Development Management Sub Committee

Wednesday 20 June 2018

Application for Planning Permission 17/05832/FUL At National Galleries Of Scotland, 1 The Mound, Edinburgh Alterations and extension to the 1978 Property Services Agency (PSA) wing with adjoining interior alterations to the Scottish National Gallery (SNG) and the 2004 Weston Link, new and improved service and pedestrian access, landscaping, public realm and other works to achieve improved connections between galleries, gardens and the city beyond.

Item number 7.3 (a)

Report number

Wards B11 - City Centre

Summary

The proposal is acceptable in principle and represents sustainable development as defined by the Edinburgh Local Development Plan (LDP).

The proposal is acceptable with respect to layout, scale and design and it will not have an adverse impact on the character and appearance of the site or the New Town or Old Town Conservation Areas. The proposals will not have any adverse impact on the setting of listed buildings and will not impact on the Outstanding Universal Value of the World Heritage Site. The proposed public realm alterations are an enhancement to East Princes Street Gardens. The proposal complies with relevant policies in the Development Plan and associated non-statutory guidance.

The proposal is acceptable. There are no material considerations which outweigh this conclusion.

Links

Policies and guidance for this application

LDPP, LDEL02, LDES01, LDES03, LDES04, LDES05, LDES07, LDES08, LDES12, LEN01, LEN03, LEN04, LEN06, LEN07, LEN08, LEN09, LEN11, LEN12, LEN16, LRET07, LTRA07, NSG, NSLBCA, NSGD02, NSGSTR, NSADSP, NSART, OTH, CRPNEW, CRPOLD, CRPWHS,

Report

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Recommendations

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

Background

2.1 Site description

The application site is the National Gallery of Scotland and forms part of a gallery complex that includes the Royal Scottish Academy, the Mound Precinct and part of East Princes Street Gardens. The site is located in a prominent, elevated position on the west side of East Princes Street Gardens.

The National Gallery complex consists of two internationally significant buildings by the architect William Playfair, the Royal Scottish Academy (1822-6) and the National Gallery (1850-59). Both buildings were designed in the Greek Revival style.

The proposals primarily concern the National Gallery of Scotland, originally designed in 1850, but with internal alterations by WT Oldrieve in 1910-12, and later with a basement-level extension by the Property Services Agency (PSA) in 1975-8. The two galleries were linked in 2004 by John Millar & Ptrs in the Playfair Project (later Weston Link), and provide a garden-level entrance to East Princes Street Gardens.

Both the National Gallery of Scotland and the Royal Scottish Academy are category A listed, (Item No 27679 and Item No 27744) and were listed on the 14 December 1970.

The John Wilson Monument lies to the northern part of the site within Princes Street Gardens and is a statue to Professor John Wilson, The statue was designed by Sir John Steell, 1863-5, and is listed category A, (Item No 27881), listed 14 December 1970. The memorial to the International Brigade in the Spanish Civil War (1936-39) lies adjacent to a path below the PSA extension. The stone is a simple monolith with a brass plaque attached, and is not listed.

Together with the buildings, the complex is situated within the Old and New Towns of Edinburgh World Heritage Site and within a registered Garden and Designed Landscape (New Town Gardens).

To the east of the site lies East Princes Street Gardens. The Mound lies to the south and west of the site. Princes Street lies to the north. A railway tunnel runs directly under the National Gallery of Scotland.

The boundary between the Old Town and New Town Conservation Areas cuts through the site.

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

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2.2 Site History

The Scottish National Gallery and Royal Scottish Academy have an extensive planning history.

The following applications are most relevant to the current application:

Applications (01/04617/FUL/LBC) for planning permission and for listed building consent were for the resubmission of previous applications (application reference 99/03914/GDT and 01/00488/GDT) owing to the transfer of ownership of the National Galleries of Scotland and the Royal Scottish Academy from the Scottish Ministers to the Trustees of the National Galleries of Scotland. The transfer to the Trustees removed the Crown exemption of the properties and the applications were resubmitted in the name of the trustees to formalise the required planning and listed building consents.

18.04.2002 - Planning Permission granted to restore, part convert + improve environmental controls of RSA. Linking the National Gallery + RSA beneath the mound + provision of education + visitor facilities. General environmental improvements to Mound + vicinity (partly in retrospect) (application reference 01/04617/FUL).

10.05.2002 - Listed building consent granted to restore, part convert + improve environmental controls of RSA. The linking National Gallery + RSA beneath the mound + provision of education + visitor facilities. General environmental improvements to Mound + vicinity (partly in retrospect) (application reference 01/04617/LBC).

06.09.2016 - Demolish the 1978 PSA plinth extension elevation and completely remodel the associated existing interior. (as amended) (application reference 15/05791/LBC).

13.09.2016 - Planning Permission granted to extend and re-model the current Scottish Collection Gallery in the plinth of the Scottish National Gallery (as amended) (application reference 15/05795/FUL).

Concurrent application for listed building consent:

April 2018 - concurrent application for listed building consent under consideration for alterations and extension to the 1978 Property Services Agency (PSA) wing with adjoining interior alterations to the Scottish National Gallery (SNG) and the 2004 Weston Link, new and improved service and pedestrian access, landscaping, public realm and other works to achieve improved connections between galleries, gardens and the city beyond (application reference 17/05842/LBC).

Main report

3.1 Description Of The Proposal

The proposals primarily concern works to three areas within the complex - the Scottish National Gallery (SNG), the 1978 Property Services Agency (PSA) wing and the more recent Weston Link, built in 2004.

The current applications present a reduced scope of works to the recently consented applications for the galleries complex. Applications for planning permission (15/05795/FUL) and listed building consent (15/05791/LBC) were granted in September 2016. Following development of the design and review of the consented scheme, specific elements of the proposal have been revised. The main changes are as follows:

- The omission of the gallery extension of the PSA wing into Princes Street Gardens; and
- The retention of the north stair connecting the Western Link to the Scottish National Gallery above.

The existing glass and bronze facade of the PSA wing will be removed as part of the works. This will be replaced with a new facade comprising a palette of honey-coloured stone. Full height slot windows positioned at regular intervals along the facade will relate to a suite of rooms within the gallery. This glass and stone wall would be articulated by a large picture window at the point where it joins to the Gardens Entrance facade. The main entrance within the Weston link extension would be altered to form a new entrance.

The scheme also proposes new and improved service and pedestrian access, landscaping, public realm and other works to achieve a showcase for Scottish Art and improved connections between galleries and gardens. The new works to the interior of the galleries are assessed in the concurrent application for listed building consent (17/00587/LBC).

The Spanish War Memorial will be retained in situ in its existing position close to the PSA wing within the Gardens.

The landscape design can be broken down into 4 component areas which work together to achieve the above:

- a new public space at Princes Street/Mound level;
- an improved connection between Princes Street and the Weston Link entrance;
- a new terrace in front of the Weston Link elevation; and

 a new footpath connection between the Weston Link and the foot of the Playfair Steps.

Supporting Statements

The following documents have been submitted in support of the application.

- Design and Access Statement (Statements 1-7), including a Heritage Impact Assessment:
- Townscape Visual Impact Assessment (Appendix A);
- Tree Survey (Appendix B);
- Bat Survey (Appendix C);

A letter of support has also been submitted from the Director General of the National Galleries of Scotland.

These documents are available to view on the Planning and Building Standards Online Services.

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 development is acceptable;
- b) the proposed development will have an adverse impact on the Outstanding Universal Value (OUV) of the World Heritage Site;

- c) the proposals affect the setting of the listed buildings;
- d) the proposals preserve and enhance the character or appearance of the conservation area;
- e) the proposed design and materials are acceptable;
- the proposed development will have an adverse impact on the landscape character of the site;
- g) the proposed development will have an adverse impact on views;
- h) the proposed impact on hard and soft landscaping;
- i) there will be a detrimental impact on trees and biodiversity;
- j) the development would impact on Open Space provision;
- k) there will be any impacts on archaeological remains;
- I) the proposals meet the Council's requirements in respect of sustainability;
- m) representations raise issues to be addressed; and
- n) the proposals have any equalities or human rights aspects that need to be considered.

a) Principle

The continued use of the site for promotion of arts, recreation, education purposes and cultural activities is consistent with the principles relating to the delivery of infrastructure and promoting access to the cultural environment.

The proposed alterations and new landscaping works will provide the visitor, cultural and educational facilities expected of a modern international gallery. Through this scheme the proposals will provide a sequence of new galleries to house the extensive Scottish Collection. The improved delivery access and environmental conditions within the gallery spaces will allow the buildings to meet modern requirements. This will allow the Galleries to show larger and more international exhibitions. The proposed lifts and linkage will provide access to all parts of the building complex, for both visitors and staff with disabilities.

The proposed alterations to the galleries also complies, in general terms, with sustainable development principles relating to accessibility, owing to the site's city centre location, where public transport facilities are readily available. The continued use of the existing building also contributes to the sustainable nature of the development.

The proposals will introduce a high quality design and landscaping proposals, which will promote place making. The continued use of the galleries as a major cultural attraction would contribute to the economic growth of the city. The proposals are considered to be consistent with these principles.

The accessible City Centre location complies with the principles of LDP Ret 7, in relation to the preferred location of entertainment, leisure and arts facilities in the city centre. The gallery proposals would make a valuable contribution towards the City's cultural and visitor facility as encouraged by policy Ret 7.

The alterations to the gallery within this city centre location accords with the provisions of LDP policy Del 2 and Ret 7, which provides for the location of such arts and leisure facilities within this City Centre location, subject to compliance with other development plan policies.

b) Impact on the World Heritage Site

There is one relevant Outstanding Universal Value (OUV) of the Old and New Towns of the Edinburgh World Heritage Site that corresponds to this application. The first paragraph of the Statement of Outstanding Universal Value in the Edinburgh World Heritage Site Management Plan states that:

"the juxtaposition of these two distinctive townscapes distinctive townscapes (the Old and New Towns), each of exceptional historic and architectural interest, which are linked across the landscape divide, the great arena of Sir Walter Scott's Waverley Valley, by the urban viaduct, North Bridge, and by the Mound, creates the outstanding urban landscape"

The Management Plan further states:

"The New Town... is framed and articulated by an uncommonly high concentration of planned ensembles of ashlar-faced, world-class, neo- classical buildings, associated with renowned architects, including John and Robert Adam, Sir William Chambers, and William Playfair. Contained and integrated with the townscape are gardens, designed to take full advantage of the topography, while forming an extensive system of private and public open spaces. The New Town is integrated with large green spaces. It covers a very large area, is consistent to an unrivalled degree, and survives virtually intact"

Although the Management Plan does not refer to specific buildings, it is clear that the pair of Playfair buildings on the Mound are two of the most important buildings in Edinburgh, and therefore contribute significantly to the Outstanding Universal Values of the World Heritage Site. The proposed development reinforces the significance of the building as an art gallery. The creation of the new Scottish Gallery ensures that part of the World Heritage Site housing the Scottish Collection is maintained. This reinforces the key values of the WHS. The impact of the proposals are assessed fully in design section 3.3 e).

The proposals will not adversely impact on the OUV of the World Heritage Site.

The proposal complies with Policy ENV1 of the Edinburgh City Local Plan.

c) Setting

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

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

Monuments, buildings, gardens and settlements were almost always placed and orientated deliberately, normally with reference to the surrounding topography, resources, landscape and other structures. Over time, these relationships change, although aspects of earlier settings can be retained.

Setting can therefore not simply be defined by a line on a map, and is likely to be unrelated to modern landownership or to curtilage, often extending beyond the immediate property boundaries into the wider area and broader landscape context.

The siting and the setting for the galleries buildings were conceived as a planned arrangement that would complement the key views across the city to and from the Castle. East Princes Street Gardens (EPSG) are an important component of the setting of Edinburgh Castle and thereby the NGS/RSA complex arrangement.

Although the detailed design and arrangement of the gardens has evolved and changed, the critical form of the valley and the wooded nature of the valley are key attributes of the landscape that establish the configuration of the setting. These factors are outlined in the conservation policies for EPSG.

The current scheme provides a replacement facade for the PSA wing, rather than the previously consented projecting extension from the building. This will reduce the impact the development will have within its immediate and wider setting. The grass banking will remain as will the existing parapet configuration. The existing bronze balustrade/railings on top of the walling are also retained in this current application.

The success of the existing 1978 PSA extension façade is, to an extent, in its reticence. The lower ground floor level windows are deeply recessed within a modern simple bronze façade forming a plinth to the building above. The new proposals are predominately masonry in form and will share this restrained approach, having an element of solidity and chamfered inset windows and only one larger picture window, as before, in the introductory section to the Scottish Collection. In this application the picture window is contained within the body of the façade and does not break the wall/balustrade above, reducing its impact.

While the loss of trees along the frontage to the NGS will change the view to the building, the principle arrangement of the natural/ designed environment, the wooded form of the valley will be unchanged. The impact on the setting for the Galleries and the Castle will be minor. Historic Environment Scotland support the principle of the works and the coherent vision behind this current application as successfully accessing and incorporating the extended Scottish Collection within the overall Galleries complex.

The proposal complies with Policy ENV3 of the Edinburgh City Local Plan.

d) Impact on Character of the New Town and Old Town Conservation Areas

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

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

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

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

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

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

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

The essential character of the Old Town Conservation Area, which is located to the south of the application includes:

"Dramatic gateways over the Waverley Valley.

Landmarks buildings and townscape.

Vistas and views Townscape Site and buildings combine to form one of the most spectacular and romantic townscapes in Europe".

The removal of the 1978 PSA extension will not compromise the integrity of the listed structures and will not adversely affect the character or appearance of the conservation area. This later element is of interest but its removal and replacement with a high quality stone and glass facade is justified. Its inconspicuous location in the conservation area means that the impact of its loss will be minimal. New external interventions to the listed buildings will be mostly limited to basement level and are of high quality design and materials. They will be sympathetic to the buildings and the area.

The elements proposed in this application will preserve the character and appearance of the conservation area.

The proposal complies with Policy ENV6 of the Edinburgh City Local Plan.

e) Building Design

LDP policy Des 1 provides that the design of a development should be based upon the positive characteristics of the surrounding area, to create or reinforce a sense of place, security and vitality. It further provides that planning permission will not be granted for poor quality or inappropriate design, or for proposals which would be damaging to the area's character or appearance, particularly where this has a special importance (such as at the application site).

The principal aspect of the design, the requirement for the Scottish Art Collection to be rehoused has informed this proposal.

The proposal has been through a considerable design process and pre application discussions, involving the National Galleries, Hoskins Architects, Edinburgh Council, Network Rail, Historic Environment Scotland and Edinburgh World Heritage.

A key objective of the design, and any proposed changes to the Galleries elevations, should simplify and reinforce the 'plinth' onto which the Galleries buildings sit as a part of the city level which is continuous with Princes Street.

Prior to the submission of both the 2015 and 2017 applications, the NGS held a public exhibition in May 2015 to allow wider engagement with the project and the future of the building. The client and the design team presented these proposals to the Edinburgh Urban Design Panel.

The Panel reviewed the 2015 scheme and supporting design approach, and although this current reduced scheme was not required to be presented to the Panel, it is considered that the principles of the review are also relevant for this application. The 2015 proposals were received favourably.

The Panel supported the approach of the building design responding to the landscape setting, the sensitive and analytical approach in informing the design approach for the new plinth to the buildings and the design approach to the internal alterations. In developing the proposals the Panel suggested consideration should be given to the architectural coherence of the proposals and materials alongside the existing Weston Link frontage, details of the proposed parapet and handrails and a close working relationship with the City of Edinburgh Council with respect to the management and enhancement of the adjacent East Princes Street Gardens.

The application has been submitted with a comprehensive Design and Access Statement which sets out the main objectives for the project to improve accessibility, widen participation and enhance the visitor experience. The rationale for changing the well designed architectural elevation is not aesthetic, it is intended to improve the function of the spaces behind it. The existing spaces behind the PSA extension were private, in use as offices and not for public show. Only small numbers of people were able to access these interiors, but the spectacular views out to the Garden and Designed Landscape, World Heritage Site and conservation areas are outstanding and unrealised. The new proposals would provide public gallery space within a new elevation; this would enable views outwards by large numbers of the public. The vertical size of the windows would be increased, so that the interiors of the galleries would be visible from the gardens.

The proposed design has a regular rhythm and strong verticality. The elevation would be detailed to emulate a solid masonry wall, rather than appearing as a veneer of stone cladding. The design of the stone facade will have an element of solidity but with chamfered inset windows and only one larger picture window, as in the previous application, in the introductory section to the Scottish Collection. In this application the picture window is contained within the body of the façade and does not break the wall/balustrade above, reducing its impact. The use of tooled stonework rather than solid ashlar is welcomed and will add interest to this elevation. The tooled stonework is a successful feature of the Weston Link. The proposed elevation would therefore enhance architectural character by re-establishing the unity of appearance, by creating a continuous plinth.

The design of the overall development scheme respects the site's sensitive location and draws upon the positive characteristics of the area, in terms of its landscape and heritage value, in accordance with the provisions of policy Des 1 and Des 3 (Development Design) of the LDP and the associated policies of the LDP, as well as the Edinburgh Design Guidance.

It is recommended that a sample panel will be constructed on site. This will show the high quality of the proposal in respect of the proposed external material and its detailing. If Committee is minded to grant the application, a condition is recommended to secure this sample panel.

f) Impact on landscape

Policies ENV 1 Edinburgh World Heritage Site; Env3 (Listed Buildings - Setting) Des 1, Des 3 and Env 7 - Historic Gardens and Designed Landscapes and ENV 11 Landscape Quality seek to protect the characteristics of the Gardens.

Princes Street Gardens is listed within the Inventory of Gardens and Designed Landscapes. They are considered 'outstanding' in the category of Work of Art, Historical value and Scenic Value. The 'Picturesque' landscape with the backdrop of the Old Town skyline and the castle was designed as a pleasure ground and has evolved over time to the gardens we are familiar with today.

As a candidate Special Landscape Area, Princes Street Gardens are described as 'An iconic city centre open space of historical and cultural significance.' Their evolution, described as 'The Gardens' natural hollow, is the product of eastward glacial scour around the volcanic crag formation of Castle Rock to form the Nor'Loch, a feature enhanced as part of the Old Town's defences. In the 18th century the area became part of the ensemble of the neo-classical New Town. The West Gardens were first laid out as private pleasure ground for residences at the west end of Princes Street, before joining one of the first public parks established within Scotland at East Princes Street, with the arrival of the railway.

The description goes on to say 'the gardens are an important recreational resource within the city centre and are well used to residents and visitors, playing host to a range of events'.

The Gardens are an important feature in views from elevated viewpoints such as Castle Rock, The Mound, North Bridge and Calton Hill, and for those arriving in the city by train. They form a unique foil between the Medieval and Renaissance Old Town and neo classical New Town'.

The Council prepared a conservation management plan for the gardens in 2003 prepared for the Council by Peter McGowan Associates, and subsequently a Management Plan 2010-15 which was updated in 2011. The Conservation Management Plan makes a detailed assessment of the significance of Princes Street Gardens in relation to its major features and values. The key factors of significance include, the gardens as setting for buildings of outstanding refinement and cultural significance including the RSA and NGS Galleries and the Scott Monument in Princes Street Gardens; a unique source of passive recreational experience; one of seven Premier Parks in Edinburgh; and a space of outstanding quality. The gardens are an important venue for a range of events and activities managed by the Council. The Edinburgh Parks Events Manifesto sets out a framework to ensure a balanced programme of events take place.

The Conservation Management Plan details 20 Conservation Policies which include maintaining and enhancing key views; enhancing the physical relationship between the gardens and adjoining streets and public places, and develop the gardens character as a green, open and restful haven for passive recreation, away from the adjoining streets; to improve the quality of the landscape and features within the gardens and to manage the gardens to the benefit of the city economy.

These policies underpin the overall goal 'to conserve and enhance Princes Street Gardens and their urban setting and to maintain their history of evolution and primary passive recreational function; to promote understanding of their cultural significance; and to present them to a standard which exemplifies their civic and national status within the World Heritage Site and respects ifs sensitivity'. The aims of the management plan outline in greater detail how the overall goal can be delivered and seeks to assess impacts of future development proposals against the conservation plan policies.

The development proposes changes to the gardens that respond to the new requirements for access, circulation and enhancements that seek to improve the use of the gardens for visitors and increased use of the cultural asset of the galleries.

- The proposals will conserve the setting of views to Edinburgh Castle and to the Scott Monument:
- Sensitive and well design changes to the entrances into the gardens will enhance the views and physical relationship between the gardens and the adjoining streets and public spaces;
- The changes to the grass slopes with formal grass terraces and new connecting footpaths will work with the existing levels and thereby conserve the form of the valley;
- The new footpath arrangement eliminates the deficiencies of access to the gardens;
- The design retains the historic resources of the site, retaining the relationships of garden to building and important boundary features and natural landscape features.

- The removal and management of tree cover and replacement planting will conserve the appearance of the gardens as a wooded valley in long views, while opening up cross views;
- Retaining the entrances and boundary features of the gardens; working with the
 existing landscape structure and bringing modest activity to a new terrace will
 maintain the balance of the garden as an open and restful haven away from the
 busy city streets;
- The design will conserve buildings and features of quality and ensure that new features provide a coherent quality of materials and detailing;
- The proposed public realm arrangements will bring improvements to the culturally significant monuments and memorials, reintroducing a hard landscape terrace around the John Wilson statue.
- The introduction of revised tree planting and management will help to reintroduce the 'picturesque' setting of the galleries and help to reduce the effect of the new elevation/ plinth feature.
- The new grass terraces will provide a contemporary solution and be compatible
 with the introduction of a new paved terrace. These solutions respond to the
 contemporary demand for improved access and use of the galleries as a key
 cultural asset in the World Heritage Site;
- The capacity of the landscape and types of uses enjoyed by visitors to the gardens will be maintained by the proposals. Special events will continue to be able to use the spaces, enhanced with new access arrangements.
- The proposals have sought to develop biodiversity, ensuring tree planting is reintroduced;
- Lighting designs will ensure that the proposals maintain the balance of dark space.

In summary, the proposal will make changes to features of East Princes Street Gardens. These changes will be designed in such a way that will provide improvement to the layout, management and arrangement of the gardens. Undertaken to a high quality, these changes will have a long term positive effect on the landscape. The grass embankments are in some areas very steep. These will always run the risk of failing. The final installation will require to be carefully specified and CEC Parks department involved. A condition requesting details of the method of stabilization and grass species will ensure that Parks are involved in the final design of the embankments. The impact of the new large paved area will be determined by the colour, texture and type of stone selected.

The proposal complies with Policy Env 7 - Historic Gardens and Designed Landscapes and Policy ENV 11 Special Landscape Areas of the Edinburgh Local Development Plan.

g) Impact on views

The impact of the proposed development on the character and the visual amenity has been examined in the consultants Townscape and Visual Impact Assessment. A limited assessment of views has been undertaken. The assessment has considered the impact of the new development including changes to the gardens and has not considered impacts of the construction phase.

The photographic before and after montages are illustrative and are not presented as verified views. The images present nine views in total, including one night view from North Bridge.

Views from Calton Hill, identified in the Special Landscape Area description have not been assessed.

City view- View from the Scott Monument

This is the most prominent viewpoint that illustrates the proposed changes. While new public realm improvements with new paths, terraces and steps will be visible against the new façade of the Weston Link and new gallery, the overriding change to the view will result from the changes in tree cover in Princes Street Gardens. The materials chosen for the paving and on the elevation will therefore be important. The scheme proposes new tree planting that aims to re-establish the tree positions originally envisaged in the original plans.

City view- View from North Bridge

The changes to the view result from the loss of tree planting in the gardens and from the view of the new elevation. Both of these are seen against the exposed elevation of the National Gallery. Exposing the view enables the original 'plinth' onto which the galleries complex sits to be re-established. The relocation of new tree planting and using a suitable colour for the new elevation will allow the proposal to recede back against the more dominant National Gallery elevation and to re-establish the building into the 'picturesque' landscape setting.

City View - Night Time View- view from North Bridge

The new elevation will be visible in views at night, extending the lit part of the 'complex' below the plinth in a similar manner as the Weston Link is highlighted below the RSA building. The railway cutting and tunnel, seen in this view, prevents the tree cover afforded to other parts of the gardens and therefore results in a greater impact as a result of the tree loss. New trees planting will be critical to ensure that impacts of the new development are planned as an integral part of the re-design of the gardens.

City View- Castle Ramparts

The galleries complex forms an important part of the composition of the view across the Waverley Valley from the Castle. A change to the green backdrop for the Galleries complex will result from the loss of the tree cover, opening up of views of the terraces on the north side of the gardens. New tree planting will, over time, renew this backdrop.

All of these views highlight the immediate changes in context to the Galleries complex on the Mound and the relationship with Princes Street Gardens. The proposal will reintroduce and extend a hard landscape treatment and changes to the existing boundaries at the interface between the two areas of open space. There will be a significant change to these views, however the arrangements will provide more urban space to improve pedestrian movements and increase the use of these locations.

In summary, the site is part of an internationally recognised landmark in the city's views and visible from the Castle, Calton Hill and North Bridge. The site is also seen in more local views from Waverley Bridge and on approaches to the site through East Princes Street gardens.

The development will change the unique views of this site, opening up views and extending the dominance of the plinth below the Galleries complex above.

A permanent change will be visible to city views taking in the galleries complex at the Mound. The strong plinth and elevation, established with the Weston Link, below the individual buildings will be completed with the new proposals. Tree loss that has to take place to facilitate the changes will expose the complex in its new setting. New tree planting and reshaped landscaping will be critical to ensure that the original 'picturesque' setting is re-established for these views. Changes to the footpaths and new terrace will increase the hard landscape setting to the buildings. It will be critical to ensure that new landscape proposals and especially tree planting undertaken as part of the development and as part of the long term management of the site ensure that these changes are integrated into the gardens and the setting of the buildings.

Local views will perceive the greatest change as a result of the development proposal. Careful design of boundaries, features and the use and colour of materials will be critical to the success and integration of the changes.

The proposal does have an immediate impact that does not comply with policies Des 1, Des 3 however the impact will diminish over time as the trees and the landscape will recover and the final landscape will be improved whilst maintaining the key characteristics protected by policy.

h) Impact on Soft and Hard landscaping

The proposals for the design of the soft landscaping and planting schemes are shown in accompanying landscape drawings. Drainage plans have also been submitted as part of the application.

There is a comprehensive landscape and public realm plan which supports the proposed extension to the National Gallery. The proposals aim to improve accessibility into the gardens, and provide an enhancement of the paving along with management of the tree planting and reconfigured soft landscaped areas.

The supporting Design Statement and conservation plan highlight that changes to the arrangement of landscaping to the Galleries and to Princes Street Gardens have changed a number of times in the past. The hard landscaping design responds to the modern extension proposed. The proposed changes will be designed and detailed to a high quality, incorporating and protecting original details as much as possible. The proposals will offer an improved arrangement for access and use of the gardens. This opportunity would outweigh any impacts on original features.

The proposal complies with LDP Policies Des 5 and Des 3, and LDP Policy ENV 3.

i) Impact on trees

Ecological matters are outlined in the supporting design statement.

Daytime Bat surveys have been undertaken and found no sign of bat roosts or sites suitable for roosting on any of the buildings or trees that would be demolished/removed as part of this proposal. Deteriorating parts of the existing building may be suitable for bats and therefore further surveys are recommended prior to the works taking place. A condition should be applied for such details to be provided prior to any development commencing on site.

There are thirty nine trees worthy of retention on the site (Category A and B in the tree survey) are being removed to facilitate development. A further eleven trees of lower quality are also being removed. These are mostly young trees. Twenty two trees are being planted a part of the replacement planting. This is acceptable because the replacement of all the trees would be inappropriate with the new layout. The final selection of trees will be developed in consultation with the Council.

A tree protection drawing has been submitted to indicate how trees will be protected on site, however the drawing does not convey the detail required. A condition will ensure such details are provided and agreed prior to any development commencing on site.

Currently the trees contribute to the designed landscape and are an important component of the 'picturesque' landscape setting for the galleries and the gardens. The loss of these trees will have an impact on the landscape in the short term, until the new replacement trees are able to provide the new setting, allowing new and managed views to the buildings.

Some removal of trees in the gardens is desirable as some of the trees are over mature and no longer provide the desired and intended setting for the buildings in the galleries complex. The removal of the proposed trees would improve these views and would be moderately beneficial.

Their loss is contrary to LDP policies ENV 12 (Trees) and Des 5 which looks to safeguard trees worthy of retention for incorporation into the design.

However, the volume of tree planting currently on site will be replaced in the proposals with new tree planting. The drawings provided do not reflect some of the discussion about replacement planting and therefore conditions should be applied to agree the suitable replacement of all of the trees lost in the gardens. These trees will either be planted as part of the comprehensive scheme proposed or used to supplement tree planting and management elsewhere in Princes Street gardens.

The proposal complies with Policies ENV 12 (Trees) and Des 5 of the Edinburgh City Local Plan.

j) Impact on Open Space

Princes Street Gardens is Edinburgh's central garden and its most famous open space, lying in the centre of the city between the Old Town and New Town.

Policy OS 1 seeks to protect "all open spaces, both public and privately owned, which contribute to the amenity of their surroundings and the city, which provide or are capable of providing for the recreational needs of residents and visitors or which are an integral part of the city's landscape and townscape character and its biodiversity".

The current proposal seeks to form a new facade to the Gallery at basement level. The grass bank between the gallery and the gardens will be retained. The loss of open space will therefore be minimal.

The Galleries already have a presence in the gardens with the Weston Link. The proposed new Gallery for the SNG will attract an increased number of visitors into the gardens. The purpose of the scheme is to improve the cultural, leisure and educational facilities, and is complimentary to the gardens, rather than for commercial use. The proposals are therefore justifiable in this instance.

The Director of Culture and Leisure raises no comments to the proposal. The construction works will have a temporary impact on the gardens and conditions are recommended regarding the construction programme and to ensure that the planting and paths are returned to their original state.

The proposal complies with Policy OS 1 of the Edinburgh City Local Plan.

k) Archaeology

Based on the historical and archaeological evidence the building has been identified as being of regional importance. Accordingly, these applications must be considered under the terms of Scottish Government's 'Our Place in Time' policy, Scottish Planning Policy (SPP) and Historic Environment Scotland Policy Statement (HESPS) 2016 and Edinburgh Local Development Plan (2016) policies ENV4, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

The development will require significant excavations into the surviving Mound, a structure of archaeological significance in its own right, but may also impact upon the remains associated with the first Crawley Tunnel and potentially elements of Edinburgh's Old Town buried beneath the Mound. Accordingly it is regarded as essential that an archaeological mitigation strategy is agreed prior to development in order to ensure for the excavation, recording and analysis of any surviving archaeological remains.

In order to safeguard the archaeological interests of the existing buildings and the earth below, the use of a condition is recommended, if Committee is minded to grant the application.

It is recommended that these programme of works be secured using a condition based upon the model condition stated in PAN 42 Planning and Archaeology (para 34).

The proposal complies with ENV8 & ENV9 of the Edinburgh City Local Plan.

I) Sustainability

The proposals include a high efficiency gas fired condensing boiler plant installation with zoned heating to all areas of the building, new AHU systems, the introduction of a 'wide band' ' temperature and humidity controls and new air conditioning systems. All lighting is provided by high efficiency LED fittings.

The agent has provided further information on Sustainability issues in Section 6.7 of the Design and Access Statement.

The proposal accords with the requirements of Policy Des 6 of the Edinburgh Local Development Plan.

m) Representations have been considered

No representations have been received.

n) Impacts on equalities or human rights are acceptable

The proposals have been assessed for impacts on equalities and human rights. The development would improve the accessibility of the building. Level access would be provided and there would be lifts to allow access to its various levels.

The proposed public realm works would improve accessibility, including those with mobility issues within the galleries and within the wider gardens.

Impacts on equalities and rights are acceptable.

Conclusion

The proposal is acceptable in principle and represents sustainable development as defined by the Edinburgh Local Development Plan (LDP).

The proposal is acceptable with respect to layout, scale and design and it will not have an adverse impact on the character and appearance of the site or the New Town or Old Town Conservation Areas. The proposed extension will not have any adverse impact on the setting of listed buildings and will not impact on the Outstanding Universal Value of the World Heritage Site. The proposed public realm alterations are an enhancement to East Princes Street Gardens. The proposal complies with relevant policies in the Development Plan and associated non-statutory guidance.

The proposal is acceptable. There are no material considerations which outweigh this conclusion.

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

3.4 Conditions/reasons/informatives Conditions:-

- No development shall take place until the applicant has secured the implementation of a programme of archaeological work, in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Planning Authority, having first been agreed by the City Archaeologist.
- 2. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
- 3. A sample of masonry work, indicating courses, surfacing finish and pointing, shall be prepared for inspection on site and shall be approved in writing by the Planning Authority, before work commences on site.
- 4. A sample of masonry work, indicating courses, surfacing finish and pointing, shall be prepared for inspection on site and shall be approved in writing by the Planning Authority, before work commences on site.
- 5. The approved landscaping scheme shall be fully implemented within the first planting season of the completion of the development; and thereafter shall be maintained by the applicants and /or their successors to the entire satisfaction of the Planning authority; maintenance shall include the replacement of plant stock which fails to survive for whatever reason, as often as required within the first 5 years of the completion of the development, to ensure the establishment of the approved landscaping scheme.
- 6. A tree protection plan providing full details of all measures to be put in place to safeguard existing trees on the boundary of the application site prior shall be submitted to and approved by the Planning Authority before works commence on site and the approved measures shall be adhered to at all times during the course of development works. The tree protection measures must be maintained during the entire development process and not altered or removed unless with the written consent of the Planning Authority.
- 7. A fully detailed landscape plan, including details of all hard and soft surface and boundary treatments and all planting, shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.
- 8. The final detailed design of the embankment and details of the stabilisation methods and grass species proposed shall be provided and approved in writing by the Planning Authority, before work commences on site.
- 9. Details of the proposed tree pit details including the tree pit under tree 109 adjacent to the statue shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.

- 10. Details of the final design of the new railings shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.
- 11. Details of the final design of the proposed markers shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.

Reasons:-

- 1. In order to safeguard the interests of archaeological heritage.
- 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. In order to enable the planning authority to consider this/these matter/s in detail.
- 5. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site
- 6. In order to safeguard protected trees.
- 7. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site
- 8. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site
- 9. In order to enable the planning authority to consider this/these matter/s in detail.
- 10. In order to enable the planning authority to consider this/these matter/s in detail.
- 11. In order to enable the planning authority to consider this/these matter/s in detail.

Informatives

It should be noted that:

- 1. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
- 2. This consent is for planning permission only. Work must not begin until other necessary consents, eg listed building consent, have been obtained.
- No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.

- 4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
- 5. Details of all changes in ground levels, laying of foundations, piling works and operation of mechanical plant in proximity to The Mound 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, contact details below:

Network Rail Asset Protection Engineer 151 St. Vincent Street, GLASGOW, G2 5NW

Tel: 0141 555 4352

E-mail: AssetProtectionScotland@networkrail.co.uk

- 6. TRAMS Important Note
 - The proposed site is on or adjacent to the operational Edinburgh Tram. An advisory note should be added to the decision notice, if permission is granted, noting that it would be desirable for the applicant to consult with the tram team regarding construction timing. This is due to the potential access implications of construction / delivery vehicles and likely traffic implications as a result of diversions in the area which could impact delivery to, and works at, the site. Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Council and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:
 - Any work where part of the site such as tools, materials, machines, suspended loads or where people could enter the Edinburgh Tram Hazard Zone. For example, window cleaning or other work involving the use of ladders;
 - Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone;
 - Piling, using a crane, excavating more than 2m or erecting and dismantling scaffolding within 4m of the Edinburgh Trams Hazard Zone;
 - Any excavation within 3m of any pole supporting overhead lines;
 - Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when the equipment is in use:
 - The Council has issued guidance to residents and businesses along the tram route and to other key organisations who may require access along the line;

- See our full guidance on how to get permission to work near a tram way;
 and
- http://edinburghtrams.com/community/working-around-trams.

Note:

It is understood that Playfair Steps and the footway northwards on the eastern side of the Scottish National Gallery is maintained by the Scottish Government and is not a City of Edinburgh Council 'road'.

- 7. If works are not undertaken to seal this section of the wing prior to the onset of the next active season (May 2018) then an additional pre-works inspection should be undertaken before works commence on site.
- 8. Clearance of vegetation/trees from the proposed construction areas has the potential to disturb nesting birds; therefore clearance should be carried out outside the bird nesting season March August (inclusive). Should it be necessary to clear ground during the bird nesting season the land should be surveyed by a suitably qualified ecologist and declared clear of nesting birds before vegetation clearance starts.
- Planning and landscaping details should be discussed and developed with Parks and Greenspace prior to submission and approval in writing by the Planning Authority.
- 10. Prior to the commencement of development the applicant works with Parks and Greenspace and Estates on construction access and periods of limitations of access to East Princes Street Gardens and discussions to take place with City of Edinburgh Council Events to ensure the proposed works do not affect the Capital Christmas Programme.
- 11. Before development takes place the applicant shall provide details of a clearly delineated space to be identified in which tables and chairs for the Galleries cafe operations can be placed to allow management of the space for diners and pedestrians accessing the area.

Financial impact

4.1 The financial impact has been assessed as follows:

There are no financial implications to the Council.

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

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

The application was advertised on the 12 January 2018.

No letters of representation were received.

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 The site is located within the City Centre as identified in

the Edinburgh Local Development Plan. The site is also within the World Heritage Site, New Town and Old Town Conservation Areas. The site is a registered Garden and Designed Landscape (New Town Gardens)

and is identified as Open Space.

Date registered 13 December 2017

Drawing numbers/Scheme 1-58,

Scheme 1

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

Contact: Diana Garrett, Planning Officer

E-mail:diana.garrett@edinburgh.gov.uk Tel:0131 529 3620

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 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 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 12 (Alterations and Extensions) sets criteria for assessing alterations and extensions to existing buildings.

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

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

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

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

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

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

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 7 (Public Transport Proposals and Safeguards) prevents development which would prejudice the implementation of the public transport proposals and safeguards listed.

Relevant Non-Statutory Guidelines

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

Non-statutory guidelines - 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 'ADVERTISEMENTS, SPONSORSHIP AND CITY DRESSING' Provides guidance on proposals for advertisements, imposing restrictions on adverts on street furniture, hoardings, and at the roadside, and outlining the circumstances in which sponsorship, city dressing, banners and adverts on scaffolding should be acceptable.

Non-statutory guidelines 'ART IN PUBLIC PLACES' set out good practice to ensure that contemporary art works match the quality of the past, and enhance and contribute to the environment.

Other Relevant policy guidance

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

World Heritage Site

The historic centre of Edinburgh, including the medieval Old Town and the Georgian New Town, was inscribed on the United Nations Education, Scientific and Cultural Organisation's (UNESCO's) List of World Heritage Sites in December, 1995. This represents international recognition that the Site is of outstanding universal value.

The organic plan form of the medieval Old Town and the clarity of the geometrically planned neo-classical New Town together with the outstanding historic buildings are fundamental characteristics of the World Heritage Site. All proposals affecting the plan form or historic buildings, including their setting, will be considered for their impact on their design integrity.

Appendix 1

Application for Planning Permission 17/05832/FUL At National Galleries Of Scotland, 1 The Mound, Edinburgh Alterations and extension to the 1978 Property Services Agency (PSA) wing with adjoining interior alterations to the Scottish National Gallery (SNG) and the 2004 Weston Link, new and improved service and pedestrian access, landscaping, public realm and other works to achieve improved connections between galleries, gardens and the city beyond.

Consultations

HISTORIC ENVIRONMENT SCOTLAND

We have had pre-application discussions regarding this much-reduced (from the previous consent) scheme to revitalise and extend the Scottish Collection within the National Galleries complex on the Mound.

In this letter we are responding to the planning permission for works to the A listed building and its setting. The setting of other A listed buildings, and the potential impact the development may have on the World Heritage site. The site is also within the New Town Gardens designed landscape and the New Town Conservation Area.

As before, we support the principle of the works.

Regarding demolition works, we previously expressed our view that the bronze façade of the PSA wing and the rear (northern) access stair to lower ground level had a certain interest in terms of the architectural evolution of the building. This view was shared, to an extent, within the Conservation Plan which allocated them a moderate significance. However, we judged that the benefits within the overall project would make their loss acceptable. This remains our view.

The revised scheme provides a replacement façade for the PSA wing, rather than a projecting extension from the building. This will immediately reduce the impact the development will have within its immediate (and wider) setting. The grass banking remains as does the existing parapet configuration, and, being on a different plane, also makes the different design approach proposed (from the architecture of the Weston link) easier to achieve.

The success of the PSA extension façade is, to an extent, in its reticence, with the lower ground floor level windows deeply recessed within a modern unadorned bronze façade forming a plinth to the building above. The new proposals, being predominately masonry in form will share this restrained approach, having an element of solidity and chamfered inset windows and only one larger picture window, as before, in the introductory section to the Scottish Collection. In this application the picture window is contained within the body of the façade and does not break the wall/balustrade above, reducing its impact.

We welcome the intention to utilised tooled stonework rather than polished ashlar, a successful feature of the Weston Link.

We also welcome the retention of the PSA wing's handsome bronze balustrade/railings atop the walling, and might suggest a similarly detailed approach for the new railings proposed to access East Princes Street Gardens.

We have commented before on the public realm improvements and our previous view on the alterations has not changed.

We do not consider that the new extension will impact adversely on the OUV of the World Heritage site or the setting of adjacent A listed buildings.

In conclusion, we support the principle of the works and can see the coherent vision behind successfully accessing and incorporating the revamped Scottish Collection within the overall Galleries complex

ARCHAEOLOGY

Further to your consultation request I would like to make the following comments and recommendations concerning these linked LBC & FUL applications for alterations and extension to the 1978 Property Services Agency (PSA) wing with adjoining interior alterations to the Scottish National Gallery (SNG) and the 2004 Weston Link, new and improved service and pedestrian access, landscaping, public realm and other works to achieve improved connections between galleries, gardens and the city beyond.

The two A-listed Playfair Galleries (RSA & NG) forming the National Galleries of Scotland site on The Mound lie at the centre of Edinburgh's UNESCO world Heritage site and of national importance. The galleries built bin the 1820's and 1850's respectively occupy the Mound a monument in its own right. Dating from the 1780's as a short cut across the newly drained Nor Loch the mound comprises a mix of midden material from Edinburgh's Old Town and landfill derived from the construction of the New Town. The Mound was also built over the remains of buildings associated with Edinburgh's Old Town the last of which appears to be a tanning yard shown on Kincaid's Plan of 1784.

The Crawly Tunnel was constructed across the Mound in 1822 to deliver water to the New Town. This nationally significant feat of Georgian Engineering (still in use today) had to be diverted soon after its completion by the construction of the RSA. Evidence for this was revelled during the recent construction of the Edinburgh Tram, where a disused section was recorded heading towards the RSA, whilst the 1825 diversion was built to extend around the RSA to the west under the present day road.

Based on the historical and archaeological evidence the building has been identified as being of regional importance. Accordingly, these applications must be considered under terms Scottish Government's Our Place in Time policy, Scottish Planning Policy (SPP) and Historic Environment Scotland Policy Statement (HESPS) 2016 and CEC's Edinburgh Local Development Plan (2016) policies ENV4, ENV8 & ENV9. The aim should be to preserve archaeological remains in situ as a first option, but alternatively where this is not possible, archaeological excavation or an appropriate level of recording may be an acceptable alternative.

Historic Buildings

The proposals will require significant alterations to the existing A-listed Galleries. However having assessed these impacts, I concur with Simpson & Brown's 2017 Heritage Impact Assessment (section 6.7) that it is considered that on the whole such impacts would be considered as having a low archaeological impact. It is therefore recommended that a historic building survey (photographic and written survey, annotated plans and elevations) is undertaken of the areas affected prior to and during demolition/alterations.

Buried Archaeology

The development will require significant excavations into the surviving Mound, a structure of archaeological significance in its own right, but may also impact upon the remains associated with the first Crawley Tunnel and potentially elements of Edinburgh's Old Town buried beneath the Mound. Accordingly it is regarded as essential that an archaeological mitigation strategy is agreed prior to development in order to ensure for the excavation, recording and analysis of any surviving archaeological remains.

Interpretation

Given the potential importance of these remains it is essential that the excavations contain a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards) the scope of which will be agreed with CECAS.

It is recommended that these programme of works be secured using a condition based upon the model condition stated in PAN 42 Planning and Archaeology (para 34), as follows:

'No demolition nor development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic Building Survey, Excavation, reporting and analysis, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

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

NETWORK RAIL

Whilst Network Rail has no objections in principle to the proposal, due to its close proximity to The Mound 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 The Mound Tunnels (including sidewalls) by the proposed development. All proposed works adjacent to the tunnel must be subject to further discussions and agreement with Network Rail.

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

• Details of all changes in ground levels, laying of foundations, piling works and operation of mechanical plant in proximity to The Mound 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, contact details below:

Network Rail Asset Protection Engineer 151 St. Vincent Street, GLASGOW, G2 5NW

Tel: 0141 555 4352

E-mail: AssetProtectionScotland@networkrail.co.uk

ENVIRONMENTAL PROTECTION

Environmental Protection raised no concerns with a previous proposals to extend and re-model the Scottish Collection Gallery in the plinth of the Scottish National Gallery. Works included creating new stair links from the Playfair gallery and opening up the new gallery space to the Weston link concourse in the plinth. An accessible route was to be formed in Princes Street Gardens down to the lower level entrance (15/05795/FUL). This application is similar in nature and Environmental Protection offered no objection to the 2015 application.

However, we need to highlight the fact that the site is located in close proximity to the city centre air quality management area. The applicant has advised it is committed to improving energy efficiency and increase sustainability. Environmental Protection would recommend that the applicant installs electric vehicle charging points into the car parking area, this will enable the fleet serving the museum will be able to convert over to electric.

It is highlighted in Edinburgh's Local Transport Strategy 2014-2019 that the Council seeks to support increased use of low emission vehicles and support the extension of the network of EV charging points.

The City of Edinburgh Parking Standards for Development Management also now encourages the use of EVs. It states that the Council is likely to introduce a requirement for EV charging infrastructure which depends on how charging technology evolves this includes:

- Dedicated parking spaces with charging facilities.
- Ducting and infrastructure to allow electric vehicles to be readily accommodated in the future.

Developers should now consider the potential for EV charging as they develop their proposals. Based on currently available technology Environmental Protection recommends that at least one EV charging outlet should be of the following standard serving the non-residential car spaces:

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.

Grants are also available for the installation of EV charge points from the Scottish Energy Saving Trust. More information can be found at:

http://www.energysavingtrust.org.uk/scotland/Organisations/Transport/Electric-vehicles/Electric-Vehicle-Charge-Point-Funding

The Scottish Government in the 'Government's Programme for Scotland 2017-18 has a new ambition on ultra-low emission vehicles, including electric cars and vans, with a target to phase out the need for petrol and diesel vehicles by 2032. This is underpinned by a range of actions to expand the charging network, support innovative approaches and encourage the public sector to lead the way, with developers incorporating charging points in new developments.

Therefore, Environmental Protection would not object to this application regarding local air quality but recommend an informative on EV Infrastructure being included.

Therefore, Environmental Protection has no objections to this proposed development.

1. Prior to the use being taken up, two rapid electric vehicle charging point, capable of 70 -50kW (100 Amp) DC with 43kW (63 Amp) AC output shall be installed in the commercial car parking area

TRANSPORTATION

No objections to the application.

TRAMS - Important Note

The proposed site is on or adjacent to the operational Edinburgh Tram. An advisory note should be added to the decision notice, if permission is granted, noting that it would be desirable for the applicant to consult with the tram team regarding construction timing. This is due to the potential access implications of construction / delivery vehicles and likely traffic implications as a result of diversions in the area which could impact delivery to, and works at, the site. Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Council and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:

o Any work where part of the site such as tools, materials, machines, suspended loads or where people could enter the Edinburgh Tram Hazard Zone. For example, window cleaning or other work involving the use of ladders;

- o Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone:
- o Piling, using a crane, excavating more than 2m or erecting and dismantling scaffolding within 4m of the Edinburgh Trams Hazard Zone;
- o Any excavation within 3m of any pole supporting overhead lines;
- O Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when the equipment is in use;
- o The Council has issued guidance to residents and businesses along the tram route and to other key organisations who may require access along the line. See our full guidance on how to get permission to work near a tram way http://edinburghtrams.com/community/working-around-trams

Note:

It is understood that Playfair Steps and the footway northwards on the eastern side of the Scottish National Gallery is maintained by the Scottish Government and is not a City of Edinburgh Council 'road'

EDINBURGH WORLD HERITAGE

No formal comments received

EDINBURGH ACCESS PANEL

No formal comments received

NEW TOWN AND BROUGHTON COMMUNITY COUNCILS

No formal comments received

OLD TOWN COMMUNITY COUNCIL

No formal comments received

CULTURE AND SPORT

No formal comments received

ARCHITECTURE AND DESIGN SCOTLAND

No formal comments received

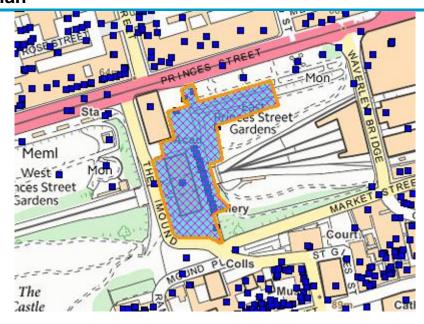
MUSEUMS AND GALLERIES

No formal comments received

PARKS AND GREENSPACE

No formal comments received

Location Plan



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