

Development Management Sub Committee

Wednesday 20 June 2018

**Application for Listed Building Consent 17/05842/LBC
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 (b)
Report number	
Wards	B11 - City Centre

Summary

The application complies with the Development Plan and Non-statutory guidance. On balance, the proposals have no adverse impact on the architectural integrity and composition of the building ensuring that its special character is preserved. The proposals will ensure the long term use of this internationally important category A listed building. The proposed conservation based approach to this project results in significant wider conservation benefits.

Links

Policies and guidance for this application	LDPP, LEN03, LEN02, LEN04, LEN06, LDES12, NSG, NSLBCA, CRPNEW, CRPOLD,
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Report

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city beyond.**

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 & Ptns 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 Old Town Conservation Area.

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

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 (application reference 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 and improve environmental controls of RSA. Linking the National Gallery and RSA beneath the mound and provision of education and visitor facilities. General environmental improvements to Mound and vicinity (partly in retrospect) (application reference 01/04617/FUL).

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

06.09.2016 - Listed building consent granted to demolish the 1978 PSA plinth extension elevation and completely remodel the associated existing interior. Works will involve demolition of the south stair and the 2004 north spiral stair as well as removal of a dividing wall between the Weston link concourse and the present Print Room. Works will also involve remodelling the lower level entrance in the Weston Link facade and of internal spaces. New lifts will require works to 1st floor gallery spaces (as amended) (application reference 15/05791/LBC).

13.09.2016 - Planning Permission granted to extend and re-model the current Scottish Collection Gallery. Works will include creating new stair links from the Playfair Gallery above and opening up the new gallery space to the Weston link concourse in the plinth. An accessible route is to be formed in Princes Street Gardens down to a re-modelled lower level entrance together with public landscape re-modelling (as amended) (application reference 15/05795/FUL).

Concurrent application for planning permission:

May 2018 - concurrent application for planning permission 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 17/05832/FUL).

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 project focuses on improving the connections between the buildings to create an enhanced and enlarged gallery for the display of the Scottish Art Collection as well as providing significant public benefits for improved connections between galleries and gardens including access, landscaping, art handling facilities, public realm and other works.

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

NEW FACADE TO PRINCES STREET GARDENS ELEVATION

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. The proposed alterations will allow for controlled daylight to be brought into the space and enhanced circulation to provide a new entrance to the Gallery and simplifying visitor orientation. It also allows for reconfiguring the existing servicing strategy to reduce the amount of servicing required.

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 associated works within Princes Street Gardens are assessed in the concurrent application for planning permission (17/05832/FUL).

PROPOSED ALTERATIONS TO THE INTERIOR:

SOUTH-EAST CORNER

The stair will be removed and a new stair would be constructed in a different location. The existing door to the stair will also be removed. It would be replaced by a double-door which is centred on the axis of the east galleries (rooms 2-7). A well made modern (1980's) mahogany door would be removed. Both lifts would be removed.

GALLERIES 14-18

The existing lift will be repositioned and will extend upwards into the existing galleries. It will be hidden from view by a deep wall with a passageway through.

GALLERY 1

The existing lift will be removed from the western side and the floor area restored. The new lift will be relocated to the eastern side and will serve all levels of the galleries. The final detail of the finished design will be agreed by a condition of the consent.

ENTRANCE HALL

Both the spaces to east and west of the central entrance area will be altered by removing the lift in the west space and forming a new cafe, retaining the route to the north. In the eastern space, the existing lift and stair will remain, but a new lift would be installed between this level and the first floor.

It is also proposed to remove the internal porch which was built in the 1980's. This porch is an approximation of the original porch design. When it was rebuilt it was designed to be demountable. The porch will be taken down and stored by NGS.

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 Access Statement (Appendix A);
- Tree Survey (Appendix B); and

- 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

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

3.3 Assessment

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

- a) The impact on the character of the listed building as one of special architectural or historic importance is acceptable;
- b) the proposals have an adverse impact on the character or appearance of the conservation area;
- c) Impacts on equalities and rights are acceptable; and
- d) Public comments have been addressed.

a) Impact on character of listed building

The Historic Environment Scotland Policy Statement was revised in June 2016 (HESPS) and sets out the context within which proposals for alterations to listed building must be assessed. HESPS is an important material consideration in the determination of the application. Policy ENV 4 of the Local Development Plan reinforces this national policy position. This document states:

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

- a. the relative importance of the special interest of the building; and*
- b. the scale of the impact of the proposals on that special interest; and*
- c. whether there are other options which would ensure a continuing beneficial use for the building with less impact on its special interest; and*

- d. *whether there are significant benefits for economic growth or the wider community which justify a departure from the presumption set out in the statement.*

HESPS also states that buildings 'can be robbed of their special interest either by inappropriate alteration or by demolition'. There is, therefore, a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting.

The proposed alterations require to be assessed in terms of their impact on the Gallery as well as on the existing buildings on the site.

SOUTH-EAST CORNER (Ground Floor)

The stair which is to be removed is of some interest as an example of good quality work by the Property Services Agency carried out in 1978. The remainder of the alterations in this area such as the door to the stair from the store, the lift and the other partitions have no architectural interest. The existing door detracts from the significance of the interior because it is off centre with the main axis of the gallery. The design of the interior of the gallery depends on symmetry and axial relationships, and the current arrangement to have a door which is off centre is damaging to the whole sequence of galleries along the east side. The proposals would enhance this space by installing a door on this axis. A new door case should be in correct classical proportions of height to width and should match doors that are original to the gallery elsewhere. This detail will be requested as a condition to the consent.

The loss of the stair is considered to be necessary in order to radically improve the function of the galleries. In its existing arrangement the stair fails to attract visitors to the Scottish Collection. The impact on heritage would be minor but this is outweighed by the advantages of the alteration as part of an overall scheme to improve access to the galleries. An appropriate condition will ensure this area should be recorded with photographs.

GALLERIES 14-18 (First Floor to rear)

These galleries were built in 1972 and were redecorated with an additional dado rail to suggest the character of a French domestic interior in 1888. The proposed alterations will not impact on any original features and are considered acceptable within this context.

GALLERY 1 (First floor above entrance)

The galleries were altered in 1910-12 by W T Oldrieve. They are not original to the building. The galleries have been altered and the most significant parts of the galleries are the high quality stair which rises to them and the oculus over the entrance hall. The impact of the works will be mitigated by the design intentions which may include using paint finishes to match within these spaces. A relevant condition is attached to this consent and will require further details of paint finishes.

ENTRANCE HALL (Ground Floor)

Although the impact in terms of the way that visitors use and enjoy the Scottish National Gallery will be a major one, the impact on the special character or interest of the building is minor. The entrance hall will still have spaces to the east and west which are different to the original design but the recovery of the original design, with walls, would be entirely counter to the intention of the current project. The new design is more appropriate in conservation terms because it does not attempt to replicate the historical detail of the entrance hall. In this way, it will be much more legible where Oldrieve's entrance hall stops and new alterations begin. The junction between Oldrieve's work of 1911-12 and the proposed work will be obvious. The removal of the porch is acceptable. It is considered that the porch is disruptive to visitors to flow and is no longer required. However, the Playfair Project work particularly around the lift and stairs has some design intent that should be recorded in photographs before alteration. A copy of the design drawings for this element should be retained by Historic Environment Scotland archive. The porch will be kept in storage and so this removal is reversible.

EAST PRINCES STREET GARDENS ELEVATION

The existing bronze wall which would be demolished is of some architectural significance. It is a high quality design of the 1970s by the PSA. This work was controversial when it was first proposed but it is generally considered to be an aesthetic success. Its quiet design approach to the gardens has been a successful design approach within this setting. Whilst it is unfortunate to lose later work of high quality in a listed building, the loss of the bronze facade and the internal demolition and new works proposed are acceptable. The loss of the 1978 extension is therefore accepted. Appropriate conditions will ensure that elements of interest can be properly recorded.

The Gardens (Weston Link) Entrance, completed 2004, makes an entirely different architecture statement by giving the RSA a rusticated plinth in views from the east.

The Gardens Entrance is not significant in itself but it does form a new kind of integration between the National Gallery of Scotland building, the Royal Scottish Academy and Princes Street Gardens. This link has been established with a new entrance to Princes Street Gardens. The current scheme depends on this entrance as part of its design so there is design logic in continuing the stone band across the whole plinth-like form under both the RSA and the National Gallery of Scotland building.

Historic Environment Scotland does not object to this application or the corresponding planning application and supports the principle of the works.

The current application 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 setting. The grass banking will remain. The new proposals are predominately masonry in form and share the restrained approach of the existing PSA elevation. The new proposals present elements of solidity with 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. The intention to utilise tooled stonework rather than polished ashlar, add interest to this elevation and is an existing successful feature of the Weston Link's masonry.

The new works are more fully assessed under the associated planning application.

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. A condition is recommended to secure this sample panel.

The proposal complies with Policy ENV4 of the Edinburgh City Local Plan.

b) 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; and

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; and

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 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 of good quality. 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.

c) Equalities and Human Rights impacts

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.

d) Public Comments

Grounds of objection concern matters which are not relevant to the consideration of the listed building application. These matters are all considered within the assessment of the concurrent detailed planning application.

- design of replacement railings too plain and do not match existing;
- totem sign too large in scale;
- loss of grassed area; and
- scale of terracing detracts from designed landscaping.

Community Council Comments - No objections were received.

Conclusion

In conclusion, the proposals comply with the development plan and non-statutory guidance. They will not adversely affect the character of the listed building or its setting or the character and appearance of the conservation area. The case for the removal and alteration of the 1978 PSA extension is accepted. The proposals will help ensure the continued use of these significant listed buildings and represent a sympathetic intervention to the buildings. There are no other material considerations which outweigh this conclusion and subject to the addition of conditions to ensure the recording of removals, approval is recommended.

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

3.4 Conditions/reasons/informatives

Conditions:-

1. 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.

2. Details of the proposed paint colour scheme for the gallery interior shall be submitted to and approved in writing by the Planning Authority before work is commenced on site.
3. Access shall be allowed to the site, at any reasonable time in a period of at least three months from the date of this consent, for the purposes of recording the building, structure or any other item of interest.
4. Prior to the commencement of the approved works on site, sample panels, to be no less than 1.5m x 1.5m, shall be produced, demonstrating each proposed external material and accurately indicating the quality and consistency of future workmanship, and submitted for written approval by the Planning Authority.
5. 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.
6. Details of the new internal door to the south-east corner 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 safeguard the character of the statutorily listed building.
4. In order to enable the planning authority to consider this/these matter/s in detail.
5. In order to enable the planning authority to consider this/these matter/s in detail.
6. In order to enable the planning authority to consider this/these matter/s in detail.

Informatives

It should be noted that:

1. This consent is for listed building consent only. Work must not begin until other necessary consents, e.g. planning permission, have been obtained.
2. The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.

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:

The application has been assessed and has no impact in terms of equalities or human rights.

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.

One letter of representation was received from the Architectural Heritage Society of Scotland.

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

14 December 2017

Drawing numbers/Scheme

1-58,

Scheme 1

David R. Leslie

Chief Planning Officer

PLACE

The City of Edinburgh Council

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Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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 2 (Listed Buildings - Demolition) identifies the circumstances in which the demolition of listed buildings 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 Des 12 (Alterations and Extensions) sets criteria for assessing alterations and extensions to existing buildings.

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.

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.

Appendix 1

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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.

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 (southern) 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. (The more recent stair to the north is now being retained). 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 setting, (the grass banking remains) and, being on a different plane, also makes the different design approach proposed (from the distinctive 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 substantial plinth to the building above. The new proposals, being predominately masonry in form, will share this restrained approach, having an element of solidity with 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 utilise tooled stonework rather than polished ashlar, a successful feature of the Weston Link's masonry. 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.

Internally, besides the stairs, the opening up of the northern entrance area (current shop and meeting room) to provide a café may benefit from a further level of detail on the restoration of the space. Other alterations to access to the upper galleries have been discussed before.

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 in 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 revealed 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

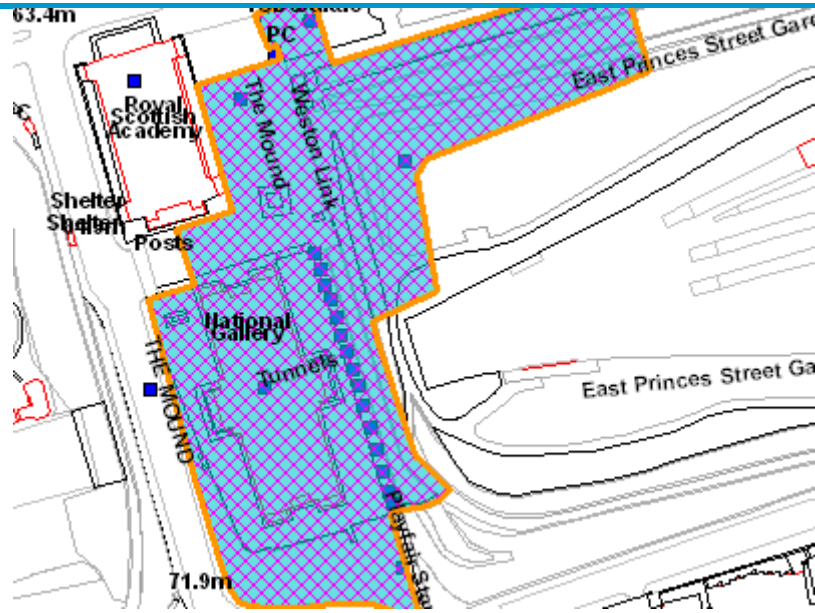
Given the potential importance of these remains it is essential that the excavations contain a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards) the scope of which will be agreed with CECAS.

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.

Location Plan



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