LDP policies Del 2 and Emp 1 (Office Development), which also supports high quality office developments in the city centre. The city centre remains the prime location for office development, due to the proximity to other office, service and transport hubs. To meet continuing demand for office space in the city centre, major development opportunities are expected to include significant office provision, and where possible large floor plates, as part of the overall mix of uses. The proposal to include class 4 business use at the site, complies in principle with the provisions of this policy. However, the comparatively limited proportion of such provision requires further consideration in terms of the extent of compliance with these policies.

LDP policy Del 2 allows for provision for other uses, such as the proposed hotel accommodation, providing the overall mix of uses is appropriate to the site's location and characteristics, including accessibility. Hotel use is supported under LDP policy Emp 10 (Hotel Development), where such developments may be required to form part of mixed use schemes, if necessary to maintain diversity and vitality. The application site is situated in close proximity to the Edinburgh Conference Centre and as such, has the potential to provide suitable accommodation at a convenient and accessible location for the conference centre and other local business users.

The proposals to include retail and class 3, food and drink uses, at ground and podium levels, where they are easily accessible to the public, are also supported in principle under LDP policy Del 2. They would have the potential to provide an element of diversity in this area of the city and encourage additional footfall through this area from Conference Square. The complementary uses, including retail establishments are also generally supported under the Masterplan, in order to maintain diversity and vitality. The amenity aspects of such uses are considered in detail in paragraph 3.3) (f).

Residential use, is also encouraged under LDP policy Del 2, at suitable city centre sites to help meet housing need and create strong sustainable communities. However, the applicant's Planning Statement reports that there has been no interest from potential investors in such uses, owing to amenity considerations, associated with the site's proximity to the West Approach Road. It is accepted that any residential development at this location would require care in its design and siting, in order to ensure satisfactory standards of amenity for future occupiers. However, notwithstanding such considerations, the failure to provide any such accommodation within the overall development site, represents a lost opportunity to provide much needed housing accommodation, within this accessible city centre location, where it would help to meet such demand and strengthen the local community.

Whilst the uses proposed partially accord with those sought at city centre locations, under policy Del 2 and other relevant LDP policies, the proposals raise concerns in terms of the appropriateness of the proposed balance of mixes. In particular, with respect to the relatively low level of office provision, in comparison with the overall scale of the development proposed at this prime city centre location, where development would be expected to be office led.

A report to the Economy Committee in November 2016 stated that the office sector of Edinburgh is currently performing strongly in terms of take-up, achieved rents and investor interest. Rising take-up, coupled with a relatively weak development pipeline and the ongoing loss of existing office stock to alternative uses, is placing growing pressure on the supply of office space in Edinburgh, with a particular shortage of grade 'A' office space. This level of demand is demonstrated through a review of recent statistics (source - Ryden), which identify that the available office space in Edinburgh in March 2017 was 1.7 million square feet, the lowest figure on record since 2001, while the take-up in the second quarter of 2017 was over 535,000 square feet, the highest ever recorded quarterly figure. As a result of this shortfall, there remains a need to ensure that where significant opportunities for redevelopment within the city centre arise, they can where 'practicable' provide offices.

In the applicant's supporting information, an explanation is put forward as to why a greater proportion of office development is not proposed, including the technical challenges of providing Grade 'A' offices. The Planning Statement indicates that full cost and viability reviews (not supplied with supporting information) have identified the need for the development to be predominantly focused on hotel provision, partially as a result of site constraints posed by existing infrastructure, including the underlying railway tunnels. The statement concludes that hotel use is the only viable option.

It is estimated that the extent of office space proposed under SCHEME 3, could be expected to directly support between 289 and 470 full time equivalent (FTE) jobs (if fully occupied), giving a median figure of 380 FTE jobs (based on findings of EIA in relation to economic impacts). In comparison, the proposed hotels could be expected to directly support a median total of 330 FTE jobs, depending on whether the proposed hotels are budget or luxury establishments, if fully occupied. The applicant states that both hotels would be for occupation by four star establishments, although this cannot be controlled through the planning process. Further employment opportunities would also arise, through the supporting of jobs in the local economy and in the supply chain.

It is also of note that the office elements in SCHEME 3, would account for an average of approximately 15% of the total gross floor-space delivered, but 53% of the projected employment and 80% of the projected Gross Added Value (GVA). These figures demonstrate the relatively high employment density of office buildings and high average output of the sectors that typically occupy offices, in comparison with the other uses proposed.

The income derived from the tourist industry also makes a strong contribution to the city's economy, which has an annual occupancy rate of 79% for four and five star hotels. The 2016 report on Hotel Supply and Demand reported to CEC Economy Committee stated that there were 46 developments (accounting for 6,339 bedrooms) in the pipeline. Although this figure will now have changed, there are currently a number of hotels under construction or with extant planning permission in the city centre.

In response to concerns raised by the Planning Authority, concerning the modest level of office space provision, the proposals have been amended in SCHEME 4, to include an option for either class 4 office, or hotel use at building 02, with the final use allocation being reserved for approval under the relevant application for approval of reserved matters (AMC). The provision of up to a further 7, 519 m² office floor space, through the potential use of the building at site 02 for mainly office use would go a significant way towards providing a more appropriate mix of uses at this site and addressing the related demand for office floor space at this central location, in accordance with both the provisions of LDP policy Del 2 and the aspirations of the Exchange 2 Masterplan

In conclusion, the proposed range of uses complies in general with the requirements of LDP policy DEL 2 (City Centre), Emp 1 (Office development) and Emp 10 (Hotel Development). The proposals in SCHEME 4 for mainly hotel use at building 01, office use at building 03 and the land use reserved at building 02, for either office or hotel use, would allow scope for a mix of uses more closely aligned with the overall objectives of the LDP and the principles of the Exchange 2 Masterplan than the previous schemes and on balance, is considered acceptable.

It is recommended that the land uses of buildings 01 and 03 are approved and the use of building 02 is not approved, but instead is reserved for approval under the relevant AMC application.

b) Impact on Listed Buildings

The former electricity station headquarters at 2 Dewar Place is a category 'B' listed building (Listed Building reference LB47721) which was built in 1894 to a design by Robert Morham.

The Historic Environment Scotland (HES) listing for this building states that:

The Electric Light Works former power station was constructed in the Italian palazzo style. In 2017, only the Dewar Place façade of the building remains, this being shored up from the interior and on the roof of the modern electricity sub-station. The windows and other openings onto Dewar Place have been infilled, and some vandalism of the exterior has taken place. The southern wing was built in 1898. It was used as offices and the upper floor contained the company superintendent's house. The ground floor is currently used as office space.

LDP policy Env 2 (Listed Buildings - Demolition) provides that proposals for the total or substantial demolition of a listed building will be supported only in exceptional circumstances.

The provisions of this policy are not relevant to this application as the majority of the interior of this original listed building has been demolished to make way for the installation of a replacement electricity substation, with a podium above, as approved above under the 2007 and 2011 planning and listed building applications. The only parts of the original listed building which remain, are the listed facade on Dewar Place and its corner return, and the now redundant office accommodation, associated with the former electricity headquarters at the south end of this building, as referred to in the Listed Building description.

The proposals for demolition under the current application relate to the rear elevation of the southern part of this building, and a section of the original roof on Dewar Place frontage, along with its internal floor plates. The original façade would be retained, with the exception of down takings, where new entrances are proposed. These alterations to the listed building fabric are required, in order to allow for the new development above this building and are assessed under the terms of LDP policy Env 4 (Listed Buildings- Alterations and Extensions).

LDP Policy Env 4 seeks to preserve listed buildings, their setting or any features of special architectural or historic interest that they possess. It states that proposals to alter or extend a listed building will be permitted where:

- a) Those alterations or extensions are justified;
- b) There will be no unnecessary damage to historic structures or diminution of its interest; and
- c) Where any additions are in keeping with other parts of the building.

i) Proposed Alterations

The submitted proposals, which include the refurbishment of much of the original slate roof on the former office accommodation, have allowed for the retention of a greater extent of the original building fabric and architectural integrity than previously proposed. The finalised plans allow for a greater appreciation of the three dimensional form, particularly the distinctive corner elements of this building. The proposals for the re-instatement of previously blocked off window openings and other window alterations would enhance the building's character and appearance. Details of the design and materials will be reserved.

The proposals for the formation of a new entrance to the public stairway, leading to podium level and the entrance to the hotel, would result in the loss of some of the remaining listed building fabric. However, these alterations are considered justifiable given their function. These proposals would further serve to animate and enliven this building, enhancing its character and appearance, as well as that of its setting. Details will be required at the approval of reserved matters stage.

ii) Proposed Extensions

The principle of constructing new development above this building was approved under the 2007 and 2011 planning and listed building applications (paragraph 2.2 (Site History)). The indicative illustration, included in the 2010 Masterplan, identified the opportunity for substantial development in this area of the overall masterplan site. However, the building line was set back considerably further from the original facade of the listed building than currently proposed. As a result, it was more respectful of the scale and character of the listed building.

In response to concerns raised regarding the potential impacts on the building's character, the proposed development has been set back further on both elevations. This set back has improved the relationship between the original and proposed new parts of the building. The significantly greater set back proposed at the two top storey levels, provides a visual break in the massing at this height and reduces the impact on the setting of the listed facade. However, the overall bulk of the proposed extension remains significantly closer to the original facade than depicted in the indicative Masterplan option. The extension would require careful consideration, in terms of its design and choice of materials to help mitigate potential adverse impacts. The final detailing will be subject of a condition at the approval of reserved matters stage.

The proposed alterations, including the re-instatement of former windows and formation of public entrances, would enhance aspects of its character and appearance, by activating and enlivening its frontage. The use of the above mentioned conditions, requiring the submission of massing details at top floor level, as well as full design details and materials would allow these aspects to be assessed more fully at AMC stage, in terms of their impacts on the character and appearance of the listed building. The detailed proposals for the extensions will also require assessment under a further application for listed building consent.

iii) Impact on the setting of neighbouring listed buildings

LDP policy Env 3 provides that development within the curtilage or affecting the setting of a listed building will only be permitted if not detrimental to the appearance or character of the building or its setting.

Over 100 other listed buildings are within 100 metre radius of the site. The findings of the EIA conclude that only two of these buildings would be subject to potentially significant impacts, mainly as a result of their relatively close proximity to the proposed development. These are the category 'A' listed buildings at 109-115 Morrison Street, and the category 'B' listed, former Torphichen Street Education Centre.

109 -115 Morrison Street along with 1-25 Gardner's Crescent, are included in the HES listing (LB ref 28797). These buildings consist of four storey tenement blocks, which are an integral part of the planned Edinburgh New Town. The EIA identifies the effect on these listed buildings as 'slight' and 'minor/moderate' effect. The proposed development would not have a significant adverse impact on their setting, as this listed block is separated from the application site by the neighbouring office building at Conference House, which would partially block views of the proposed development.

The Torphichen Street Education Centre is described in the HES listing, as a two to three storey symmetrical school in classical style, designed by Robert Wilson in 1887. The predicted effects in relation to this building are described as 'slight' and 'minor'. It is clear that the proposed development would have some impacts on the setting of this listed building, by reason of its scale and proximity to this relatively modest sized building. However, the relationship with this neighbouring listed building will be largely altered by the siting of the proposed hotel, on the opposite side of Torphichen Street. The resulting effects of the proposed development on this building's setting would not be significant.

The visual representations included in the Townscape and Visual Impact Assessment have highlighted some potential adverse impacts on the setting of the Category 'A' listed buildings, in the wider area, including at Melville Crescent/ Walker Street, as a result of the profile of the new building rising above the roofline of these listed buildings.

The potential for adverse impacts is also found in relation to longer distant views of Edinburgh Castle, as a result of the building massing. These impacts are considered in more detail in paragraphs 3.3 (c) (Layout, Height and Massing) and 3.3 (e) (Conservation Areas).

(c) Layout, Height and Massing

i) *Layout*

LDP policy Des 2 (Co-ordinated Development) promotes a comprehensive approach to redevelopment and regeneration, wherever possible, and the preparation of masterplans, to identify the full design potential for creating successful places.

In terms of siting considerations, the supporting documents explain that the layout of the development is constrained by the existing infrastructure and structural limitations above the podium and the workings of the underlying substation, as identified in the Exchange 2 Masterplan. The layout of the development is further restricted, in comparison with the original Masterplan site, through the loss of the plot to the northwest, at the corner with Torphichen Street, where a hotel development has been approved and Conference House to the south.

The proposed development above the electricity station podium reinforces the existing building line and plot width on Dewar Place, with its increased height and massing taking reference from taller, contemporary buildings to the east, in the Exchange district. The proposed replacement of the redundant electricity equipment and vacant land, with the new development at building 02, would establish a stronger frontage on this main approach road and strengthen its urban character, as encouraged in the Edinburgh Design Guidance. The breaks in massing between buildings 01 and 02 at podium level allow for visual relief on the West Approach Road, whilst also providing for new access routes from the proposed footbridge.

The proposals to form new pedestrian and cycle access routes and associated areas of public realm, would also allow for connections through the wider area, improving coherence with in this currently disconnected urban area, in accordance with the provisions of LDP policy Des 2.

ii) *Heights, Massing and Views*

LDP policy Des 4 (Development Design - Impact on Setting, states that planning permission will be granted for development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to height and form, scale and proportions, including the spaces between buildings, position of buildings and other features and materials and detailing.

The existing building at the site sits lower than the general height of development in the surrounding area. The drop in ground levels on the site frontage highlights its relatively low profile, in comparison with the more modern townscape to the east.

The Design and Access Statement states that the proposals take full account of the principles of the Exchange 2 Masterplan, in relation to Heights Massing Vistas and Views. Development Principle 6 - Height and Massing, states that development will be of a scale and mass that relates to the characteristic general height of the immediate locality and respects the location of the site between the historic fabric of tenement buildings and the Exchange District. The Masterplan further provides that the development should respect key views and give special consideration to the edge of the World Heritage Site.

The approach identified in the Masterplan 'preferred option' was for buildings to be stepped down behind the Dewar Place frontage and on the site's edges to south and northeast corner, where it borders on to more traditional lower rise development. The indicative massing Masterplan layout also depicts much higher rise development where it borders the West Approach Road and the modern office blocks. The maximum heights specified in the Masterplan are approximately 79 - 87 metres on the Dewar Place frontage and 93 to 97 metres, next to the West Approach Road and 84 metres to the north east where building 03 is proposed.

The proposed building height of approximately 94 metres at buildings 01 and 02, next to the West Approach Road, accords with the Masterplan height guidance. The proposed height of the frontage on Dewar Place at 87 metres falls just within the upper limit for this location. At approximately 90 metres, the proposed building at site 03 is 6 metres taller than that portrayed in the Masterplan options.

Overall the building massing and heights follow the general Masterplan principle in relation to heights and massing. The maximum height is also significantly lower than the neighbouring Conference House, respecting its setting as a local landmark building. Furthermore, it is somewhat lower than the office building at Exchange Tower, to the north, which as noted in the West End Conservation Area Character Appraisal as an incongruous feature in the townscape.

iii) *Assessment of impacts on views*

A views analysis study across the city was undertaken in conjunction with the masterplan, to identify and assess the impact which development may have on the landmark features that make up the iconic image of the city. The findings of a views analysis, helped inform the maximum heights and indicative layout identified in the Masterplan. This approach reflects the general provisions of LDP policy Des 11 (Tall Buildings - Skyline and Views) which provides that planning permission will only be granted for development which rises above the building height prevailing generally in the surrounding area where:

- a) a landmark is to be created that enhances the skyline and surrounding townscape and is justified by the proposed use.*
- b) the scale of the building is appropriate in its context.*
- c) there would be no adverse impact on important views of landmark buildings, the historic skyline, landscape features in the urban area or the landscape setting of the city.*

The Townscape and Visual Impact Analysis (TVIA) prepared as part of the EIA process relating to the current application includes over 25 viewpoints for consideration. The conclusions stated in the TVIA are that the development is of a height and scale similar to existing developments in this densely built up city centre location.

The Design and Access Statement details the measures intended to mitigate the potential for adverse effects on the townscape, including the introduction of a facade veneer, to provide variation in transparency, depth, rhythm, roofline articulation and materials. It is not possible to assess the potential benefits of facade treatment, or more detailed building profile design under the scope of the current application, or to rely on such mitigating impacts, as these are matters which would require full assessment under the relevant application for the approval of matters reserved by conditions.

The proposed massing plans have been revised to take account of some of the adverse impacts found in the TVIA, in previous schemes. These revisions have been beneficial in bringing about an improvement on adverse impacts originally found on a number of views. These improvements include a reduction in the extent of exposed roofscape, visible above Exchange Crescent, when viewed from Edinburgh Castle (viewpoint 16).

In the viewpoints from Rutland Street/ Rutland Square (TVIA viewpoints 26 and 28), the reduction in height achieved through the amended scheme, which includes one storey less of accommodation at building 03, has reduced the impact on the setting of the category 'A' listed buildings on this New Town Square. The proposed building continues to rise above the planned form of the lower rise, listed buildings on the northwest side of this Square. However, it is accepted that this impact does not detract to a significant extent from the setting of these listed buildings, or the character and appearance of the conservation area.

The finalised proposals nevertheless continue to give rise to concerns, in terms of the impacts of the proposed height, massing and siting of the development on the historic townscape from some aspects, as referred to elsewhere in this report.

In views of Edinburgh Castle and its rock, from Corstorphine Road, the massing and alignment of these buildings creates a continuous plinth-like form of development, lacking articulation. Although the finalised proposals no longer block views of the Castle Rock, its significant scale and strong horizontal alignment competes with the scale of the castle, its rock and views of these key landmark features. A similarly uncharacteristically strong horizontal profile is created by buildings 01 and 02 from this aspect, as found in views of Arthurs Seat from the public footpath on Corstorphine Hill (view point 24). These detrimental impacts, would not be sufficiently mitigated, through a variation in façade treatment. However, as indicated in par 3.3 (Listed Buildings), the use of an appropriate planning condition, requiring that the massing and heights of the top storey level of buildings 01 and 02 are reserved for approval under the relevant AMC application, would allow for such detrimental impacts to be overcome, through careful articulation at this level.

Furthermore, the horizontal massing of the development profile, conspicuous in views from Walker Street/ Melville Crescent (viewpoint 15), continues to impact on the setting of the New Town Conservation Area, by rising above the roofline of the category 'A' terrace of listed buildings on Melville Crescent and weakening the essential character of the Western New Town. However, this adverse impact could be mitigated through a refinement of building massing at top floor level. The above mentioned planning condition would allow for the further consideration of this matter at AMC stage, to ensure that such impacts are suitably addressed.

The proposals for height and massing, accord in part with the recommendations of the Edinburgh Urban Design Panel which state that consideration should be given to: *The potential impacts upon short and distant views as a result of the height of the proposed buildings.* However, as demonstrated through an understanding of the findings of the relevant TVIA, some adverse impacts would remain. These impacts may be overcome, through the use of the above condition.

In conclusion, the proposed layout of the development would result in many positive impacts on the local townscape and character, through the restoration of the existing facade and the strengthening of the existing building line and massing on this street frontage, in accordance with the provisions of LDP policy Des 4. The taller built form on the West Approach Road frontage, would also have positive impacts by reinforcing and enhancing the urban character, on this currently broken frontage. The proposals for the upgrading of the pedestrian environment would further enhance the area's character and help knit together the built form at this currently fragmented location.

The assessment of the resulting impacts of the proposed scale and massing of the development on the historic environment and skyline is further considered in paragraph 3.3 (c) (Conservation Areas) and 3.3 (f) World Heritage Site).

d) Connectivity and Public Realm

The proposals require assessment in terms of their compliance with the provisions of LDP Policy Des 7 (Landscape Layout).

The site is located between three different block configuration of different eras and patterns, as well as several disconnected areas of public open space, including Festival Square and Conference Square, and the green spaces on Rutland Square and Gardners Crescent. The Masterplan notes that the site currently serves as an island, with the large massing of the electricity buildings, and its mainly dead frontage blocking pedestrian access routes in most directions.

Under Principle DP 3 (Permeability) of the Masterplan, one of the main objectives was to provide the missing pedestrian link to and from Conference Square, across the West Approach Road, to and from the east and west, to Dewar Place. This link would connect the Exchange District at Lothian Road and Festival Square, to the Haymarket transport interchange.

Under the related Masterplan Principle DP 4, good quality public realm, alongside the improved permeability of the site, was seen as critical to the success of future development proposals. These routes and the related sequences of public spaces were noted as requiring to be welcoming, attractive and distinguishable, in order to efficiently guide people through the site. The wide spanned deck structure, together with the building layout shown on the indicative masterplan layout, provided for relatively direct access through the site from Conference Square, whilst at the same time, facilitating access to the north and south.

The five metre wide bridge currently proposed over the West Approach Road is significantly narrower than the widespan deck access route proposed under the 2008 Masterplan and does not provide the same scope and flexibility for pedestrian and cycle access provision across the site. However, it meets the requirements of the Council as Roads Authority, in terms of safety standards. This proposal would facilitate a new link to and from Conference Square, and contribute towards meeting relevant Masterplan objectives regarding improving permeability and pedestrian connectivity through the West End and Exchange District.

Notwithstanding the above, a number of potential limitations have been identified, in terms of the proposed overall arrangements for improving local pedestrian and cycle access provision and the public realm. The proposed bridge leads pedestrians and cycle traffic to a relatively modest area of public realm, facing onto the rear elevation of the proposed new building, with two routes leading to the stairs or the lift(s) at the north and south ends of building 01. The width of these routes initially gave cause for concern in terms of the quality of environment they would provide. However, provision for a minimum width of 5.3 metres and 3.5 metres on the respective north and south routes is included in the finalised plans, which would ensure reasonable standards of safety and amenity.

The proposed public stairway at the south west corner of building 01, leading to the bridge at podium level has a clear and legible entrance, leading from the retained listed building facade, which should encourage its usage. The provision of a chute for cyclists, would go some way towards addressing needs for improving cycle linkages in this area. However, the proposals include less advantageous arrangements for disabled persons and those with prams, who would be dependent on the use of a lift situated within the proposed hotel foyer. The applicant has stated that the lift would be kept available for public access. As there are no formal plans for the proposed lift, which is indicative only at this stage, an appropriate legal agreement is required, to ensure the inclusion of this lift at AMC stage and its provision on site, along with any operational requirements.

No details are provided regarding the form of the alternative vertical circulation route at the north end of building 01, or its potential contribution towards access inclusive arrangements. A condition is therefore included, requiring the provision of relevant details for assessment under the AMC application.

The 1.8 metre wide entrance proposed on the east to west pedestrian and cycle route, running from the north end of the electricity station building on Dewar Place to Canning Street, is inconspicuous and unwelcoming. The presence of a high wall on the boundary with neighbouring office premises, also screens the start of this route from view and exposes pedestrians to potential security risks. This route fails to meet the full provisions of LDP policy Des 7, as it is not sufficiently overlooked and raises concerns regarding safety in this respect. The owners of neighbouring land, to the north of the site, expressed interest during the consultation process, in participating in proposals to improve pedestrian access in this area. Although such arrangements are not part of the current proposals, their future implementation would not be prejudiced, as a result of the current proposals. This potential opportunity could result in greater improvements to local accessibility.

At the meeting of the Edinburgh Access Panel on 7 December 2017, the Panel expressed concerns regarding the following aspects of this proposal:

- Unclear and potentially inconvenient facilities for the proposed disabled access provision to the pedestrian footbridge.
- the potential for conflict between pedestrian and cycle traffic provision on the proposed footbridge and opportunity for the segregation of pedestrian and cycle access provision on this route.
- Need for the dedicated lift for disabled persons accessing the footbridge to be located at an easily accessible and conspicuous location.
- Requirement for clear signage, directing pedestrians to the lift facilities or alternative facilities, in the event that the lift is out of operation.
- Need for contingency plans, in the event that the proposed lift is out of operation, owing to maintenance issues.

It is confirmed that the footbridge would be wide enough to safely accommodate both pedestrian and cyclists and would meet with the requirements of the Council as Roads Authority. It is also confirmed that it would be possible to accommodate a bridge of an appropriate gradient within the allocated site.

Other proposals for improving pedestrian and cycle access provision, including the provision of a new signalised junction at Canning Street, close to the junction with the West Approach Road and the realignment of the junction of Dewar Place with Torphichen Street, to provide greater priority for pedestrians, are considered in paragraph 3.3 (h) (Roads Authority Issues). These provisions are generally supported by the Access Panel.

However, the proposals to install a taxi layby facility, occupying part of the public footway on Dewar Place are not acceptable in terms of pedestrian safety, as they would cause a significant impediment to pedestrian safety and convenience on the already narrow footway. A condition, requiring the removal of this layby and widening of the public footway on the east side of Dewar Place is necessary. These public realm improvements would provide a safer pedestrian environment, which makes provision for the additional footfall generated, as a result of the occupation of the proposed development, including the pedestrian footbridge.

The changes to the site area have limited the opportunities to improve permeability and connectivity to the wider area for both pedestrians and cyclists. Nevertheless, the proposals go some way towards addressing the terms of policy Des 7 (Layout Design), and principles of the Masterplan, in terms of providing safe and convenient access in and around the development site and providing connections with other networks, most notably the link with Conference Square. The shortcomings identified with respect to providing safety and convenience and meeting the needs of disabled people can be given further consideration, through a clause in the legal agreement.

Public Realm

The potential of the development to make a significant contribution towards public realm improvements are restricted, in comparison with that illustrated in the original Masterplan, owing to the reduced site area available and width of the bridge structure in comparison with the indicative deck structure. The reduced area of public realm available at podium level, will inevitably effect its quality, in terms of standards of sunlight provision and potential landscaping enhancements.

The main area of public realm at podium level, where access is provided to the proposed bridge structure, would encourage pedestrians and cyclists to use this connection with Conference Square, improving local accessibility and activity levels. The provision of retail and food and drink uses at this level has the potential to further encourage such usage, in accordance with the Masterplan objectives. A condition is included, requiring further details of the hard and soft landscaping proposals, including public seating facilities and an external lighting scheme. Details of the measures proposed to mitigate potential impacts of noise disturbance and air quality, as a result of traffic levels on the West Approach Road, will also be required under the terms of this condition. The proposals for pedestrian and cycle access improvements and public realm partially accord with the recommendations of the Edinburgh Design Panel, which seeks:

The development of a legible pedestrian route through the site, to link Dewar Place with Conference Square.

In conclusion, the proposals have the potential to result in significant improvements to the public realm in this area, in accordance with the provisions of LDP policy Des 8 (Public Realm and Landscape). However, as the application is in principle only, conditions are required, providing for full details of the proposals, for assessment under the relevant AMC application.

(e) Impact on Conservation Areas

The application site is situated at the western side of the West End Conservation Area. The north east boundary of the application site lies adjacent to the south west boundary of the New Town Conservation Area and the Old and New Towns of Edinburgh World Heritage Site.

The proposals require assessment in terms of their alignment with LDP Policy Env 6 (Conservation Areas - Development) which provides for the preserving or enhancement of the special character or appearance of conservation areas.

The outcomes of the Environmental Statement are that the proposed development would have no significant direct effects on the Edinburgh New Town Conservation Area, but could potentially have Minor/Moderate Adverse direct and indirect effects on Edinburgh West End Conservation Area.

Extract from the West End Conservation Area Character Appraisal:

The West End Conservation Area is a large diverse area with a rich mix of historical periods and stages of development... It lies on a gentle north facing slope, with the Western boundary abutting the World Heritage Site and the New Town Conservation Area boundaries. The eastern boundary abuts the Old Town Conservation Area boundary.

The application site is located at a transitional location in the Western part of this conservation area, close to the boundary with the Central part to the north, which as the Character Appraisal states:

is more characteristic of big city commercial districts which are untypical in an Edinburgh City Centre context.

In relation to the application site specifically, the Character Appraisal states:

At the rear of Canning Street, there are electricity sub stations, which through the use of lighting have been turned into 'public art'. These buildings, while overlooking the streets at ground floor level, do not provide activity and hence the streets have a feeling of emptiness.

The former electricity station offices and depot is also listed as one of three buildings of interest in this part of the conservation area, as is Conference House, a late 90s office building perched on the bridge next to the International Conference Centre overlooking the West Approach Road.

The proposals to integrate much of the existing facade and the corner elements, including the roof and turret of the category 'B' listed, electricity substation, which is identified as a building of interest in the conservation area, accords with the objectives of the character appraisal and in this respect would realise the opportunity to enhance the conservation area through the re-use and respective animation of this building.

The retention of this distinctive facade and other remaining external elements of the building at this prominent corner location, would allow it to continue to make an important contribution to the area's character and sense of place, in accordance with the objectives of LDP policy Des 3 (Incorporating and Enhancing Existing Features). The proposed listed building retention scheme generally accords with Masterplan principle DP 5 Townscape/Heritage.

As this is a PPP application, insufficient information is available at this stage to fully assess the impacts of the proposed listed building extension on the character of the remaining listed building and the contribution it makes to the identity of the conservation area. However, such potential impacts must be balanced against the overall benefits of the proposals, in terms of facade refurbishment, improvements to the public realm and permeability, and occupation of the site for economically beneficially uses. These proposals would also accord with the opportunity identified in the Character Appraisal:

to strike a balance between the Council's strong conservation and heritage policies and those policies to maintain the City Centre as a viable economic entity, allowing the area to respond to the challenges of a capital city centre.

Extract from the New Town Conservation Area Character Appraisal:

The Conservation Area is typified by formal plan layouts, spacious stone built terraces, broad streets and an overall classical elegance. The majority of buildings are of a standard type that expresses Georgian ideals of urban living.

The planned formal gardens throughout the Conservation Area introduce punctuation, emphasise views and provide amenity space within the discipline of the grid layouts.

Views and vistas were an important element in eighteenth century design and town planning, and the area has a variety of notable views. The New Town exploits the topography and the value of views both within and out from it to maximum effect.

The historic plan forms allied to the dramatic topography results in important terminated and long vistas and landmark features that respond to the changes in level.

Within the grid layouts, terminated vistas have been planned, using churches, monuments, buildings and civic statuary, resulting in an abundance of landmark buildings. The generally uniform heights of the New Town ensure that the skyline is distinct and punctuated only by church spires, steeples and monuments. The uniformity of building heights, allied to the wide use of formal gardens within the grid layouts, provides a background against which important features stand out and allows views across the city to be appreciated.

As referred to in paragraph 3.3 (c) (Layout, Height and Massing), the proposals are found to introduce a distinctive horizontal form, which rises above the roof line of the category 'A' listed New Town terrace, in views of the proposed development from Walker Street/ Melville Crescent. This aspect of the proposals would impact on the role played by the West End Conservation Area, in terms of serving as a buffer zone, to protect the setting of the Old and New Towns of Edinburgh World Heritage Site. The use of a condition, reserving details of the massing and floor plates of buildings 01 and 02 for consideration at AMC stage is included, to protect against such potential adverse impacts.

In conclusion, the proposals to retain and refurbish the existing listed building facade would enhance the character and appearance of the West End Conservation Area, in accordance with the provisions of LDP policy Env 6. The proposed new development above this building, at this prominent corner location would result in some adverse impacts on the character and presence of the remaining listed facade and the contribution it makes towards the character and appearance of this conservation area. However, on balance it is considered that such adverse impacts are outweighed by the beneficial impacts of the proposals, in terms of the proposed refurbishment and animation of the building through its use for economically beneficial purposes and related benefits to this area, in terms of improved activity and connectivity levels.

The impacts on the New Town Conservation Area in terms of the effect on views above the listed terrace on Melville Crescent, would be addressed through the use of a condition, relating to the massing of floor plates of buildings 01 and 02, at top storey level, as referred to above.

f) Impact on Old and New Towns of Edinburgh World Heritage Site

The boundary of the Old and New Towns of Edinburgh World Heritage Site (WHS) lies immediately to the north west of the application site, with a small section of public road falling within the site boundary. Whilst there is no development within this section of the site, which would have a direct impact on the World Heritage Site, the proximity of a development of this scale requires careful assessment, in terms of its potential impacts on the Site's Outstanding Universal Values. The WHS is protected by the conservation areas that lie within and overlap its boundary, as stated in the West End Conservation Area Character Appraisal. Furthermore, Principle 6 of the Exchange 2 Masterplan - Height and Massing, Vistas and Views states that:

'Special consideration must be given to the impact of the development onto the surrounding 18th and 19th century fabric, especially along the edge of the World Heritage Site'.

LDP Policy ENV 1 (World Heritage Sites) states that:

Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and/or the Forth Bridge as World Heritage Sites or would have a detrimental impact on a Site's setting will not be permitted.

This policy requires development to respect and protect the outstanding universal value (OUV) of the World Heritage Sites and their settings. Setting may include sites in the immediate vicinity, viewpoints identified in the key views study and prominent landscape features throughout the city.

In the case of the Old and New Towns of Edinburgh World Heritage Site, the Statement of Outstanding Universal Values identifies the following broad qualities:

- i) *The finest neo-classical revival buildings in Europe.*
- ii) *The integration of the New Town / classical architecture with the landscape.*
- iii) *Planned alignment leading to spectacular views and panoramas.*
- iv) *The remarkably consistent and coherent entity.*

In relation to criteria ii) and iii) it is demonstrated through an understanding of the TVIA findings, that the proposals would affect views of Edinburgh Castle and its Rock from Corstorphine Road. The impact on this key view would have the potential to impact on the setting of the World Heritage Site from this main approach to the city centre. These impacts demonstrate that the proposals in their current form, do not fully meet the requirements of LDP policy Des 11 - Tall buildings, in terms of safeguarding views of the Old and New Towns of Edinburgh World Heritage Site, or the provisions of principle 6 the Exchange 2 Masterplan, in terms of Height and Massing, Vistas and Views. However, as referred to in paragraph 3.3 (b) (Listed Buildings), such potential adverse impacts could be controlled through the use of a condition, reserving the massing of the top floor levels of buildings 01 and 02.

The impact on the view from Walker Street/ Melville Crescent, as referred to in paragraph 3.3 (e) (Conservation Areas), also demonstrates that the proposals have the potential to damage the setting of these category 'A' listed, New Town Buildings and have a detrimental impact on the Site's setting, contrary to the provisions of LDP policy Env 1 (World Heritage Sites). However, this impact would also be addressed through the use of the above-mentioned condition, thereby preventing any undue harm to the OUV of the Old and New Towns of Edinburgh World Heritage Site.

g) Impact on Neighbouring Amenity

The proposals require assessment in terms of their compliance with the provisions of LDP Policy Des 5 (Development Design -Amenity) which provides for the safeguarding of amenity standards of neighbouring occupiers, as well as providing for acceptable amenity levels for future occupiers. The closest residential properties to the site are the flats within the tenement building on the opposite side of Dewar Place.

The applicant's noise impact assessment identifies the most significant external sources of noise and vibration are from road traffic, the existing substation, and from the network rail underground rail line and ventilation shaft. This assessment identifies that mitigation measures will be required. A detailed noise and vibration assessment would be required under any relevant application for approval of matters reserved by condition (AMC), as insufficient information is currently available at this stage, to allow for such an assessment.

The application site is located close to the City Centre Air Quality Management Area. Environmental Protection has advised that the form and location of the development has the potential to create a canyon like frontage onto the West Approach Road. However, it is advised that providing sufficient open space is retained on either side of the proposed building at site 03, as indicated on the proposed plans, such impacts should not be significant, particularly given the lack of residential properties on the West Approach Road.

Other potential sources of impact on local air quality arising from existing plant and equipment on site are the extracts from the substation, the ventilation shaft serving the rail tunnel and the emissions from the emergency generator at the substation. The proposed development will require the existing flue of the emergency generator to be moved. Details relating to the relocation of this flue, which would be subject to only occasional usage, would be required at the AMC stage.

The ventilation extracts from the substation are solely for cooling and air ventilation and do not represent a source of air pollution. It has also been confirmed that the ventilation shaft which serves the railway tunnel will not impact on local air quality, as it will be fitted with a removable cap, as part of the development proposals and will only be used to allow access to Network Rail equipment.

Conditions are included, requiring details of proposed cooking odour ventilation equipment, dust mitigation measures, under the relevant AMC application.

Given the proximity of the site to the Air Quality Management Area and the potential for significant use of taxis serving the proposed hotel uses, the provision of an EV charge point has been recommended by Environmental Protection. An informative is included, recommending the provision of such a facility, as an appropriate mitigation measure.

A number of concerns have been raised by neighbouring occupiers regarding the potential impacts of construction noise and disturbance arising from the development. Such impacts are generally enforced by Environmental Protection, under the Control of Pollution Act. Informatives are included, advising the applicant of measures to be taken to ensure such impacts are minimised. It is expected that the measures recommended relating to the control of dust emissions would be included at the AMC stage of the application.

A daylighting study has been carried out by the applicant in relation to the tenement building on the opposite side of Dewar Place. The results have indicated that there would be an impact on daylighting to certain residential properties on Dewar Place. However, the study concluded that the reduction in daylight would fall within the limits permitted in the Edinburgh Design Guidance.

In conclusion, on the basis of information submitted at this stage, there are no adverse impacts identified, which could not be addressed through the use of appropriate planning conditions, requiring the submission of further information and any relevant mitigation measures, where required.

h) Road Safety Issues

The applicants have stated their commitment to provide a number of changes to local road junctions to improve safety for pedestrians and cyclists. These commitments are included in the applicant's supplement to the Transport Statement.

The provision of a new signalised pedestrian crossing is proposed at the Canning Street arm of the Canning Street/ West Approach Road junction. This work will require the design and refurbishment of the entire junction. The implementation of these works, which the applicant proposes to undertake directly, would be secured through the use of an appropriate planning condition under the relevant AMC application.

The need for footway and pedestrian crossing improvements at the corner of Dewar Place with Torphichen Street, has been recognised in the Transport Statement update. Such improvements would provide greater priority for pedestrians and cyclists. A suitable planning condition will be required to ensure that full details of the above works are submitted for approval under the relevant AMC application.

The applicant has further agreed to make a contribution of £147,000 towards improvements at the Dewar Place and Morrison Street junction, as part of the Council's wider strategy for improving the pedestrian environment in this area of the city. These commitments are included in the supplement to the Transport Statement. This contribution would be secured under a relevant legal agreement.

A condition is also proposed requiring full details of the dimensions, positioning design and materials to be used in the construction of the proposed pedestrian and cycle bridge over the West Approach Road, as well as details of other pedestrian and cycle routes through the development site under the relevant AMC application.

A condition is further included requiring full details for the phasing programme for the implementation of improvements affecting the public footway and highway and related public realm works.

Members of the Edinburgh Access Panel have generally welcomed the changes proposed to the pedestrian access on the road network, including the proposed pedestrian crossing improvements at road junctions.

These proposals would make a significant contribution towards improving the pedestrian and cycle network and securing greater connectivity through this currently relatively isolated part of the city centre. Such measures are in accordance with both the provisions of relevant development plan policy and the principles of the 2010 Masterplan.

The proposed level of vehicle parking provision, which constitutes just 5 spaces for disabled drivers, complies with the Council's parking standards, for this city centre location. Full details of the proposed vehicle parking layout, and details of the location, numbers and design of cycle parking facilities, are required by condition, to ensure that such facilities meet the requirements of the Edinburgh Design Guidance.

i) Biodiversity

A nocturnal survey and a day survey have been undertaken. Evidence of passing bats was recorded but no bat roosts were identified. No further surveys are therefore required.

The proposals comply with LDP policy Env 16 (Species Protection).

j) Archaeology

The site is identified by the City Archaeologist as being located within an area of archaeological significance. A condition is therefore recommended, requiring the undertaking of archaeological works, in accordance with a written scheme of investigation (including excavations, analysis, reporting and implementation), to be submitted by the applicant and approved by the Head of Planning and Transport.

k) Infrastructure requirements

The application site is located in tram contribution zone 1, as identified in the Council's Draft Supplementary Guidance on Developer Contributions and Infrastructure Delivery 2018.

A tram contribution is required, the total contribution of which is £2,519,121 (maximum). This total figure is based on the occupation of the building for the following uses:

Hotel at building 01 (300 bedrooms) accrues a sum of £902,609

Hotel at building 02 (250 bedrooms) accrues a sum of £752,174
Class 3 total - accrues a sum of £531,328
Net Office - $(1,295\text{m}^2 + 3,260\text{m}^2) - 944\text{m}^2 = 3,611\text{m}^2$ equals £333,010
(Existing office use of 944m² is deducted from the sum of the proposed office use.)

This sum would require to be indexed as appropriate and the use period to be 10 years from date of payment.

The proposed values for office and class 1 and 3 uses are based on the uses which would attract the maximum values supplied by the applicant and may be subject to change upon AMC application. Block 2 may alternatively be occupied as offices in place of the hotel; and in this instance appropriate tram contribution based on the current guidance will apply.

(I) Other Environmental Considerations

Railway Issues

Network Rail has advised there should be no additional loading bearing on the rail tunnel, as a result of the proposed works and that all works adjacent to and above the tunnels must be subject to agreement with Network Rail, prior to works commencing on site. Network Rail has further advised that the demolition of any buildings or structures close to the railway infrastructure must be carried out in accordance with a method statement, to be approved by Network Rail, prior to the commencement of work.

Approval of Network Rail will also be required prior to works commencing, for all works involving changes to ground levels, foundations and operational plant in proximity to the railway tunnels. An informative will be required, advising of these requirements and restrictions.

Drainage and Sewage Treatment Issues

Scottish Water (SW) has advised that there is currently insufficient capacity in the Edinburgh Waste Water Treatment works to service this development. The applicant has confirmed that a pre-development enquiry form has been submitted to Scottish Water to allow SW to carry out a full appraisal of the proposals. SW has not issued a full response to date and has advised it will carry out a further review of the availability of capacity within the treatment works once full planning permission has been granted.

The applicant has submitted a surface water management plan and flood risk assessment, in accordance with the Council's agreed self-assessment procedures. The proposals for sustainable urban drainage systems, include the use of permeable paving and underground storage tanks. This information is considered acceptable for the purposes of the planning permission in principle. The use of a condition will require further details of these proposals in relation to the detailed scheme at AMC stage.

The proposed means of discharging surplus surface water is via the combined public sewer. Scottish Water has advised that it does not normally accept surface water connections to the combined sewer, except in limited circumstances at brownfield sites. The applicant has responded to this advice by contacting Scottish Water, to present evidence, supporting their case. It is understood that Scottish Water has not yet issued a formal response on this matter. Further details regarding such arrangements would require to be submitted by means of a condition at the next stage in the application process.

Ground Conditions

A ground conditions survey will be required in order to identify any potential contaminants present at this brownfield site and any remedial measures required to ensure that the site is brought up to a standard suitable for its proposed uses.

Electromagnetic Radiation

The applicant has also confirmed that efficient shielding of the electromagnetic fields associated with the existing substation will be provided, to meet the guidelines of the International Commission on Non Ionising Radiation Protection. The electric and magnetic field levels associated with the type and design of the new substation ensures that EMF levels are well within the International Commission on Non Ionising Radiation Protection Guidelines, not only for occupational exposure but also exposure to members of the public.

(m) Sustainability

The applicant has submitted a sustainability statement in support of the application. As a brownfield site, located within the boundary of the Exchange 2 Masterplan, the site is positioned at a sustainable location.

The proposal has been classed as a major development and has been assessed against Part B of the standards set out in the Edinburgh Design Guidance. The points achieved against the essential criteria are set out in the table below:

Essential Criteria	Available	Achieved
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
Total Points	80	80

This application is for planning permission in principle. Certain details, such as the location low carbon equipment is not marked on the plans but will be identified in the relevant planning application for the approval of matters reserved by condition. Other details such as the position of recycling facilities and the specifications regarding the use of sustainable materials are also unavailable at this stage, but would be expected to come forward at the next stage of the planning application process.

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 use of high efficiency air source heat pumps for room heating and hot water supplies and the use of roof mounted photovoltaic panels.

n) Equalities and Human Rights Issues

An Equalities and Human Rights Assessment has been undertaken in relation to this application, a summary of which is included on the online records for this application.

The main findings in terms of Equalities and Human Rights are:

Impacts on Rights

The proposals to improve pedestrian and cycle access facilities through this area of the city will benefit the community as a whole, by encouraging use of sustainable transport modes, with its related benefits to public health and well-being.

The undertaking of the related building works in close proximity to neighbouring occupiers would have the potential to impact negatively on occupiers' standard of living for a temporary period. However, such impacts would be controlled under separate legislation. The use of conditions, requiring further noise surveys, full ventilation details and suitable mitigation measures at AMC stage, would allow for the control of noise disturbance and other emissions, arising from the proposed uses once operational. This would protect living standards in the longer term.

Impacts on Equalities

The proposals would improve accessibility through the area for the general public. However, as noted by the Edinburgh Access Panel, the provisions for access for disabled people to the pedestrian and cycle footbridge are not as convenient, or clearly positioned as the proposed stairway for use by the general public. This limitation may in turn reduce the benefits to health and wellbeing, in comparison with those potentially delivered to the community as a whole, through the proposals.

A schedule to include hours of operation for the proposed dedicated DDA compliant lift, is proposed for inclusion in the relevant legal agreement, to ensure that such facilities are made available at all reasonable hours, thereby maximising the benefits of accessibility for all. These provisions are considered acceptable given the site's constraints and overall improvements to accessibility in comparison with the existing situation.

o) Representations

Material Representations - Comments in Support

- Improvement of public realm and pedestrian links - this is addressed in paragraph 3.3 (d) and it is found that the proposals would result in such improvement;

- Support for provision of a new footbridge- such provision is supported as addressed in paragraphs 3.3 (d) and (g);
- Integration of the development within the existing urban layout - this is addressed in paragraph 3.3 (d) and it is found that the proposed development form would in general be compatible with the area's character and layout; and
- Suitability of mix of uses - this is addressed in paragraph 3.3 (a) and it is found that the range of uses proposed are acceptable, though greater proportion of office use would be desirable at this location.

Material Representations - Objections

- Potential negative impact on setting of listed building façade - this is addressed in paragraph 3.3 (b) and it is found that the proposed restoration scheme would enhance the area's character but there may be some negative impacts in terms of the proposed large scale extension;
- Concerns regarding extent of demolitions proposed to listed building this is addressed in paragraph 3.3 (b) and it is found that these demolitions are relatively minor in scale and would not adversely affect the remaining building;
- Potential negative impact on character of West End Conservation Area - this is addressed in paragraph 3.3 (e) and it is found that the proposals would have some positive impacts in terms of the facade retention scheme;
- Impact on amenity including natural light and privacy - this is addressed in paragraph 3.3 (g) and it is found that the proposals comply with relevant Council guidance in this respect;
- Inadequate information to assess impact of height and massing on surroundings - this is addressed in paragraph 3.3 (c) and the form and massing of the top floor level has been reserved for consideration at AMC stage, by planning condition, to allow for further consideration of such impacts;
- Insufficient detail on how public realm and access benefits the wider area - this is addressed in paragraph 3.3 (d) and it is found that the proposed footbridge will help facilitate such access provision as well as proposals for upgrading the pedestrian environment at road junctions;
- Insufficient proposals to strengthen existing pedestrian linkages - this is addressed in paragraph 3.3 (d) and it is found that the proposals will help strengthen such linkages;
- Concerns regarding potential disturbance due to noise and vibration arising from proposed uses - this is addressed in paragraph 3.3 (g) and a condition is included, requiring details of measures to reduce disturbance;
- Concerns about the safety of proposed site access from Dewar Place - this is addressed in paragraph 3.3 (h) and the layout shown on the revised scheme, is found to be acceptable in principle; and
- Concerns regarding potential lack of open space and provision of greenery - this is addressed in paragraph 3.3 (d) and a condition is included requiring that such details at AMC stage.

Material Comments

- Need for set back of new build at south west corner of listed building - this is addressed in paragraph 3.3 and it is found that the increased set back provided in final scheme results in an improved relationship;

- Greater opportunities encouraged, to strengthen linkages to Exchange Tower and improve public routes - this is addressed in paragraph 3.3 (d) and it is found that such opportunities are desirable but cannot be delivered under this application;
- Full drainage information required, including SUDS details - this is addressed in paragraph 3.3 (l) and a relevant condition is included; and
- Need for condition for kitchen ventilation - this is addressed in paragraph 3.3 (h) and a relevant condition is included.

Non material issues

- Issues regarding impacts of development at construction phase - these matters are outwith the planning function and will be addressed under separate legislation;
- Concerns regarding impact of proposals on structural integrity of neighbouring buildings - this matter is outwith the planning function and would be addressed under separate legislation;
- Request for proposals, including use of conditions, during construction and demolition stage, to mitigate impacts on neighbouring occupiers - these matters are outwith the planning function and would be controlled under separate legislation; and
- Need for condition to restrict of access and waste collection servicing times - this is a matter which cannot be controlled through the planning function.

West End Community Council

Material comments in Support

- Supports reduction in height and massing and impact on views - this is addressed in paragraph 3.3 (c) and it is found that such impacts are improved;
- Supports improved relationship with listed building in amended scheme - this is addressed in paragraph 3.3 (b) and this improvement is recognised; and
- Supports revised alterations to listed building facade, including entrance details- this is addressed in paragraph 3.3 (b) and this improvement is recognised.

Materials Comments of Objection

- Detrimental impact in views - this is addressed in paragraph 3.3 (c) and it is found that the final proposals are acceptable in this respect;
- Impacts of massing at ground level on public realm and landscaping design - this is addressed in paragraph 3.3 (d) and an appropriate condition is included, requiring such details at AMC stage; and
- Concerns regarding building heights and need for tight control at AMC stage - this is addressed in paragraph 3.3 (c) and appropriate condition are included.

Conclusion

The proposed development would allow for the regeneration of this currently underutilised and constrained city centre site.

The range of uses proposed conforms to the general provisions of LDP policy Del 2 (City Centre) and the principles of the Exchange 2 Masterplan. The proposals would have the potential to deliver a significant contribution towards the area's physical and economic regeneration. However, in order to address the relatively low proportion of floor space allocated specifically for office use, a condition is included, requiring that the details for the allocation of uses at building 02 are reserved for approval.

The proposed scale and massing of the development is considered generally acceptable. However, concerns remain regarding the impact of the proposed building profile at top storey level on the surrounding townscape. A condition is included requiring further details of this element of the proposals, to allow for a more detailed assessment, under the provisions of LDP policy Env 4 (c).

The proposed facade restoration scheme would enhance the retained part of this listed building, in accordance with the relevant provisions of LDP policy Env 4 (Listed Buildings - Alterations and Extensions). These proposals would also accord with the opportunities for the re-use and retention of existing listed buildings, as highlighted in the West End Conservation Area Character Appraisal.

The provisions of a section 75 legal agreement would be required to secure the delivery of the proposed footbridge, the contributions towards junction improvements on Dewar Place and Morrison Street and the road traffic order required to implement the proposed footway works and the provision of a lift at site 01, to ensure suitable accessibility by disabled persons to the proposed footbridge. Contributions will also be required through the legal agreement, towards the Edinburgh tram network, in accordance with the Council's guidance on Developer Contributions and Infrastructure Delivery.

It is recommended that the Committee approves this application, subject to the above mentioned conditions and requirements of an appropriate legal agreement.

It is recommended that this application be Minded to Grant - Legal Agreement

3.4 Conditions/reasons/informatives

Conditions:-

1. Prior to the submission of any application for approval of matters reserved by conditions a phasing plan identifying individual sub-sites and phasing for the proposed works, shall be submitted to and approved in writing by the Planning Authority. Any subsequent alterations to this plan will require to be approved by the Planning Authority. Hereafter, reference to sub-sites in subsequent conditions relates to the identified sub-sites within this phasing plan.

The phasing plan shall include the following items and the timing of their delivery:

- The development phasing and building/s included within each phase;
- Public realm and SUDS;
- Pedestrian, cycle and vehicular access provision, including new and improved routes, including:

- i) All public realm works at ground and podium level and all pedestrian and cycle routes including the route from Dewar Place to Canning Street, and pedestrian and bridge link over the West Approach Road, as indicated on drawing no. 30b.
 - ii) The proposed public stairway leading to podium level from the south end of the building at site 01, at the location indicated on drawing 30b.
 - iii) The installation of footway improvements at the Dewar Place /Torphichen Street junction, including a footway crossing, in accordance with the provisions of condition 2.
 - iv) The installation of a new vehicular access, from the West Approach Road, situated to the north east of the proposed buildings at site 02, as indicated on drawing no. 26c.
 - v) The installation of pedestrian crossing facilities on Canning Street, at the Canning Street / West Approach Road signalised junction in accordance with the provisions of condition 2.
 - vi) The widening of the public footway on the east side of Dewar Place, in accordance with details required for approval under the terms of condition no. 2. The delivery of works will then be carried out in accordance with the approved phasing plan.
2. Before any work on a sub-site is commenced, details of the undernoted matters shall be submitted to and approved in writing by the Planning Authority in a single package of information for the relevant sub-site/s, in accordance with the approved plans for this planning permission in principle; the submission shall be in the form of the finalised layout of the proposed buildings and associated works, as referred to in condition 1 of this consent, including;

Approval of matters:

- a) Details of the proposed land uses at the site of building 02;
- b) Details of the top floor massing and floor plates of buildings 01 and 02;
- c) Design and external appearance of all buildings, including external features and other structures;
- d) Detailed plans and setting out of all roads, footways, cycle routes, multi-use surfaces servicing, including amendments to existing road or footway layouts, in accordance with the approved PPP plans;
- e) In the AMC application for building 01 or 02, whichever is submitted sooner, the detailed design of the public realm at street and podium levels, as indicated in CEC drawing reference 30b, including;
 - i) A scheme for improvements to the public footway and pedestrian crossing at the corner of Dewar Place and Torphichen Street, to allow for a link with the proposed pedestrian and cycle route from Dewar Place to Torphichen Street and maintain provision for pedestrian access to the Exchange Tower office car park;
 - ii) The proposed pedestrian and cycle route from the corner of Dewar Place and Torphichen Street to Canning Street;

iii) The proposed public access route from Dewar Place to Conference Square, including, the walkways and public space at podium level and the bridge link over the West Approach Road, including details of the siting, dimensions, height, design and materials of the proposed bridge link.

f) In the AMC application for the sub-site including building 01, a revised scheme for the widening of the public footway on the east side of Dewar Place, to meet the requirements of the Edinburgh Street Design Guidance and the Council, as Roads Authority;

g) In the AMC submission for the sub-site containing building 02 or 03, whichever is sooner, a scheme for the design and installation of a signalised pedestrian crossing at the Canning Street arm of the Canning Street / West Approach Road junction;

h) In the AMC submission for the sub-site containing building 01 or 02, whichever is sooner, full details of the design and layout of the proposed new vehicular access from the West Approach Road;

i) In the AMC submission for the sub-site including building 01, full details of the location, dimensions and design of a publicly accessible lift and public stairway, providing access to the podium level from the ground floor level of building 01;

j) In the AMC submission for the sub-site including building 01, full details of the proposed vertical circulation facility to podium level at the north end of this building, as indicated on CEC drawing reference 30b;

k) Amendments of any other treatments to adopted roads and footways;

l) Details of the siting and layout of vehicle parking provision for disabled drivers;

m) Details of the location and siting of all cycle parking facilities, in accordance with the provisions of the Edinburgh Design Guidance,

n) Full details of the proposals for surface water drainage including sustainable urban drainage systems; and confirmation that either Scottish Water has agreed to allow any surplus water run-off to be discharged to the public sewer or that alternative arrangements have been made for the treatment of surplus run-off;

o) Details of all external plant, machinery and ventilation;

p) Waste management and recycling facilities;

q) Details and specifications for hard and soft landscaping including:

(i) The type and location of all proposed plant species;

(ii) A schedule of all plants to comprise species, plant size and proposed number and density;

(iii) A programme of completion and subsequent maintenance, including a separate landscape maintenance plan for the SUDS areas where relevant;

- iv) Existing and proposed services, such as cables, pipelines and any substations; or other artefacts and structures, including street furniture, lighting columns and lighting fittings;
 - (iv) Landscape management plan including schedule for implementation and maintenance of planting scheme;
 - (v) All forms of boundary treatment.
3. Construction details and specifications, including trade names where appropriate, of all proposed external materials, shall be submitted to and approved by the Planning Authority, before development works are commenced above ground on any sub-site, identified within the approved phasing plan, (note: sample panels of the materials are to be erected and maintained on a site for an agreed period during construction, to allow for inspection by the Planning Authority at a time to be agreed in advance).
 4. No part of the building at site 01 or 02 shall be occupied until the public realm works, including the proposed bridge link (as included in drawing no. 30b) have been completed, in accordance with the details approved under the provisions of condition number 2 above, unless otherwise agreed through the phasing plan for approval under condition no. 1.
 5. The minimum distance between buildings 01 and 02 shall be 5.3 metres at podium level, as shown on CEC drawing reference 30b.
 6. The minimum width of the pedestrian route from the south side of the building at site 01 on Dewar Place, to the podium shall be 3.5 metres at all points, including from the staircase as indicated on drawing number 30b.
 7. No development shall commence on any sub-site until the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation submitted by the applicant (including excavation, analysis and reporting and interpretation), which has been submitted to and approved in writing by the Planning Authority, having first been agreed by the City Archaeologist.
 8. Prior to the commencement of construction works on each building, or buildings on any sub-site, no works shall commence until:
 - (a) A site survey (including initial desk study as a minimum) is carried out to establish either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
 - (b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.

Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided for the approval of the Planning Authority.

9. Under the AMC application for any building/s included within an identified sub-site sufficient details shall be submitted, to demonstrate that any kitchen ventilation equipment required at the hotel and /or class 3 use establishments located within this sub-site, is capable of meeting the following criteria for the approval of the Planning Authority:
 - (i) The kitchen shall be ventilated by a system capable of achieving 30 air changes per hour, and cooking effluvia shall be ducted to roof level to ensure that no cooking odours escape or are exhausted into any neighbouring premises.
 - (ii) The ventilation system being designed and installed so that gases are expelled with a minimum upwards velocity of 15 metres per second.

10. Detailed noise assessments shall be submitted in relation to each sub-site identified in the phasing plan, as part of the full package of information required under condition number 2 to demonstrate:
 - a) The noise and vibration impacts on the proposed development from road traffic noise on Western Approach Road, the existing SPEN substation and noise associated with the Network Rail underground line and ventilation shaft;
 - b) The noise and vibration impacts from the proposed development (hotel and restaurant use) from operational noise, on the proposed development and existing neighbouring sensitive receptors.The above assessments shall include appropriate mitigation measures and these implementation measures shall be implemented prior to the occupation of the buildings to which they relate.

11. The AMC application for any sub-site containing building 01 shall include:
 - i) A 1:20 drawing, providing full details of the stone coursing treatment and jointing treatment, at the locations where sections of the façade of the listed building at 2 Dewar Place are taken down to allow for the alterations associated with the proposed new entrances and doorways.
 - ii) Full details of the proposed replacement and re-instated windows to be installed within the retained façade, including dimensions, materials and design of framework and glazing details and sectional drawings, demonstrating form of profile.

Reasons:-

1. In order to enable the planning authority to consider this/these matter/s in detail.
2. In order to enable the planning authority to consider this/these matter/s in detail.
3. In order to enable the planning authority to consider this/these matter/s in detail.
4. To ensure that a satisfactory standard of public realm and access provision is delivered on site.
5. In order to clarify the provisions of this planning consent and to ensure that a suitable standard of access provision is available.

6. In order to clarify the provisions of this planning consent and to ensure that a suitable standard of access provision is available.
7. In order to safeguard the interests of archaeological heritage.
8. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
9. In order to safeguard neighbouring amenity.
10. In order to safeguard the amenity of neighbouring occupiers and those within the application site.
11. To safeguard the character and appearance of the remaining listed building and the contribution it makes to the area's character.

Informatives

It should be noted that:

1. a) Application for the approval of matters specified in conditions shall be made before the expiration of 3 years from the date of the grant of planning permission in principle, unless an earlier application for such approval has been refused or an appeal against such refusal has been dismissed, in which case application for the approval of all outstanding matters specified in conditions must be made within 6 months of the date of such refusal or dismissal.

b) The approved development shall be commenced not later than the expiration of 3 years from the date of grant of planning permission in principle or 2 years from the final approval of matters specified in conditions, whichever is later.
2. 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.
3. As soon as practicable upon the completion of each phase 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.
4. This consent is for planning permission only. Work must not begin until other necessary consents, eg listed building consent, have been obtained.
5. The applicant should be aware that listed building consent will be required for the proposed extensions to the listed building at 2 to 3 Dewar Place, which come forward under any of the relevant applications for Approval of Reserved Matters.
6. Consent shall not be issued until a suitable legal agreement has been concluded in relation to the following matters:

i) A contribution of £2,519,121 (maximum) towards the Edinburgh tram network. The total sum will be dependent on the combination of the approved uses taken forward under at each phase of the Approval of Reserved Matters process.

ii) A contribution of £147,000 for the upgrading of pedestrian crossings at Dewar Place/Morrison Street/ Gardners Crescent;

iii) The installation of a lift, or other appropriate form of DDA compliant vertical access facility, providing access to the podium level at building 01, in compliance with the requirements of condition number 3 of this consent, together with a schedule detailing the agreed hours of operation of the proposed lift and the contingency plans for when the lift is out of operation. The respective lift or other appropriate access facility to be installed prior to the occupation of any part of the building at site 01 and maintained in operational use thereafter for use by the public.

The legal agreement should be concluded within 6 months of the date of this notice. If not concluded within that 6 month period, a report will be put to committee with a likely recommendation that the application be refused.

7. Advice from CEC Environmental Protection

All proposed energy plant must comply with the Clean Air Act; details of required chimneys should be submitted at the detailed planning stage. Plant above 1Mw may require secondary abatement technology. Biomass is not appropriate for this site.

The emissions from the emergency generator within the existing electricity substation shall be assessed in accordance with the Clean Air Act.

Construction Mitigation

- a) 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.
- b) 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 is adequate for the prevailing conditions. The assessment shall be recorded as part of documented site management procedures.
- c) 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.
- d) 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.

- e) All vehicles operating within the site on un-surfaced roads shall not exceed 15mph to minimise the re-suspension of dust.
 - f) 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.
 - g) 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.
 - h) No bonfires shall be permitted
8. Advice from Council as Roads Authority
1. 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 Council if they wish 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 2016 regulations or British Standard 8300:2009 as approved.
 2. Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future; Charging outlet (wall or ground mounted) shall be of the following standard with the specifications and locations provided at the detailed stage:
70 or 50kW (100 Amp) DC with 43kW (63 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.
 3. All roads including footways should be designed and built in accordance with standards set out in Designing Street Guidance and Edinburgh Street Design Guidance.
4. The proposed bridge will require structural approval from the Council as Roads Authority.
9. Network Rail Advisory Note
- The developer should contact Network Rail Asset Protection Engineers regarding the following matters:
- There must be no additional loading/surcharge on Haymarket Tunnels (including sidewalls) by the proposed development. All proposed works adjacent to and above the tunnels must be subject to further discussions and agreement with Network Rail prior to works commencing on site.

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 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 Haymarket 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.

Financial impact

4.1 The financial impact has been assessed as follows:

The application is subject to a legal agreement for developer contributions.

Risk, Policy, compliance and governance impact

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

Equalities impact

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

7.1 The sustainability impact has been assessed as follows:

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

Consultation and engagement

8.1 Pre-Application Process

A notice of a proposed application was submitted on 12 April 2016 for a mixed use development including office, hotel, retail, food and drink uses, educational use, flats and student accommodation, as well as deck construction and access from Dewar Place, Canning Street and West Approach Road (reference 16/01929/PAN).

Copies of the notice were issued to the West End and Tollcross Community Councils, Ward Councillors and the City Centre and South West Neighbourhood Partnerships. Full details can be found in the Pre-Application Consultation report, which sets out the findings from the community consultation. This is available to view on the Planning and Building Standards Online services.

A pre-application report on the proposals was reported to the Development Management Sub Committee on 25 May 2016. The Committee noted the key issues at that stage and the additional issues to be included in the forthcoming planning application, including clarification on height of development, connectivity with surrounding area, including Conference Square, Exchange Crescent and the wider area.

The proposals were submitted to the Edinburgh Urban Design Panel on 25 May 2016. Full details of the response can be found in the Consultations section (appendix 1).

8.2 Publicity summary of representations and Community Council comments

The application was advertised on 6 June 2017.

A total of six representations were received. These included two representations in support of the application, one from Scottish Enterprise and the other from a neighbouring business occupier, two letters of objection, both from neighbouring business occupiers and two letters of comment from neighbouring business occupiers.

The application was further advertised on 18 August 2017 following the receipt of revised plans and further supporting information.

A total of five letters of objection were received, three of which are from neighbouring occupiers and two of which are from neighbouring business occupiers. Two late letters of support were received, one of which was from a neighbouring business occupier.

Neighbouring occupiers at flats 1 to 8, 8 Dewar Place were re-notified in respect of the submitted daylight study relating to windows of this building on 29 November 2017. No responses were received in relation to this notification.

Background reading/external references

- 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**

Within the adopted Edinburgh Local Development Plan (LDP) the site is located in the City Centre.

The application site is within the area included in the Exchange 2 Masterplan for Dewar Place (the principles of which were approved by Planning Committee on 25 February 2010).

The site is mainly located within the West End Conservation Area, with a small area to the north east being located in the New Town Conservation Area.

Date registered

24 May 2017

Drawing numbers/Scheme

01a- 03a, 04c-11c, 14b- 21b, 22- 24, 26c, 27,28a,29a, 30b,31,

Scheme 4

David R. Leslie
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Carla Parkes, Senior Planning Officer
E-mail:carla.parkes@edinburgh.gov.uk Tel:0131 529 3925

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy Del 2 (City Centre) sets criteria for assessing development in the city centre.

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

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.

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.

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

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

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

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

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

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

LDP Policy Emp 1 (Office Development) identifies locations and circumstances in which office development will be permitted.

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

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

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

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.

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

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

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.

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

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

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

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.

LDP Policy Ret 1 (Town Centres First Policy) sets criteria for retail and other town centre uses following a town centre first sequential approach.

LDP Policy Ret 2 (City Centre Retail Core) sets criteria for assessing retail development in or on the edge of the City Centre Retail Core.

LDP Policy Ret 7 (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.

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.

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.

LDP Policy Tra 8 (Provision of Transport Infrastructure) sets out requirements for assessment and mitigation of transport impacts of new development.

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) identifies the circumstances in which developer contributions will be required.

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.

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 - 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.

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 'MOVEMENT AND DEVELOPMENT' establish design criteria for road and parking layouts.

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.

The West End Conservation Area Character Appraisal emphasises that the area is characterised by mixed, residential commercial buildings. The central section of the conservation area is a major modern financial area consisting of modern offices. The Georgian and Victorian tenements within the area are mainly 4-6 storeys, and constructed of stone with pitched, slated roofs.

Appendix 1

Application for Planning Permission in Principle 17/02227/PPP

At 2 Dewar Place, Edinburgh, EH3 8ED

PPP for hotel(s) (Class 7), office (Class 4), retail (Class 1), restaurant(s) (Class 3), pedestrian deck, bridge link + accesses from Western Approach Road, Dewar Place + Canning Street; detailed approval for siting, maximum height & limits of deviation of proposed buildings, partial demolition,+ refurbishment of façade of former electricity station (as amended).

Consultations

Transport - response dated 13/02/2018

No objections to the application subject to the following being included as conditions or informatives as appropriate:

1. *The applicant will be required to:*
 - a. *Contribute the sum of £147,000 to upgrade pedestrian facilities on all arms of the Dewar Place/Morrison Street/Gardiners Crescent junction;*
 - b. *Design and install pedestrian facilities on Canning Street at the Canning Street/West Approach Road traffic signalised junction. The applicant should note that this may require the design and refurbishment of the entire junction at no cost to the Council;*
 - c. *Contribute the sum of £2,000 to progress a suitable order to redetermine sections of footway and carriageway as necessary for the development;*
 - d. *Design and install footway improvements at the Dewar Place/Torphichen Street including footway crossing to maintain access to the Exchange Tower office car park and linking with the proposed pedestrian and cycle route through the north of the site all at no cost to the Council. The location of the design is agreed in principle but the detail design will be subject to further approval of the Council;*
 - e. *Contribute the net sum of £2,519,121 (based on proposed 550 hotel rooms, 3,611m² net office, and 3,355m² Class 3 use in Zone 1) to the Edinburgh Tram in line with the approved Tram Line Developer Contributions report. The sum to be indexed as appropriate and the use period to be 10 years from date of payment (see Note b);*
 - f. *The proposed pedestrian/cycle routes and associated accesses within the development site and proposed 5m wide bridge over the West Approach Road to be designed and build at no cost to the Council. The footbridge will require structural approval;*
 - g. *The applicant will be required to carry out works to widen the existing footway at the east side of Dewar. Full details of design and widening of the footway to be a reserved matter;*

2. The approval of the proposed access off West Approach Road is subject to detailed design to the satisfaction of the Council and should be without any adverse impact on either the existing West Approach Road or the proposed pedestrian and cycle route within the development.
3. The proposed lay-by for taxi drop off on Dewar Place is not approved at this stage. This will be subject to further discussion with the Council and taxi operators and will require a contribution of £2,000 to progress the necessary traffic order;
4. Access to the lobby lift is expected to be maintained at all times to allow for disabled access to the footbridge within operational requirements;
5. The location, design, layout and number of cycle parking to be a reserved matter;
6. 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 Council 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 but this does not require to be included in any legal agreement. All disabled persons parking places must comply with Traffic Signs Regulations and General Directions 2016 regulations or British Standard 8300:2009 as approved
7. Electric vehicle charging outlets should be considered for this development including dedicated parking spaces with charging facilities and ducting and infrastructure to allow electric vehicles to be readily accommodated in the future;
8. All roads including footways should be designed and built in accordance with standards set out in Designing Street Guidance and Edinburgh Street Design Guidance.
9. The proposed access on Dewar Place of the proposed shared use route for walking and cycling from the northwest of the development to Canning Street is limited to 1.8m wide; with the existing wall to the north and the facade to the south being barrier for widening. Cyclist would have to dismount for safety reasons. The applicant proposes at least a minimum of 2 wide delineation of safe walking route at shared servicing area to provide safe pedestrian route during operational hours and is considered acceptable.
10. Vertical travel between the podium, Dewar Place and shared use link is proposed by stepped access for both pedestrians and cyclists (via cycle ramps alongside the staircases). A fully accessible route is being provided by a lift from the podium to the hotel lobby and is considered acceptable.
11. The information supplied by the applicant indicates that the gradient of the proposed footbridge is DDA compliant and provides for inclusive mobility.

Note:

a. The applicant proposes 5 disabled parking only and is considered acceptable based on the Council's 2009 parking standards for Zone 1 as shown below;

Type of Development	Zone	Parking requirement
Hotel	1	Assessed on merit Up to maximum of 1 space per 5 bedrooms
Office	1	min 0 max 500

The area is highly accessible by public transport. It also complies with the Council's 2017 parking standards for Zone 1 which permits zero parking for both hotel, office and class 1 +3 use, and up to a maximum of 110 and 9 parking spaces for hotel and office respectively.

b. In terms of tram contribution, the site is treated as a new site as the substation will still be running after the development is built; hence only the existing office use that is to be demolished affects tram contribution for the proposed use.

Hotel - 300 units equals £902,609

Hotel - 250 units equals £752,174

Class 3 total - 1,725+1,135+495= 3,355 equals £531,328

Net Office - (1,295m²+3,260m²) -944m² = 3,611 equals £333,010

Existing office use 944m² is deducted from the sum of the proposed office use.

The proposed GFA values for office and class 3 use are based on maximum values supplied by the applicant and may be subject to change upon AMC application. Block 2 may be alternatively used for office and mix use; and in this instance appropriate tram contribution based on the current guidance will apply.

c. Payment of tram contribution prior to commencement of works.

d. Proposed footbridge, Canning Street signalled crossing, Torphichen Street/Dewar Place uncontrolled crossing and pedestrian routes construction to be carried out by the applicant prior to first occupation.

e. The proposed pedestrian crossing at Canning Street would require an 'all stop' for traffic and will reduce the capacity of the junction. The proximity of the proposed access to the existing West Approach Road /Canning Street junction and potential queue build up on the nearside lane leading to the junction means longer waiting times for vehicles waiting to exit from the proposed access.

Police Scotland

We would welcome the opportunity for one of our Police Architectural Liaison Officers to meet with the architect to discuss Secured by Design principles and crime prevention through environmental design in relation to this development.

Archaeology

Further to your consultation request I would like to make the following comments and recommendations concerning this application for planning permission in principal for two hotels (class 7), office (class 1), Restaurant(s) (class 3), pedestrian deck, bridge link+ accesses from Western Approach Road & Canning Street, detailed approval for siting, maximum heights, limits of deviation of proposed buildings, partial demolition and refurbishment of façade of former electricity station.

The site is occupied by the former late Victorian (1898) municipal electrical station for Edinburgh. This regionally important industrial heritage site (surviving façade and office buildings are both B-listed) lies adjacent to the western limits of Edinburgh's UNESCO World Heritage site and overlying the line of the 1840's mainline railway tunnels between Haymarket & Waverley.

A detailed historic background to the site is contained within in Chapter 9 of the application's Environmental Statement undertaken by GUARD. In summary, the earliest evidence for occupation/use of the site lies in the 12th century when it formed part of the King's Garden. It is recorded as Orchard Field in the 14th century and is likely to have remained open agricultural land until the 18th century when the area was gradually subsumed by the expansion of Edinburgh.

Accordingly, this site has been identified as occurring within an area of archaeological significance. This application must be considered therefore under terms the Historic Environment Scotland Policy Statement (HESPS) 2016, Scottish Planning Policy (SPP), PAN 02/2011 and Edinburgh Local Development Plan (2016) Policies ENV2, ENV 4 and 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.

Listed Electrical Station Buildings

The development will impact upon the surviving B-listed façade and Office block for the Victorian Central Electrical Lighting Station. Firstly, it is welcomed that the proposals seek to retain and incorporate the façade of this important electrical station.

In terms of the former Offices, the proposals will have a significant adverse impact on this B-listed building, seeing the demolition of the building's interior and a section of its western façade. The archaeological impact has been slightly offset by the detailed archaeological survey undertaken by AOC in December 2008 (AOC report 20350) and by the retention of the façade. That said, however the proposed new buildings set behind this façade off the office building have a detrimental impact which could be improved by redesigning the SW corner by drawing back the elevations away from the 'turret'.

Buried Archaeology

Although the site has been affected by modern development, most noticeably the construction of the Electrical works. I agree with GUARD's conclusions that although low the development of this site has a the potential to disturb significant remains relating to the development of site form the medieval period in particular 18-19th century industrial remains. It is recommended therefore that a suitable programme of archaeological work is undertaken during development to fully record, excavate analysis and report upon any significant archaeological remains that may be disturbed by ground breaking works.

Accordingly, it is recommended that the following condition be attached consent, if granted, to ensure that this programme of archaeological works is undertaken either prior to or during construction.

'No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis & reporting, interpretation) 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.

CEC City Archaeologist - comments 13 November 2017

Further to your consultation request regarding these new revised plans (Revision 2) submitted in November regarding these linked LBC and PPP application for planning permission in principal for two hotels (class 7), office (class 1). Restaurant(s) (class 3), pedestrian deck, bridge link and accesses from Western Approach Road & Canning Street, detailed approval for siting, maximum heights, limits of deviation of proposed buildings, partial demolition and refurbishment of façade of former electricity station.

As stated in my original comments, this site has been identified as occurring within an area of archaeological significance. This application must be considered therefore under terms the Historic Environment Scotland Policy Statement (HESPS) 2016, Scottish Planning Policy (SPP), PAN 02-2011 and Edinburgh Local Development Plan (2016) Policies ENV2, ENV 4 and 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.

Listed Electrical Station Buildings

As stated previously, the development will impact upon the surviving B-listed façade and Office block for the Victorian Central Electrical Lighting Station. Having looked over the revised plans I can confirm that the new proposals address my earlier concerns over the impact on the façade and corner copula tower by offsetting and drawing back these important elevations or features.

Accordingly, I have no significant concerns regarding this application. However as stated in June, that although low, the development of this site has the potential to disturb significant remains relating to the development of site form the medieval period but 18-19th century industrial remains.

It is essential therefore that a suitable programme of archaeological work is undertaken during development to fully record, excavate analysis and report upon any significant archaeological remains that may be disturbed by ground breaking works.

It is therefore recommended that the following condition be attached consent, if granted, to ensure that this programme of archaeological works is undertaken either prior to or during construction.

'No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (excavation, analysis and reporting, interpretation) 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.

Historic Environment Scotland - response 5/5/17

Thank you for your consultation which we received on 05 June (PPP) and 06 June (CON & LBC). We have considered the proposals and its accompanying Environmental Statement (ES) in our role as a consultee under the terms of the above regulations. Our remit is world heritage sites, scheduled monuments and their setting, category A-listed buildings and their setting, demolition within conservation areas, gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

Our Advice

Whilst Historic Environment Scotland does not object to the proposals, we have concerns in regard to the potential negative impact the development may affect to the Outstanding Universal Value (OUV) of Edinburgh World Heritage Site. We have suggested ways in which the detailed design could be taken forward in the attached annex. 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 decision not to object should not be taken as our support for the proposals. You should also seek advice from your archaeology and conservation service for relevant matters.

Further Information

This response applies to the application currently proposed. An amended scheme may require another consultation with us. We recognise that we have been consulted in regard to OUV by way of the submission of the Planning in Principle, we would request as a matter of course that we are re-consulted in regard to OUV as the planning process proceeds. Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.engineshed.org.

ANNEX

PPP for two hotels (Class 7), office (Class 4), retail (Class 1), restaurant(s) (Class 3), pedestrian deck, bridge link + accesses from Western Approach Road + Canning Street; detailed approval for siting, maximum height + limits of deviation of proposed buildings, partial demolition + refurbishment of façade of former electricity station at 2 Dewar Place, Edinburgh, 17/02227/PPP

We currently have concerns in regard to the potential negative impact the development may affect to the Outstanding Universal Value (OUV) of Edinburgh World Heritage Site. Following the Planning Committee ratifying the general principles of Exchange 2 Masterplan in 2010, there was a clear understanding that a full visual impact assessment would be undertaken. This was re-iterated when the Masterplan was re-packaged, and re-presented, at the Edinburgh Urban Design Panel on 25 May 2016. The minutes from this meeting are clear, the Panel noting that the height of the buildings on the site will be critical, with the height and mass of the development upon both short and distant views requiring careful assessment as part of the design of the development. Furthermore the Panel noted that the height of the EICC and Canning Street Tower should not inform the heights of the development. Therefore with the above taken into full account, it is particularly disappointing that the submitted

Townscape and Visual Impact Assessment in our view does not currently adequately identify or assess the key attributes of the World Heritage Site which may be affected by this development. In particular the views from Walker Street over Atholl Crescent will be important.

We would ask that that the applicant prepares detailed material specifically addressing key OUV concerns, in particular how the scale, massing, and height will address key skyline and city-scape views in and out of the World Heritage Site. Whilst compiling this additional material, it may be helpful for the applicant's consultants to refer to our guidance document on World Heritage Sites.

We recognise that we have been consulted in regard to OUV by way of the submission of the Planning in Principle, we would request as a matter of course that we are re-consulted in regard to OUV as the planning process proceeds.

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011

Our comments on the ES focus on our historic environment interests in the planning process. This covers scheduled monuments and their settings, category A listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields, and World Heritage Sites.

For the sake of clarity, this does not include the potential direct and setting impacts on the category B listed building known as 2 Dewar Place, Scottish Power Offices, Formerly Central Electricity Lighting Station Including Boundary Walls, Gates and Gatepiers. Whilst we have a role in commenting on the impacts on these buildings, this falls under a separate consultation on listed building consent and comments on this matter can be found under the relevant heading. The focus of our comments on the ES is on the methodology of the assessment and the adequacy of the information provided. Our assessment of impacts, where relevant, is contained in the relevant sections of this letter.

We note that there are two category A listed buildings in the vicinity of the proposed development are content that there will not be a significant impact on their setting.

Scope of assessment

We note the scope of assessment as identified for impacts on our interests.

The ES identifies a 100m buffer from the development boundary for assessment impacts on the setting of cultural heritage assets (9.4.1). We note that no justification for this has been provided, and consider that there is the potential for a development such as this to have significant impacts beyond this radius.

Associated with this, Table 9.1 states that the New Town Gardens Inventory Designed Landscape has not been assessed, as it lies more than 100m from the development boundary. However, we note that the Townscape and Visual Impact Assessment identifies impacts on views from two locations within the designed landscape. However, viewpoint 15, showing the view from Walker Street towards the development, has helped to inform our assessment of the impacts on the GDL. Whilst there will be some impact on its setting, we are content that this will not be significant for our interests.

Methodology

We note the methodology for the assessment of direct impacts on our interests. However, it is lacking in detail for the assessment of impacts on setting is and it is not always clear how the conclusions of the assessment have been drawn.

Supporting information

We note that a number of heritage assets are also considered in the assessment of Townscape and Visual Impact. There are a number of visualisations that are helpful to a consideration of cultural heritage impacts in this section of the ES. It would have been helpful, therefore, for the cultural heritage chapter to cross-reference these where relevant.

There are a number of references in the text to cultural heritage plates. We have not been able to find these amongst the submitted information on the council's planning portal.

Assessment of Old and New Towns of Edinburgh World Heritage Site

We welcome the undertaking in the ES to assess the impacts on the Outstanding Universal Value (OUV) of the World Heritage Site. However, the assessment itself does not refer specifically to the OUV of this particular World Heritage Site, using, instead, the generic selection criteria (9.7.15; 9.7.16). The specific value and attributes of the Site are therefore not used as the baseline for assessment. This means that there is the potential for impacts not to have been fully assessed.

It is notable that the assessment makes no reference to the relevant visualisations from the Townscape and Visual section of the ES. In particular, Appendix 6.3, which includes a study of the views from the new town, aided our assessment of the impacts. It is unclear how a full assessment could be made with no reference to specific views which are impacted by the proposals, or consideration of their contribution to OUV.

The assessment of impacts on the Site (9.7.14-9.7.17) does not give a conclusion on the level of impact prior to mitigation. We note that the mitigation proposed (by design) is considered to render the impact not significant, but no value for magnitude or significance of impact is assigned.

Mitigation

The only mitigation of impacts on our interests that has been identified in the ES is mitigation by design. We would note that the application is for planning permission in principle. The detailed design elements of the proposal are therefore not covered by this application. We have provided comments on how the detailed design could be taken forward in a way which could reduce the impact on the historic environment towards the end of this letter.

Complete Demolition in a Conservation Area

17/02229/CON

Whilst we have no objection to redeveloping the site which is currently occupied by redundant Scottish Power electrical transformers, we would identify that due to its industrial townscape interest consideration is given to recording prior to demolition.

In the mid-1990s, this part of Edinburgh's West End underwent significant re-development. Prominent within this area was this substantial Scottish Power substation which at the time performed a major role in distributing electricity to central Edinburgh and could not be relocated.

Scottish Power's response was to employ designers to explore how the visual quality of the plant could be improved. Simple interventions of landscape and colour transformed the machinery by day, and by night light celebrated it. It has become a well-known landmark within the local area, particularly visible when travelling along the West Approach Road by car.

For further information please contact our Threatened Buildings Survey Team on 0131 662 1456 or tbs@hes.scot .

Demolition of Rear Part of Original Electricity Generating Station, Partial Demolition, Refurbishment and Integration of Retained Façade into Proposed Hotel Building.

17/022228/LBC

C-listed Heritage Asset

Designed in an Italian palazzo style, the (former) Central Electricity Lighting Station built in 1894 is a significant surviving example of Edinburgh's 19th century industrial past.

Since its inception the site has continually evolved and changed, firstly being downgraded to sub-station status with the arrival of the National Grid. The 1990s saw the highly-coloured and sculptural open sub-station located to the east side of the 1990s. More recently the open-substation has become redundant, with a new facility located behind the retained envelope of the former electricity station. A previous consent removed the workshops to the north.

Context and Background

In assessing this application, it is relevant to briefly identify previous discussions regarding the site. In 2009/10 all relevant stakeholders were made aware of proposals coming forward for the redevelopment of this site in its entirety, this was known as the Exchange 2 Masterplan. Historic Environment Scotland, then Historic Scotland, was represented.

We are aware that the Exchange 2 Master plan which was presented to the Edinburgh Planning Committee on 25 February 2010, the committee agreed to approve the general principles contained therein. Therefore, it is within this already established framework we offer the following comments regarding the physical changes proposed to the remaining listed elements.

Re-use of Listed Building

We welcome the retention of the external envelope facing Dewar Place and its return to the highly visible junction at Morrison Street. Whilst we are aware that in essence what is proposed is a façade retention, retaining the building's envelope to both these highly visible and prominent elevations, should in our view, ensure a degree of integrity to the building's special form and character. We would suggest care is taken to retain the 3D nature of the structure, including a rebuild of its roof form.

We welcome the aspiration to reactivate Dewar Place, particularly re-using the existing openings to re-animate and re-energise the street.

Heritage Impact and Way Forward

We would ask that further consideration is given to retaining the elevation in its entirety rather, than as proposed, to demolish the 3-bay office section and insert an access-core for the hotel. Losing this element of the building, with its skilfully composed ground-floor design, would in our view be a retrograde step, both in terms of the detrimental impact it would have to the appearance and character of this elevation, and

in terms of signalling a significant departure from the 'spirit' of the 2010 Masterplan. It would also lose an element of integrity to the whole structure.

We hope that the applicant will be amenable to exploring other ways to intuitively work with the building, rather than as currently proposed compromise this cohesive elevation.

As with our comments above in seeking to maintain a degree of integrity for the building, particularly as the scheme effectively proposes façade retention, we welcome that the historic elevation appears to be meaningfully tied into the floor plates of the newbuild, this should create an interesting dialogue between the old and the new.

Where, however, we would ask for further significant revision, is in regard to the relationship between the set-piece corner Bartizan tower, and how the new development relates and responds to it. Currently the new development due to its proximity, and sheer scale, overwhelms this important landmark/townscape feature. We would therefore encourage further consideration to giving the tower a better defined breathing space, effectively pulling the newbuild away from it, thus allowing it to retain its architectural significance. As above, a retention of the original roof-form to the corner building would assist this process.

If helpful we would welcome further input regarding the specific comments we have made about the works to the listed building.

Historic Environment Scotland - further comment - on revised proposals

As stated in our letter dated 30 June 2017, we do not object to the proposals. Our comments on the updated proposals and assessment are given in an annex to this covering letter. For clarity, we have separated this into three sections, covering our comments on the EIA, the planning permission, and the listed building consent respectively.

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. However, 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.

Annex

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011

We note the submission of supplementary statements for the cultural heritage and townscape and visual impact assessments of the Environmental Statement (ES). Our comments on the additional information are focussed on the issues raised in our previous response of 30 June 2017.

For clarity, as no alteration has been made to the scope of the assessment or the methodology, we have no further comments on these issues. The focus of these comments is the additional information submitted in support of the assessment of impacts on the Old and New Towns of Edinburgh World Heritage Site (WHS).

We welcome the submission of comparative visualisations showing the amendments made to the previously submitted scheme. These were very informative in our assessment of impacts, and it was helpful that they were directly referred to in the cultural heritage assessment. We also welcome the submission of the cultural heritage plates which we were unable to locate in the ES previously.

One of the key issues raised in relation to the ES in our previous response was that impacts on the WHS had not been assessed fully against the Statement of Outstanding Universal Value (OUV) for the Site. We are content that this has now been undertaken, and consider the detail provided on this in the Townscape and Visual Impact Assessment (TVIA) to be very helpful, and clearly explained.

It is slightly unclear how the distinction between issues to be covered in the TVIA and in the cultural heritage assessment has been made. For example, we would ordinarily consider all of the key attributes of the WHS to be cultural, as it is inscribed as a cultural Site. However, we are content that the level of information provided is adequate, and consider this only a pragmatic issue in terms of organising this information.

Purely for clarity, we noted that paragraph 4.0 of the supplementary statement on cultural heritage states that there will be no significant impact on the WHS, and therefore no impact on its OUV. We assume that this statement should be inverted, as the assessment of the WHS has been undertaken against its OUV. As it is currently written, it implies that the assessment of the WHS informs the conclusions of impacts on OUV.

*Planning Permission
17/02227/PPP*

Old and New Towns of Edinburgh World Heritage Site and setting of Category A listed buildings

Although the proposed development would be viewed from many locations in the vicinity and further afield, our main concerns relate to the visibility of the development behind Atholl Crescent from views down Walker Street, specifically from the intersection with Melville Street. In addition, the submitted photomontage from Rutland Street shows the significant impact it would have on the setting of Rutland Square. Both locations are within the World Heritage Site and concern the setting of Category 'A' listed buildings.

The revised proposals show a reduced bulk, and differentiated treatment behind Atholl Crescent either side of Exchange Tower - formerly Canning House. Atholl Crescent (1825) was designed by Thomas Bonnar as part of the Walker Estate, the crescent form dictated by retained Elm trees. The Walker Estate, designed by Robert Brown, is a planned extension of the New Town and an important component of the World Heritage Site. We welcome these revisions that have reduced the bulk behind the

crescent, but consider the removal of an additional storey from the eastern section of the site (to the left of Exchange Tower) would be beneficial.

New development addressing the West Approach Road is visible in the corners of Rutland Square, again a planned extension to the New Town. Currently these developments do not loom over the three-storey Georgian square (like Exchange Tower). The photomontage shows the new development rising above the square in views down Rutland Street. Any reduction of bulk would be welcome, as would further visualisations from within the square as the impact may be reduced as one enters the Square from Rutland Street.

We note that the development will also be visible from further afield, specifically in views of Edinburgh Castle and its rock from Corstorphine Road. In many of these views the development shows a horizontal uniformity in contrast to the dominant cityscape. Any reduction in this horizontality would be welcomed, either by design changes or reduction of bulk.

In conclusion, whilst we do not consider the impact on the OUV of the World Heritage site, or the setting of A listed buildings, is significant enough to warrant an objection, we do consider reductions in the bulk of the development would be beneficial in assimilating the development within Edinburgh's established townscape.

*Listed Building Consent
17/022228/LBC
Category B-listed building*

As yet, we have not received a consultation on revisions to listed building consent application which would be in line with the alterations to the planning application. As the revisions will alter the impact on the listed building we thought it would be useful to provide advice at this stage.

The revised drawings have addressed some of the concerns we raised in our letter of 30 June. We welcome the intention to retain the three-bay upper floors of the Dewar Place façade, initially proposed for removal. However, the loss of the ornate ground floor is regrettable.

We still have concerns with the treatment of the corner building, specifically designed to address the corner with its bartizan turret. As before, we would suggest that the integrity and authenticity of this corner building would be aided by retaining its current roof form (it could be rebuilt) and setting back the proposed development further behind it. The slate roof of the building and its skew chimneystack can be clearly seen from Morrison Street, as can the return (cornice and parapet) of the previously façade-retained Dewar Place block. We would suggest the scheme is revised to retain more of the 3-D nature of the buildings including divisions between buildings and the returns and masonry elements.

As before, we welcome the aspiration to reactivate Dewar Place, particularly re-using the existing openings to re-animate and re-energise the street. This will help provide a degree of integrity for the listed building.

Historic Environment Scotland- response dated 29 November 2017 on further revisions

Thank you for your consultation which we received on 10 November 2017. We have considered it and its accompanying Environmental Statement Addendum in our role as a consultee under the terms of the above regulations and for our historic environment remit as set out under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013. 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.

This response should be read alongside our previous responses to consultations on this scheme. These include two letters on the planning application and EIA consultation (dated 30 June 2017 and 22 September 2017) and our letter dated 23 November 2017 in response to your consultation on listed building consent application 17/02228/LBC.

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

As stated in our letter dated 30 June 2017, we do not object to the proposals. We note the further amendments to the scheme.

We welcome the inclusion of further visualisations for our interests in the Addendum. This was very helpful in enabling us to see the progression of the design over the course of the application and two amendments.

We are content to agree with the conclusions presented in the Addendum that the level of impacts for our historic environment interests under the EIA regulations (as above) have not been significantly altered. We therefore have no further comments on this. For our comments on the scope and methodology of the assessment, we refer you to our letter of 30 June 2017.

As detailed in our letter of 23 November 2017, we are content that the alterations to the proposals have addressed our main concerns regarding impacts on the category B listed building 2 Dewar Place, Scottish Power Offices, Formerly Central Electricity Lighting Station Including Boundary Walls, Gates and Gatepiers, West End. These impacts do not form part of our interest under the EIA regulations.

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.

However, 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.

CEC Environmental Protection

The proposed application site is located within the city centre of Edinburgh and is predominantly surrounded by commercial and residential land. The site is bounded by Dewar Place to the west and the Western Approach Road to the east. A junction between Dewar Place, Morrison Road and Western Approach Road lies to the south of the site. Edinburgh Conference House is directly south of the site and the Edinburgh International Conference Centre is to the south-east of the site on the other side of Western Approach Road. The site is bounded to the north by commercial premises and

offices with residential areas on Canning Street beyond. The nearest residential area is on the other side of Dewar Place, near the south end of the site.

The Planning Permission in Principal PPP application seeks full planning permission for the siting of two hotels. In the north of the planning boundary, an office space is proposed. Additionally, small-scale retail, cafes and bars/restaurants are proposed for the ground floor of the one of the hotels. At this stage of the development, the layouts and elevation of the buildings within the proposed application have not been specified.

At the site referred to as 01 there is an existing Scottish Power Energy Network (SPEN) substation building, which has been designed to accommodate significant structures on a podium on top of the substation columns. One of the proposed hotels is located at this site, with kitchen, restaurant and plant rooms on the podium level, and bedrooms and conference rooms on the level above this. The next five levels above this would consist of primarily bedrooms, with a plant room included on the top level. In addition, small-scale retail and bar/restaurants are proposed on the ground floor level, facing Dewar Place.

A second hotel is proposed to be located at 'Site 02', across 11 levels, with the largest plant space on the ground floor and top floor, and bedrooms on all levels except ground floor. Reception would be located on same level as the podium on top of the SPEN substation building to the south-west.

The applicant has submitted a noise impact assessment which investigates noise impacts from static plant, machinery or equipment associated with the development when developed. This indicated that, incorporating mitigation measures as required. At the PPP stage, details such as the specification of the layout of plant and equipment are not always available. The applicant has also advised that foundation design and structure specification are not finalised. As such a detailed noise and vibration assessment for noise impacts on receptors in the hotels, offices and small-scale retail and bars/ restaurants has not been undertaken. Further noise assessments will be required once these details are known, to allow potential noise and vibration impacts to be designed out. The most likely significant external sources of noise and vibration have been identified as road traffic noise on Western Approach Road, the existing SPEN substation and noise associated with the Network Rail underground line and ventilation shaft.

It should be noted that Environmental Health enforce construction site noise under the Control of Pollution Act. The applicant is advised that noise from construction should be limited to Monday to Saturday during 07:00-19:00. Environmental Protection recommends that the applicant ensures that construction site progress is communicated to any concerned neighbours. This could be in the form of a website detailing key activities.

The applicant has provided Environmental Protection with written confirmation from advising that there is efficient shielding of the electric magnetic field (EMF). The electric and magnetic field levels associated with the type and design of the new substation ensures that EMF levels are well within the International Commission on Non Ionising Radiation Protection Guidelines, not only for occupational exposure but also exposure to members of the public.

Local Air Quality

Environmental Protection requested that emissions from the extracts from the substation be assessed. The applicant has confirmed that these extracts are used solely for cooling and ventilation air, and do not serve any combustion plant, thus they will not represent a source of air pollution. It is not, therefore, necessary to consider them further. However, there will be emissions from the emergency generator within the existing electricity substation. The proposed development will necessitate the moving of the flue that serves this emergency generator, but no detailed design for this has been prepared. The generator is understood to have only been required to operate for a couple of hours since its installation, not including hour-long monthly testing. This flue and its emissions will need to be considered alongside the other energy plant at the detailed planning stage.

The Network Rail tunnel ventilation shaft serving the southern Haymarket tunnel, which sits within the proposed development, will be capped as part of the development works. The vent houses a transformer serving the electrified railway lines below, access to which may occasionally be required, thus the cap to be installed will be removable. However, it is unlikely to be open for more than a few hours a year for maintenance. As such, the vent will not represent a significant source of emissions that might affect future occupants of the proposed development, and warrants no further consideration.

The nature of the proposed development site is such that it has the potential to create new canyon-like features along the length of West Approach Road, which could restrict dispersion of emissions from vehicles leading to elevated concentrations within the street canyon. However, the applicant has indicated the development will be designed with large areas of open space and with buildings distributed through the site so that no significant new canyons are formed. The hotel described as 'Site 02' will create a short canyon-like section, but with open space on either side, thus canyon effects will be very limited. Given that there are no residential or other high-sensitivity receptors opposite this building the risk of significant impacts because of creating this short canyon-like section is minimal.

Environmental Protection encourage the developer to work with this department to produce a Green Travel Plan which should incorporate the following measures to help mitigate traffic related air quality impacts;

- 1. Keep Car Parking levels to minimum.*
- 2. Car Club facilities (electric and/or low emission vehicles).*
- 3. Provision of rapid electric vehicle charging facilities.*
- 4. Provision of rapid electric vehicle charging facilities (Taxis).*
- 5. Public transport incentives for residents.*
- 6. Improved cycle/pedestrian facilities and links.*

Due to the history of this site and the availability of power the applicant is advised to ensure electric vehicle charging is provided throughout. The site is also located near the city centre air quality management area. Environmental Protection shall recommend a condition to ensure charging points are provided.

The applicant will also need to consider land contamination due to the historic use, a condition shall be recommended.

Given that the application is only for PPP, very little detailed design work has been undertaken for the development. The lack of detailed design information has resulted in it not being possible to undertake some elements of the air quality assessment work that would be expected for a detailed planning application. This is common for PPP applications and these matters should be dealt with at the appropriate stage (generally the detailed planning permission stage); all are mitigatable by design therefore the following conditions are recommended:

Class 3 and Class 7

1. Cooking odour ventilation details should be provided at the approval of matters in conditions (AMC) stage. In this regard, details should be provided which confirm that the ventilation will meet the following criteria:

(i) The kitchen shall be ventilated by a system capable of achieving 30 air changes per hour, and cooking effluvia shall be ducted to roof level to ensure that no cooking odours escape or are exhausted into any neighbouring premises.

(ii) The ventilation system being designed and installed so that gases are expelled with a minimum upwards velocity of 15 metres per second.

(iii) The ventilation system shall be installed, tested and operational prior to the use hereby approved being taken up.

Site in general

2. Full details including elevational drawings and technical data on efflux velocity regarding the required relocation of the emergency generator flue shall be submitted to the Planning Authority for its approval at the detailed application stage.

3. During construction, it will be necessary to apply a package of mitigation measures to minimise dust emissions these details shall be submitted at the detailed stage.

4. Charging outlet (wall or ground mounted) shall be of the following standard with specific specifications and locations provided at the detailed stage:

70 or 50kW (100 Amp) DC with 43kW (63 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.

5. Prior to the commencement of construction works on site:

a) A site survey (including intrusive investigation where necessary) must be carried out to establish, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and

b) Where necessary, a detailed schedule of any required remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority.

6. *Detailed noise assessments will be required at the detailed planning stage, to assess noise and vibration impacts on the proposed development from road traffic noise on Western Approach Road, the existing SPEN substation and noise associated with the Network Rail underground line and ventilation shaft. This must identify appropriate mitigation measures.*

7. *Detailed noise assessments will be required at the detailed planning stage, to assess noise and vibration impacts from the proposed development (hotel and restaurant use) from operational noise, on the proposed development and existing neighbouring sensitive receptors. This must identify appropriate mitigation measures.*

Informatives

All proposed energy plant must comply with the Clean Air Act, details of required chimneys should be submitted at the detailed planning stage. Plant above 1Mw may require secondary abatement technology. Biomass is not appropriate for this site.

The emissions from the emergency generator within the existing electricity substation shall be assessed in accordance with the Clean Air Act

Construction Mitigation

a) *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.*

b) *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 is adequate for the prevailing conditions. The assessment shall be recorded as part of documented site management procedures.*

c) *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.*

d) *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.*

e) *All vehicles operating within the site on un-surfaced roads shall not exceed 15mph to minimise the re-suspension of dust.*

f) *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.*

g) *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.*

h) *No bonfires shall be permitted.*

Edinburgh World Heritage - response dated 16/06/2017

Thank you for seeking EWH's input at this early stage in the planning process. Although the proposals are outwith the World Heritage Site, they do sit within the virtual buffer provided by the web of conservation areas and viewing cones.

It would be helpful to understand the potential of the proposals to impact on long views, particularly W01b, W04b and W05b, and seek the mitigation of any potential negative impacts at this early stage.

Edinburgh World Heritage - response dated 01/10/2017

Thank you for consulting EWH on the impact on views into and out of the World Heritage Site of the proposals for Dewar Place. We note that the site, while outwith the World Heritage Site, has the potential to impact of certain views and we are grateful to the development team for providing clear illustration of these.

The proposals, as they currently stand, would form a large block in the urban fabric in long views to the World Heritage Site, particularly from Corstorphine Hill, where the block acts to set a new datum for the Castle, reducing some of the overall impact of the Castle Rock and Castle in the view.

The proposals also present themselves above Atholl Crescent in the views from Walker Street. This is of concern as the skyline in this area is relatively unbroken - long views along streets in the New Town were carefully planned.

Finally, Rutland Square has managed to date to avoid being impacted by the large new developments to the south and west, but these proposals would loom over parts of the square, better resembling the character of the more intensely developed parts of London than Edinburgh's World Heritage Site.

These three points would suggest that the loss of a storey and some breaking up of the massing would greatly reduce the potential to impact on the World Heritage Site.

Scottish Natural Heritage

Thank you for consulting Scottish Natural heritage on the above development proposal. We note the proposed development site is located in the Exchange District, a densely built up urban area adjacent to Edinburgh city centre.

We welcome the proposed new routes for pedestrians and cyclists connecting the proposal with adjoining streets and attractions. These routes, if delivered to suitable standards, will also support the wider strategic network for walking and cycling.

We note the intention to carry out a survey to confirm the presence or absence of bats. We can provide advice on the results of this survey but only if you are uncertain about:

- The adequacy of the survey and any protection plan;*
- Whether a species licence will be needed; or*
- The prospects of a species licence being granted.*

Advice for planners and developers can be found on our website.

Scottish Natural Heritage - EIA Response dated 13/09/2017

Thank you for consulting SNH on the revised proposal and further information submitted in support of the above application. This new information has allowed us to consider the proposal more widely within its landscape and townscape context and we have provided advice below.

Landscape and Visual Impacts

We note the further information that has been submitted, including new montaged visualisations which now illustrate the outline massing and profile of built development which is likely to be seen from wider representative viewpoints. This further information includes visualisations which demonstrate the nature of changes in views experienced from the west towards the city centre and the Castle Rock landform within the Old and New Towns of Edinburgh World Heritage Site.

We highlight that the Corstorphine Road viewpoint (EIA viewpoint 23) shows the juxtaposition of proposed development in proximity to the visible junction between the steep craggy landform of Castle Rock with the lower lying surrounding landscape/townscape. While the visualisations from this viewpoint show that there is a discernible difference in the height of the currently proposed development, when compared to the original submission (and therefore the landscape impact of the revised proposal compared to the original submission is less than the original), we would nonetheless advise that the Council gives careful consideration to the issues presented by this viewpoint as representative of an important approach to the city centre.

More generally in this regard and as seen from other areas of the city, we would advise that care should be taken so as to ensure that the scale, positioning, massing, or future detailed design details (such as external colour or roofscape), does not significantly detract from allowing the wider appreciation of the steeply sided iconic profile of the Castle Rock landform and Edinburgh Castle and the strongly juxtaposed position it has with the lower lying landscape and townscape context.

Public Access and Movement Network

We note further information on this issue and as highlighted in our response to the original development proposal, we broadly welcome the proposed new routes for pedestrians and cyclists connecting the proposal with adjoining streets and attractions. We advise that these routes, if delivered to suitable standards of detailed design, will also support the wider strategic network for walking and cycling.

European protected species

Our previous advice to you regarding potential impacts on bats remains unchanged. Please let me know if any clarification is required.

SEPA

We have no objection to the consulted on planning application and supporting ES. Please note our advice provided below.

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, which may take account of factors not considered at the planning application stage.

Advice for the planning authority

1. Flood Risk

1.1 We have reviewed the information provided in this consultation and it is noted that the application site (or parts thereof) lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of surface water flooding.

1.2 Review of the Flood Risk and Drainage, chapter 13, indicates that mitigation measures will be in place during and after construction to deal with any surface water runoff. Discharges into the combined sewage will be assessed during the detailed design stage and an assessment of the capacity of sewage will be undertaken to ensure that the sewage capacity will be adequate for discharge and upgrades/maintenance will be undertaken to ensure the flood risk will be minimised. We support these statements

1.3 Any drainage or SUDs proposed are for the council to satisfy themselves that the arrangements will be appropriate and in accordance with any internal guidance.

2. Drainage

2.1 Drainage is a material planning consideration as set out in PAN 79 Water and Drainage. Planning authorities have been designated responsible authorities under the Water Environment and Water Services (Designation of Responsible Authorities and Functions) Order 2006. As such authorities are required to carry out their statutory functions in a manner that secures compliance with the objectives of the Water Framework Directive (i) preventing deterioration and (ii) promoting improvements in the water environment in order that all water bodies achieve "good" ecological status by 2015 and there is no further deterioration in status This will require water quality, quantity and morphology (physical form) to be considered.

Foul Drainage

2.2 The applicant is proposing to discharge foul drainage arising from the development to the public drainage network vested by Scottish Water (SW).

2.3 We note that the applicant is dealing directly with SW to confirm that the existing sewerage infrastructure has sufficient capacity to accept the volume of foul drainage arising from this development proposal. We will expect SW to ensure that this connection will not cause or contribute to the operation of existed consented sewer overflows.

Surface Water

2.4 In accordance with the requirements of The Water Environment (Controlled Activities) (Scotland) Regulations 2011, also known as The Controlled Activity Regulations (CAR) surface water runoff arising from the hardstanding areas, inclusive of road and roofs will require to be collected, treated and disposed of using sustainable drainage techniques.

2.5 The applicant has outlined within the application that surface water arising from the development will be discharged into the combined system.

2.6 It should be noted that SW only accepts surface water into a combined system in exceptional circumstances. Removing surface water from the combined sewer is beneficial as it, increases capacity in infrastructure for future development and reduces the risk of pollution events.

2.7 Should the application be altered in the future in that surface water will discharge to the water environment then we will expect to be re-consulted. In that instance the applicant will be required to provide SUDS in line with CIRIA 697. For the avoidance of doubt we would outline that the proposed storage tanks mentioned on table 3.6, in part 13 of the technical appendices, of the ES, is not recognised as appropriate SUDS and therefore this would not be acceptable by SEPA as a required level of treatment should the normal requirements apply.

3. Waste Management

3.1 Consideration should be given prior to construction to any waste material generated from this development. Waste generated on site and any movement of waste off site, including soils, must comply with the Environment Protection Act 1990. A site waste management plan should be submitted as part of the CEMP to address these issues.

4. Air Quality

4.1 The local authority is the responsible authority for local air quality management under the Environment Act 1995. Therefore we recommend that you consult with your environmental health colleagues regarding this element of the proposal.

4.2 They can advise on the submitted Air Quality assessment contained within the ES. They can also advise on potential impacts such as exacerbation of local air pollution, noise and nuisance issues and cumulative impacts of all development in the local area.

5. Contaminated Land

5.1 The Local Authority is the lead authority in relation to contaminated land and we therefore request that you consult your Environmental Services Department and those responsible for implementing the contaminated land regime regarding this proposal. These contaminated land specialists will take a lead on commenting on the planning application, with SEPA's contaminated land specialists providing input directly to them in relation to impacts upon the water environment.

Detailed advice for the applicant

6. Flood Risk Caveats & Additional Information for the applicant

6.1 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² 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.

6.2 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. Please note that this document should be read in conjunction with Policy 41 (Part 2).

6.3 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

6.4 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.

6.5 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 Stirling 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 in line with the phases of this legislation and can be downloaded from www.sepa.org.uk/planning/flood_risk.aspx.

Regulatory advice for the applicant

7. Regulatory requirements

7.1 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website.

Scottish Water

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following: There is currently sufficient capacity in the Glencorse Water Treatment Works to service this development. Please note that further investigations may be required to be carried out once a formal application has been submitted.

- There is currently insufficient capacity in the Edinburgh Waste Water Treatment works to service this development. Please note that further investigations may be required to be carried out once a formal application has been submitted.

Please note: Due to the capacity at the treatment works, to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website at the following link:

www.scottishwater.co.uk/business/connections/connecting-your-property/new-developmentprocess-and-applications-forms/pre-development-application

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Infrastructure within boundary

According to our records, the development proposals may impact on existing Scottish Water assets.

- On review of the application I can see that there is both water and foul Scottish water infrastructure within the boundary of this development.

The applicant should identify any potential conflicts with Scottish Water assets. I can confirm that I have made our Asset Impact Team aware of this proposed development however the applicant will be required to contact them directly at service.relocation@scottishwater.co.uk.

The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not normally accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes: Scottish Water asset plans can be obtained from our appointed asset plan providers: Site Investigation Services (UK) Ltd

Tel: 0333 123 1223 Email: sw@sisplan.co.uk www.sisplan.co.uk

- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.

- If the connection to the public sewer and/or water main requires to be laid through land outwith public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.

Next Steps:

- Single Property/Less than 10 dwellings

For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a Pre-Development Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.

- 10 or more domestic dwellings:

For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution

regulations. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website using the following link.

www.scottishwater.co.uk/business/connections/connecting-your-property/new-developmentprocess-and-applications-forms/pre-development-application

- Non Domestic/Commercial Property:

Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk

- Trade Effluent Discharge from Non Dom Property:

Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.

If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email TEQ@scottishwater.co.uk using the subject 'Is this Trade Effluent'. Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found using the following link

<https://www.scottishwater.co.uk/business/our-services/compliance/tradeeffluent/trade-effluent-documents/trade-effluent-notice-form-h>

Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.

For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.

The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection.

The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com

If the applicant requires any further assistance or information, please contact our Development Operations Central Support Team on 0800 389 0379 or at planningconsultations@scottishwater.co.uk.

Network Rail

Whilst Network Rail has no objections in principle to the proposal, due to its location above Haymarket 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:

There must be no additional loading/surcharge on Haymarket Tunnels (including sidewalls) by the proposed development. All proposed works adjacent to and above the tunnels must be subject to further discussions and agreement with Network Rail prior to works commencing on site.

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 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 Haymarket 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.

West End Community Council - response dated 13/09/2017

Planning Application Ref: 17/02227/PPP 2 Dewar Place

In its capacity as a consultee, the West End Community Council submits the following views with regard to the August 2017 revisions:

1 Height and mass:

In general we are appreciative of the effects of the revisions to height and massing. Reductions in height have lessened the impact as seen from:

Dewar Place and Morrison Street junction. Ref: 16.8m (ii) Viewpoint 2

West Maitland Street and Torphichen Street junction. Ref: 16.8 (vii)

Canning Street and Torphichen Street junction. Ref: 16.8 (i.a) Viewpoint 1

The increased setback at the corner tower on Dewar Place has improved the relationship to the Listed Building. Ref: p41 Supplementary Information

The remaining CC concerns are:

The new build still seems overpowering as viewed from Rutland Street in the WHS.

The view from Walker Street to Atholl Crescent is still affected. The roofline has already been interrupted by the Exchange Tower, but further interruption should attempt to retrieve the setting of the roofline of this A Listed Georgian terrace. The proposed varied hotel roof heights are an improvement, but care must be taken over the materials that are specified. Ref: 16.8 (vii) Viewpoint 15.

There is some concern that increased massing at ground level will harm the public realm provision and landscape design.

2 Options for new entrance to hotel - A single storey hotel entrance is preferred.

The enlarged version, although it interferes with the integrity of the original structure, allows a lining through of the first floor fenestration. It creates a pend effect. The setbacks, e.g. of the stair, are an improvement.

If approval is granted, WECC suggests that there should be tight control of the heights of the hotels at the next stage in the application.

We trust that the above comments will be taken into consideration.

Edinburgh Urban Design Panel comments

Executive Summary

The proposal for review is a masterplan for the proposed Exchange 2 development at Dewar Place, situated to the south west Edinburgh City Centre. The site has been identified for consideration by the Panel due to its prominent city centre location and the complexity of the site. The Panel welcomed the opportunity to review the proposals at this early stage in the design process.

Main Report

1 Introduction

1.1 The proposal for consideration is a site masterplan for the on-going redevelopment of the Scottish Power sub-station site bounded between Dewar Place, the Western Approach Road, Canning Street and Rutland Court Lane.

1.2 The proposed development site, covers an area of 1.55 hectares. The site is currently occupied by an existing electrical substation with vacant land to the north east. The substation would be incorporated in to the proposed development. The retained frontage of the electricity company's former offices lines the site frontage on Dewar Place. It is category 'B' listed (LB reference:- 03/007/B, Date of listing:- 23 March 2001). The northern section of the site is underlain by railway tunnels.

1.3 The site fronts on to the east side of Dewar Place and is flanked to the east by the Western Approach Road. The 5 to 6 storey building at Conference House lies immediately south of the site and fronts on to Morrison Street. The vacant land opposite the site, on the west side of Dewar Place, is subject of a planning application for a hotel development which is currently under consideration (Application reference:- 16/00700/FUL).

1.4 The site lies within the Central Area as identified in the Edinburgh City Local Plan (ECLP) and with the City Centre as identified in the Second Proposed Local Development Plan (LDP). The proposals will need to be considered in terms of their compliance with Policy Ca 1 of the ECLP, and its equivalent policy in the proposed development plan, which amongst other considerations provide for a mix of use appropriate to the location of the site, its accessibility and the character of the surrounding area.

1.5 The boundary of the Old and New Towns of Edinburgh World Heritage Site lies to the north west of the site. The application site is located within the New Town and West End Conservation Areas.

1.6 A Proposal of Application notice (PAN) has been submitted informing of a forthcoming application for a Planning Permission in Principle for a mixed use development including office (Class 4), hotel (Class 7), retail (Class 1), food and beverage (Class 3), education (Class 10), flats and student accommodation and enabling development, including deck construction and access from Dewar Place, Canning Street and the Western Approach Road.

1.7 No declarations of interest were made by any Panel members in relation to this scheme.

1.8 The Panel noted that proposals for the general principles of the Exchange 2 Masterplan for Dewar Place were previously reviewed by the Edinburgh Urban Design Panel in June 2009.

1.9 This report should be read in conjunction with the pre meeting papers which provide illustrative materials of the proposals and site analysis.

1.10 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.

2 Contextual response and Development Concept

2.1 The Panel recognised that the site is transitional in terms of character, forming an interface between the hard landscape of the Exchange Quarter to the east and the West End to the north and west. The Canning Street area and the lanes to the north possess a human scale and finer grain of development which contrast with the immediate surroundings. The Panel considered that the development of this site could start to connect a number of adjacent elements together including the EICC, Atria building, Conference House (Scottish Enterprise) and the Canning Street tower, but no details were provided by the design team to demonstrate how the massing, height transition and response to each of the adjacent areas would be handled. The Panel suggested that a physical model should be prepared to further understand the design implications relating to the proposed height and mass of the development.

2.2 The Panel felt that the surrounding streets and spaces are disconnected and the thrust of the proposal could help open up the area. New links across the site are therefore critical and the Panel welcomed the principle of a new pedestrian link between the development site and Conference Square to the east. However, the Panel also noted the limitations of a Planning Permission in Principle (PPP) application in resolving detailed design issues at this stage.

2.3 The Panel welcomed the retention of the listed facade which could help anchor the identity of the development within the adjacent streets and urban grain.

2.4 The Panel expressed concern about the nature of the existing environment of Conference Square which is north facing and now more greatly enclosed by high buildings. Given the level of overshadowing and absence of active ground floor frontage the Panel queried if it would be realistic to suggest that the character of space could be significantly changed, e.g. through the introduction of street cafes. However,

the Panel considered that the Square is not a presently a lively or happy place and increased footfall from the west could help facilitate activity within the space.

2.5 The Panel commented that the pedestrian connection across the site to Conference

Square could lack legibility and the entrance to this route must appear inviting. The design team stated that a retail unit was being considered to Dewar Place in order enliven this section of frontage and enhance the legibility of this route. The Panel suggested that the treatment of all site edges could further enliven the adjacent routes and integrate the development between the various character zones. The relationship between public and private elements of the development also requires further consideration.

2.6 The Panel enquired whether the constraints of the site almost result in a pre-ordained shape for the development. The design team responded that the substation building was future proofed with a podium deck to create the next phase of development. The Panel commented that seeking to achieve a particular development quantum for the site may not necessarily be the best approach for the site, rather it will be the use type which will be critical. Whilst the Panel noted that the technology used within the substation facility is highly sophisticated, development costs could still increase significantly to deliver certain types of use, e.g. residential. A careful balance must therefore be struck.

2.7 The Panel also noted the site constraints to the eastern corner of the site which contains a ventilation shaft to the railway tunnels beneath and this may limit the level of development which can be achieved in this part of the site.

2.8 The Panel queried whether this site was identified in the Terry Farrell masterplan. The design team confirmed that this was not included however sketches had indicated a curved façade to the block to the south. The Panel stated that it would be useful to understand what was said at the time.

2.9 The Panel remarked that the site area is relatively overshadowed in nature due to presence of surrounding high buildings. Further modelling is therefore required in respect of daylighting levels.

2.10 In summary, the Panel were supportive of the development in principle, recognising the strategic opportunities that the site presents for the city centre, particularly the EICC and Haymarket development to the west. The Panel welcomed the aspiration to improve connectivity across the site.

3 Scale, height and impact on key views

3.1 The Panel remarked that the height of buildings will be critical in this location, with the EICC already representing a large element on the skyline, particularly when viewed from western part of the city. The impact of the height and mass of the development upon both short and distant views must be carefully assessed as part of the design development.

3.2 The Panel stated that the height of the EICC and Canning Street tower should not inform heights of the development.

3.3 *The preparation of a physical model as previously outlined in 2.1, could further assist in understanding the height and scale of the development.*

4 Transport and Accessibility

4.1 *The Panel commented on the poor quality pedestrian environment in the vicinity of the site, including Morrison Street, Dewar Place and the Canning Street area. This situation could be improved with potential developer contributions and Council capital funding. The design team indicated they would be keen to promote a more pedestrian friendly environment particularly at the junction of Dewar Place and Morrison Street.*

4.2 *The Panel stated the proposals should address the requirements of the new Edinburgh Street Design Guidance and seek to avoid a minimal footway particular given the nature of the surrounding streets.*

4.3 *The Panel commented on the pronounced 9 metre level change within the site, this presenting potential issues in terms of accessibility and meeting DDA requirements. The design team stated that they were proposing to use closes to take the pedestrians through the site via steps. However, the Panel recognised that this may present issues in terms of DDA compliance.*

4.4 *The Panel queried how the development would improve facilities for cyclists, particularly cycle access from the west of the site and how the proposals would respond to the existing north - south cycle route in Conference Square.*

4.5 *The design team outlined that the proposed development would include minimal parking provision, this being difficult to implement due to the constraints of the site, but the location is also highly accessible and well served by public transport. This aspect of the proposal was welcomed by the Panel.*

4.6 *The Panel enquired how the Western Approach Road would be handled in relation to the development also noting the difficult traffic conditions which are currently evident in the vicinity of the site. The Panel also noted that the proposed development would be serviced from the Western Approach Road and asked how traffic would egress from this route. The design team outlined that no discussions had taken place on transport issues as part of the current application. However, they recognised issues arising from the presence of the Western Approach Road and potential opportunities to improve the current situation. This could include reducing the current speed limit.*

5 Sustainability and Environmental Considerations

5.1 *The Panel commented on the built-up character of the locality, with limited planting in evidence. This development could provide an opportunity for greening and improving biodiversity, through measures such as green roofs, internal or external atria and planting to the site edges.*

5.2 *The Panel also observed that the site presents other challenges in terms of environmental factors, particularly traffic noise and fumes from the Western Approach Road and overshadowing from adjacent high buildings. These factors will demand a particular design response.*

5.3 The Panel recognised the nature of the site could present opportunities for sustainable design particularly the use of heat recovery from the sub-station, the orientation and size of atria and stairwells, the use of photo-voltaics and advanced technological approaches to lighting and plant. In response to this, the design team stated that an open stair arrangement could facilitate lighting. The Panel also caveated that the use of photovoltaics may also present visual issues, particularly in key views of the site.

5.4 The Panel felt that the design approach should seek to maximise the use of sustainable design and features to improve biodiversity and would strongly encourage BREAMM certification and other environmental criteria be pursued within the development.

6 Security Considerations

6.1 The Panel commented that the sub-station represents a critical piece of national infrastructure and as such a major counter terrorism threat. In view of this, protection measures to mitigate this need to be carefully considered as part of the design development process including access control to the site and effective CCTV coverage. Technology is rapidly advancing in this area and techniques such as facial recognition should be considered.

6.2 The Panel also commented that radio communications for the emergency services are due to move from an airwave system to 4G network from 2020. Whilst this will improve coverage in many areas, the area around this site contains many high buildings. Adequate network coverage must be maintained throughout the site, particularly in areas such as subterranean car parks and in proximity of thick concrete walling.

7 Recommendations

7.1 In developing the design, the Panel supports the following aspects and therefore advocates that these should remain in the proposals:

Recognition of the transitional nature of the site, which forms an interface between areas of contrasting character

Development of a legible pedestrian route through the site to link Dewar Place with Conference Square

A minimal level of vehicle parking within the development

The retention of the listed façade on Dewar Place

Recognising the significance of the Sub Station site as an important piece of national infrastructure

7.2 In developing the proposals the Panel suggests the following matters should be addressed:

Prepare a physical model of the proposals to aid the understanding of issues relating to the scale, height and mass of the development

Consider how the development of a pedestrian route to Conference Square could enliven and facilitate activity both within the site and adjacent spaces

consider the types and balance of uses which could be compatible with the operational requirements of the Sub Station to determine the development quantum

Consider other site constraints which may have a bearing upon the overall levels of development

Issues relating to overshadowing from adjacent buildings and how daylighting levels within the development could be maximised

The height of the proposed buildings and potential impacts upon short and distant views

Seek to enhance the pedestrian environment in the vicinity of the site in conjunction with the development proposals, e.g. junction of Dewar Place and Morrison Street

Consider pedestrian accessibility through the site which provides a suitable response to the pronounced level change, including DDA compliance

The development of cycle facilities, including the relationship to the existing north-south cycle route in Conference Square

Vehicular access arrangements from the Western Approach Road and measures to improve upon the current situation relating to traffic levels

The environmental challenges presented by the Western Approach Road including noise and traffic levels

Sustainable design measures including heat recovery from the Sub Station and measures to improve biodiversity

Use of suitable environmental accreditation for the development, e.g. BREAMM

Design measures and features to enhance the level of security within the development, particularly to acknowledge the significance of the Sub Station as a major piece of national infrastructure

Ensure adequate coverage within the development for emergency communications, including the move to 4G technology in 2020

Economic Development service - response dated 16/06/2017 + Addendum dated 30/08/2017

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.

Commentary on existing use

The application relates to 1.24 hectares of land bounded by the West Approach Road to the east; Morrison Street to the south; Conference House to the southwest; Dewar Place to the west; and the Exchange Tower and Caledonia Exchange on Canning Street to the northwest. The railway tunnels linking Haymarket and Edinburgh Waverley stations run beneath the northern section of the site.

The land in question is currently occupied by a substation complex, comprising a modern podium building along with a yard containing transformers and other equipment, some of it now decommissioned. It is noted that the substation is proposed to remain in place and operational throughout the redevelopment of the site and beyond and so there would be no loss of economic impact associated with the decommissioning of the substation.

Dewar Place was identified in 2012 as one of the Edinburgh 12 - 12 gap sites in central Edinburgh with the greatest potential economic impact. Dewar Place is recognised as occupying a prime location but as presenting substantial practical challenges from a development perspective including the rail tunnels that partly undercut the site; the need to preserve the substation in place; the need to preserve ventilation shafts; the limited frontage; the listed façade onto Dewar Place; and the change in levels across

the site. The site has been the subject of multiple development proposals, most significantly the 2010 "Exchange 2" masterplan prepared by PLP Architecture which proposed a wider redevelopment incorporating Conference House and the vacant land between Torphichen Street and Dewar Place Lane delivering 10,143 sqm of hotel space; 9,945 sqm of office space; 4,645 sqm of residential space; 3,054 sqm of leisure space; and 3,028 sqm of retail space.

Commentary on proposed use/uses

The site in question falls within the city centre as identified by the Local Development Plan (LDP) for Edinburgh. A relevant policy is Del 2A, which states, 'where practicable, major mixed use developments should provide offices, particularly on upper floors.'

Class 1 - Shops/Class 3 - Restaurants and cafés

The development as proposed would deliver 206 sqm (gross) of class 1 (shop) / class 3 (restaurant and café) space. Given average ratios of net to gross space for retail buildings of 90:100, this is calculated to represent approximately 185 sqm (net) of class 1 / class 3 space.

Average employment densities for shops and restaurants and cafés range from one full-time equivalent (FTE) employee per 15 sqm (net) to one FTE employee per 20 sqm (net). This indicates that the shops / restaurants and cafés could be expected to directly support between 9 and 12 FTE jobs if fully occupied, giving a median figure of approximately 11 FTE jobs.

The average gross value added (GVA) per annum for the distribution, transport, accommodation, and food sector in Edinburgh was £24,444 as of 2015. Multiplying this average GVA per employee figure by the median employment estimate would give an estimated annual GVA from the shop / restaurant and café space if fully occupied of £0.27 million per annum (11 x £24,444).

The drawings provided suggest that the retail / food and drink elements of the development would comprise a restaurant fronting onto Dewar Place along with a shop and café fronting onto the new elevated plaza proposed to be created opposite Conference Square. This could be expected to help animate Dewar Place and to help draw footfall into Conference Square via the plaza.

Class 4 - Office

The development as proposed would deliver 4,559 sqm (gross) of class 4 (office) space. Given average ratios of net to gross space for office buildings of 80:100 to 85:100, this is calculated to represent approximately 3,761 sqm (net) of office space.

Average employment densities for office space range from one FTE employee per eight sqm (net) for call centres to one FTE employee per 13 sqm (net) for corporate offices. This indicates that the office space could be expected to directly support between 289 and 470 FTE jobs if fully occupied, giving a median figure of 380 FTE jobs.

The average GVA per annum for the information and communication; financial and insurance activities; real estate activities; and business service activities sectors in Edinburgh (the sectors that primarily account for office demand) was £87,377 as of 2015. Multiplying this average GVA per employee figure by the median employment estimate would give an estimated annual GVA from the office space if fully occupied of £33.20 million per annum (380 × £87,377).

It is noted that the office elements of the development account for 15.1% of the total gross floor-space delivered but 52.7% of the projected employment and 79.9% of the projected GVA. This reflects the relatively high employment density of office buildings and the relatively high average output of the sectors that typically occupy offices.

The drawings provided indicate that the office block would be located in the extreme north of the application site, fronting onto Canning Street. The Planning Statement describes this as 'a landmark building to take advantage of the character of Canning Street/Rutland Square, and to deliver a high quality statement building in this somewhat neglected, yet highly prominent gateway to the site.' The Planning Statement also suggests the block would be divided into small units of 500 sqm aimed primarily at technology companies. The Planning Statement indicates that development of the office block would be contingent upon securing pre-lets for at least 60% of the building.

The proposed quantum of office space within the development is lower than previously mooted which is unfortunate given the highly strategic location of the development within the Exchange District and the increasingly scarce number of sites suitable for office development in the city centre. However, it is recognised that the constraints on the site make the lower risk option of hotel development more attractive from an investment perspective.

Class 7 - Hotels and hostels

The development as proposed would deliver 25,330 sqm (gross) of class 7 (hotels and hostels) space, representing 550 bedrooms across two hotels, one of 300 bedrooms and one of 250 bedrooms.

Average employment densities for hotels range from one FTE employee per five bedrooms in a budget hotel to one FTE employee per bedroom in a luxury hotel. This indicates that the hotels could be expected to directly support between 110 and 550 FTE jobs if fully occupied, giving a median figure of approximately 330 FTE jobs.

The average GVA per annum for the distribution, transport, accommodation, and food sector in Edinburgh was £24,444 as of 2015. Multiplying this average GVA per employee figure by the median employment estimate would give an estimated annual GVA from the hotel space if fully occupied of £8.07 million per annum (330 × £24,444).

It is noted that the Edinburgh International Conference Centre (EICC) has suggested that a lack of large four-star hotels in its immediate vicinity makes it more challenging for it to attract conferences. The creation of 550 hotel bedrooms adjacent to the EICC could address this and help the EICC attract additional conferences.

Sundry

The Design and Access Statement for the proposed development includes a 'future masterplan opportunity' plan showing potential developments outwith the application boundary area. This plan does not include the Conference House office building, which it is anticipated is likely to come forward as a development opportunity in future. Given the increasingly limited development opportunities in this part of Edinburgh, it is considered crucial that the redevelopment potential of Conference House be safeguarded. The land immediately north of Conference House is currently used as a service yard; this land could at present support a future redevelopment and expansion of Conference House. It is therefore suggested that the development as proposed should not preclude the future redevelopment and expansion of Conference House.

The bridge over the West Approach Road linking the elevated plaza with Conference Square would significantly enhance permeability through the Exchange District. It is noted that proposals have made previously for a more extensive deck over the West Approach Road. While it is recognised that this is outwith the scope of the current proposals, it is suggested that the development as proposed should not preclude the future creation of a deck.

SUMMARY RESPONSE TO CONSULTATION

The development as proposed would if fully occupied, deliver a projected direct employment impact of 721 FTE jobs (11 + 380 + 330) and a direct GVA impact of £41.54 million per annum (£0.27 million + £33.20 million + £8.07 million). These are gross figures that do not consider multipliers, displacement, etc. The office elements of the development account for 53% of the jobs and 80% of the economic output. There is therefore a considerable impact on the economic impact of the development if the office block does not proceed.

It is suggested that safeguards be put in place to ensure that the proposed development does not preclude either a redevelopment and expansion of Conference House or the formation of a deck over the West Approach Road.

This response is made on behalf of the Economic Development service.

ADDENDUM - 30 AUGUST 2017

I Additional information was provided by the applicant in August 2017 in response to issues raised by various consultees. This information has been reviewed and the following information added.

Economic impact

The applicant has provided a socio-economic impact assessment of the development produced by Colliers. The assessment states that both hotels would be four-star, with 550 bedrooms supporting approximately 330 full-time equivalent (FTE) jobs. The Employment Density Guide (3rd edition) published by the UK Homes and Communities Agency states that 'upscale' hotels support on average 1 FTE job per 2 bedrooms (giving an expected total of 275 FTE jobs), while 'luxury' hotels support on average 1 FTE job per bedroom (giving an expected total of 550 FTE jobs). The projection of 330 FTE jobs therefore appears reasonable. This figure is equal to the original estimate provided by the Economic Development service.

The socio-economic impact assessment suggested that the 330 direct jobs will support a further 790 jobs in the wider economy via indirect and induced impacts (multiplier effects) and the impact of visitor expenditure, giving a total of 1,120 jobs. The assessment also suggests that the hotels will support an increase in the gross domestic product of Edinburgh of £28.6 million annually. These estimates are tested below.

Data from the Scottish Government Input-Output tables suggests that every job in the accommodation sector supports a further 0.3 jobs in the wider economy via multiplier effects (a combination of indirect effects - the impact of supply chain expenditure - and induced effects - the impact of employee expenditure). This suggests that the 330 jobs would support a further 84 jobs in the wider economy. Data from the same dataset suggests that every pound of GVA in the accommodation sector supports a further 0.4 pounds of GVA in the wider economy. Based on the estimated GVA figure for the hotels of £8.07 million quoted above, this suggests that multiplier effects would support a further £3.36 million of GVA per annum.

The hotels could be expected, assuming all bedrooms were available year-round by a single occupant and an indicative occupancy rate of 80%, to support a total of 160,710 bed-nights in Edinburgh throughout the year ($550 \times 365.25 \times 80\%$). This figure would rise if the proportion of bedrooms shared by guests or the occupancy rate was to rise.

Data from VisitScotland indicates that visitor expenditure in Edinburgh averaged approximately £108 per bed-night in 2015. This suggests that the 160,710 bed-nights would translate to approximately £17.36 million of expenditure in the local economy by visitors per annum. It could be argued that visitors staying in four-star hotels could be assumed to have more disposable wealth than the average visitor and that they would therefore likely spend higher-than-average sums in the local economy. However, this must be offset against the argument that visitors who are spending significant sums on occupation may opt to spend less on other aspects of their trip than those visitors staying in low-cost accommodation.

Data from the Edinburgh Visitor Survey indicates that accommodation accounts for approximately 37% of daily expenditure by overnight visitors to Edinburgh, while eating/drinking accounts for 29% shopping for 17%; entertainment for 11%; and travel/transport for 6%. This suggests that expenditure by visitors on items other than accommodation will total £10.93 million: £5.03 million on eating/drinking; £2.95 million on shopping; £1.91 million on entertainment; and £1.04 million on travel/transport.

Based on average turnover per employee and gross value added per employee in the relevant sectors as quoted in the Scottish Annual Business Statistics, it is estimated that this £10.93 million of expenditure would support a total of 151 jobs and £4.58 million of GVA per annum (2015 prices) (92 jobs and £2.96 million of GVA in the food and beverage service sector; 27 jobs and £0.81 million of GVA in the retail sector; 24 jobs and £0.27 million of GVA in the arts, entertainment and recreation sector; and 9 jobs and £0.53 million of GVA in the transport and storage sector).

Overall, it is estimated that the hotels could be expected to support an overall total of 565 jobs (330 direct jobs + 84 indirect and induced jobs + 151 jobs supported by visitor expenditure) and £16.01 million of GVA per annum (£8.07 million direct GVA + £3.36 million indirect and induced GVA + £4.58 million of GVA supported by visitor

expenditure). This is considerably lower than the 1,120 jobs and £28.6 million per annum of gross domestic product quoted in the socio-economic impact report. It is therefore suggested that the figures quoted in the socio-economic impact report somewhat overstate the likely impact of the hotels.

Additionally, it is noted that the office space is estimated to, if fully occupied, support an increase in the GVA of Edinburgh of £33.20 million per annum (2015 prices). This figure is substantially higher than the applicant's estimate of the economic impact of the hotels, despite the relatively low proportion of the site allocated to office uses. This emphasises the large contribution to the overall economic impact of the development made by the office components. This is due to the high employment density of office uses and the relatively high value nature of the sectors that typically occupy offices.

Conference House

It was previously suggested that safeguards be put in place to ensure that the proposed development did not preclude a redevelopment and/or an expansion of Conference House. The public realm diagram provided by the applicant suggests that the land immediately north of Conference House will be used as a service yard. It is anticipated that this could be addressed in the detailed designs.

Deck

It was previously suggested that safeguards be put in place to ensure that the proposed development did not preclude the formation of a deck over the West Approach Road. It is anticipated that this could be addressed in the detailed designs.

SUMMARY OF ADDENDUM

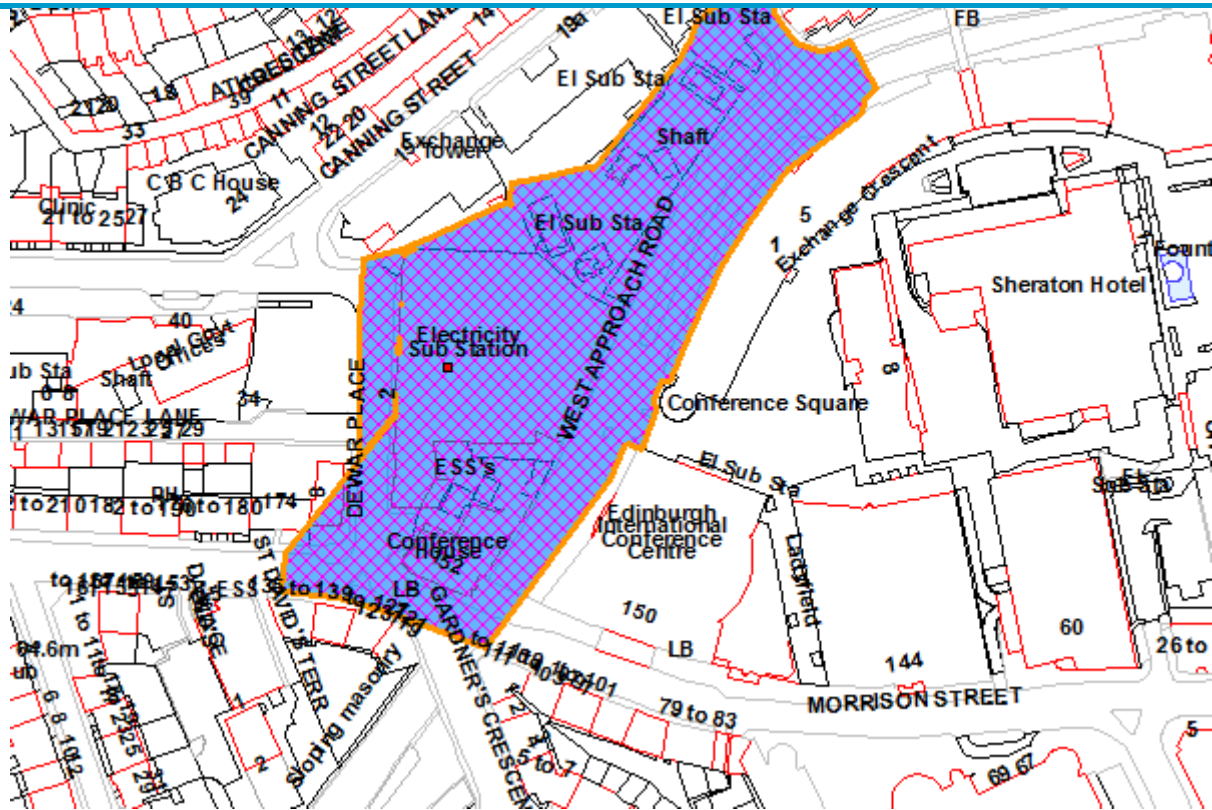
It is reiterated that the office elements of the development account for most of the projected directly-supported jobs and a large majority of the projected direct economic impact, and that there is therefore a considerable impact on the economic impact of the development if the office block does not proceed.

It was previously suggested that safeguards be put in place to ensure that the proposed development did not preclude a redevelopment and/or an expansion of Conference House, or the formation of a deck over the West Approach Road. The development as proposed does not appear to preclude either of these aspirations. It is anticipated that these matters could be addressed if detailed designs are submitted.

Economic Development - response dated 23/11/2017

The points made in the August addendum to our original response are re-iterated. In terms of the EIA, the addendum looks at the 'SOCIO-ECONOMIC IMPACT' statement from Colliers submitted in August 2017. This has slightly different figures in it to the socioeconomic impact chapter of the EIA; as it was submitted at a later date. It is assumed that the new figures supersede the old ones. Colliers' submission suggested the jobs/GVA impact of the hotels was potentially overstated.

Location Plan



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