

Planning Committee

10.00am, Thursday 25 February 2016

Old and New Towns of Edinburgh World Heritage Site Update

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| Item number | 8.1 |
| Report number | |
| Executive/routine | |
| Wards | |

Executive Summary

This report provides an update on world heritage issues in the Old and New Towns of Edinburgh and an explanation of the roles and responsibilities of the different organisations involved in the management of the World Heritage Site.

Links

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| Coalition pledges | P40 |
| Council priorities | CO19 |
| Single Outcome Agreement | SO4 |

Old and New Towns of Edinburgh World Heritage Site Update

1. Recommendations

- 1.1 It is recommended that Committee notes the content of this report in the context of the hierarchy of roles and responsibilities of the parties involved in the management and protection of the World Heritage Site.

2. Background

Introduction

- 2.1 Committee considered a position statement on World Heritage issues at its meeting on 1 October 2015 and discussed the programme for the review of the Management plan for the Old and New Towns of Edinburgh World Heritage Site (the Site) at its meeting in December 2015.
- 2.2 The Site was added to the United Nations Educational, Scientific and Cultural Organisation's (UNESCO's) list of World Heritage Sites in 1995. The World Heritage Committee stated that the Edinburgh Old and New Towns "represented a remarkable blend of two urban phenomena: organic medieval growth and 18th century town planning".
- 2.3 It is approximately 4.5 square kilometres of the city centre. It takes in the Old Town Conservation Area and the New Town Conservation Area and includes parts of five others. It encompasses many institutions of national and civic significance including the Scottish Parliament, the courts, civic and cultural institutions and the University of Edinburgh. It has retained its historic urban form and character to a remarkable extent. It contains a wealth of buildings listed for their architectural character or historic interest, including the highest concentration of Category A listed buildings in Scotland.

State of Conservation

- 2.4 There has been recent media attention surrounding a number of proposed developments within the Site, raising its profile, and attracting the attention of ICOMOS-UK (the UK national committee of ICOMOS - the International Council on Monuments and Sites, which provides advice to UNESCO on changes to cultural world heritage sites).
- 2.5 ICOMOS-UK carried out an invited exploratory visit to the Old and New Towns of Edinburgh on 13-14 October 2015. Their findings have informed a letter from UNESCO (See Appendix 2) including an ICOMOS technical review, which, in turn, has been passed to the Council and Historic Environment Scotland (HES) - via DCMS (UK Government Department for Culture, Media and Sport) and Scottish Government (Culture and Heritage Directorate) - to assist with a response. This is a complex process, which is in place to ensure that sites inscribed on the World Heritage List are fulfilling their obligations to the World Heritage Convention.

3. Main report

Introduction

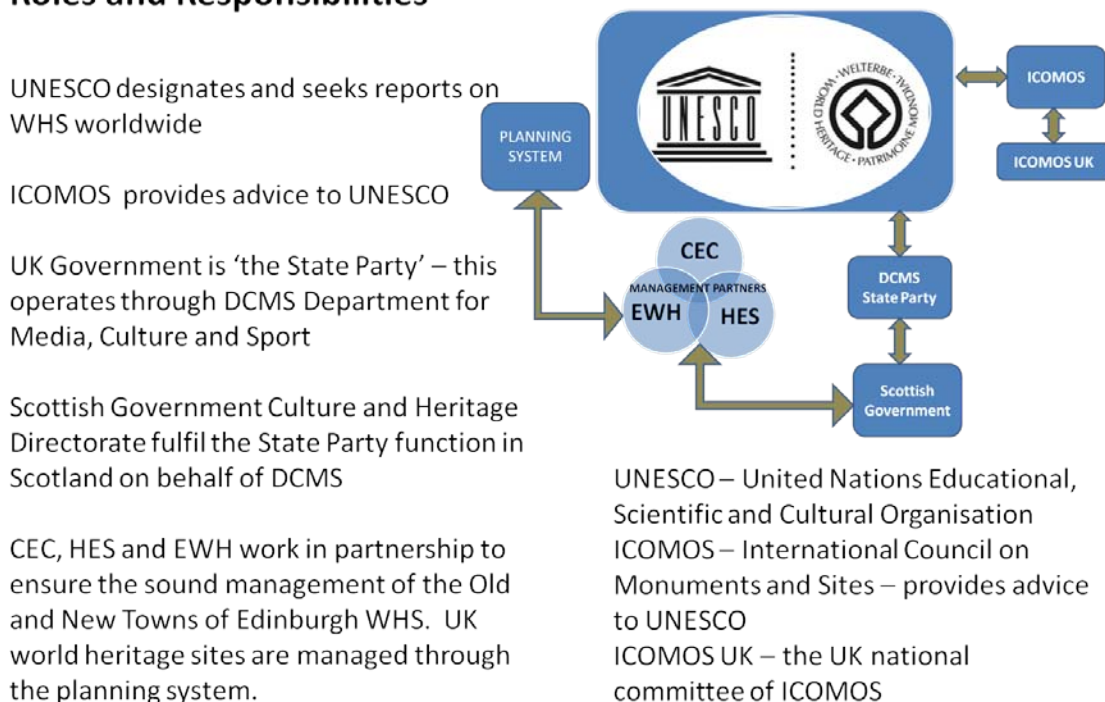
- 3.1 There are just over 1000 sites world-wide with WHS status, with 29 in the UK and 6 in Scotland (Edinburgh Old and New Towns, New Lanark, Heart of Neolithic Orkney, St Kilda, and the Forth Bridge). These are among the most globally significant sites, with outstanding universal value.
- 3.2 World Heritage Site status is the only international designation that protects built heritage. The UK is a signatory to the 1972 World Heritage Convention which aims to identify, protect, conserve, present and transmit to future generations cultural and natural heritage of Outstanding Universal Value (OUV).

Implementation of the World Heritage Convention

- 3.3 There are Operational Guidelines for the Implementation of the World Heritage Convention. These are updated regularly (most recently in 2015) to reflect the decisions of the World Heritage Centre. The aim of the guidance is to facilitate the implementation of the convention by setting out procedures for 'State Parties', the World Heritage Committee, Advisory Bodies to the Committee, and site managers, stakeholders and partners in the protection of World Heritage properties.

- 3.4 There is a complex structure involved in the management of World Heritage Sites, which is expressed below. The UK Government, as State Party, takes the lead in communicating with UNESCO on behalf of the Site and any formal correspondence from the 'managing partners' goes via Scottish Government and DCMS.

Roles and Responsibilities



Domestic Scrutiny

- 3.5 The Council jointly manages the Old and New Towns WHS in partnership with Edinburgh World Heritage (EWH) and HES. The partnership must demonstrate that it is fulfilling its obligation in meeting the requirements of the World Heritage Convention.
- 3.6 Scottish Planning Policy and Environmental Assessment regulations require planning authorities to take account of OUV both in their policies and decisions on cases. The Edinburgh Local Development Plan includes Policy Env 1 that serves to protect the OUV of the Site. HES is a statutory consultee in cases where there is potential to impact on OUV. EWH is a consultee, and engages with the planning process from the earliest stages through a Planning Protocol. This Protocol is currently being amended to include HES in its new roles since changing status to a non-departmental government agency. It is worth noting that, where HES objects to a planning application, and the Council is minded to grant consent, Scottish Ministers must be notified for them to determine if they wish to call-in the application for their decision.

International Scrutiny

- 3.7 Further to this, there is an international dimension to scrutiny. State Parties for WHSs are bound by the Operational Guidelines to monitor the State of Conservation of a Site. Any major restorations or constructions which may affect the OUV should be reported to UNESCO. This is known as Reactive Monitoring. The purpose of which is to allow the World Heritage Committee to assist in seeking appropriate solutions to ensure that OUV is fully preserved. UNESCO is often aware of high-profile cases from the media and third parties. The State Party primarily uses Reactive Monitoring as a means of reassuring UNESCO that there are checks and balances in place to ensure effective decision-making, but also to remind them of local timescales and process.
- 3.8 If UNESCO and its advisors ICOMOS are sufficiently concerned about actual or potential impacts on the OUV of the WHS, it will request a State Of Conservation Report from the State Party. This report is published on UNESCO's website. UNESCO's World Heritage Centre and ICOMOS review the document and use the information in the report to create present an agenda item and draft decision for UNESCO's World Heritage Committee's annual session, held each summer.
- 3.9 Decisions reached by the World Heritage Committee are published on UNESCO's website and normally include recommendations and requests for specific actions to remove the threat to the OUV of the WHS. UNESCO can also request that the State Party invites an Advisory Mission by ICOMOS. Following an Advisory Mission and submission of a further State of Conservation report in a subsequent year, if UNESCO takes the view that appropriate steps are not being taken to address its concerns, it may place the WHS on the World Heritage in Danger list. Following this step, UNESCO would request regular State of Conservation reports, probably on an annual basis until the situation had improved to enable the WHS to be taken back off the World Heritage in Danger list. The ultimate sanction is that UNESCO could eventually remove the WHS from the list of inscribed sites if its concerns remained unaddressed.
- 3.10 As UNESCO's World Heritage Committee meets once a year, its timescale for considering and responding to information provided by the State Party do not always accord with the timescales for decision-making within the UK planning system.

ICOMOS-UK exploratory visit

- 3.11 On 13 and 14 October 2015, ICOMOS-UK undertook a small 'exploratory visit' to Edinburgh with a view to assessing the impact of recent and pending planning decisions. ICOMOS-UK is an independent charitable organisation, linked to, but separate from, ICOMOS, which has a statutory remit for advising UNESCO on World Heritage matters. The group included Susan Denyer, Secretary and Director of ICOMOS-UK, Barry Joyce, retired planner and conservation officer, and James Simpson, Vice President of ICOMOS-UK (Scotland) and conservation architect.

- 3.12 ICOMOS-UK produced a summary report based on discussions held with elected members and officers from the Council, representatives of the other managing partners of the Site and representatives of amenity societies and local interest groups. The report acknowledged the timeliness of the discussions in respect of the forthcoming review of the World Heritage Site Management Plan, and emphasised that they would welcome further involvement in this process. Further recommendations from their visit touched on the production of design briefs, design quality, and the formation of a Conservation Community within the city.

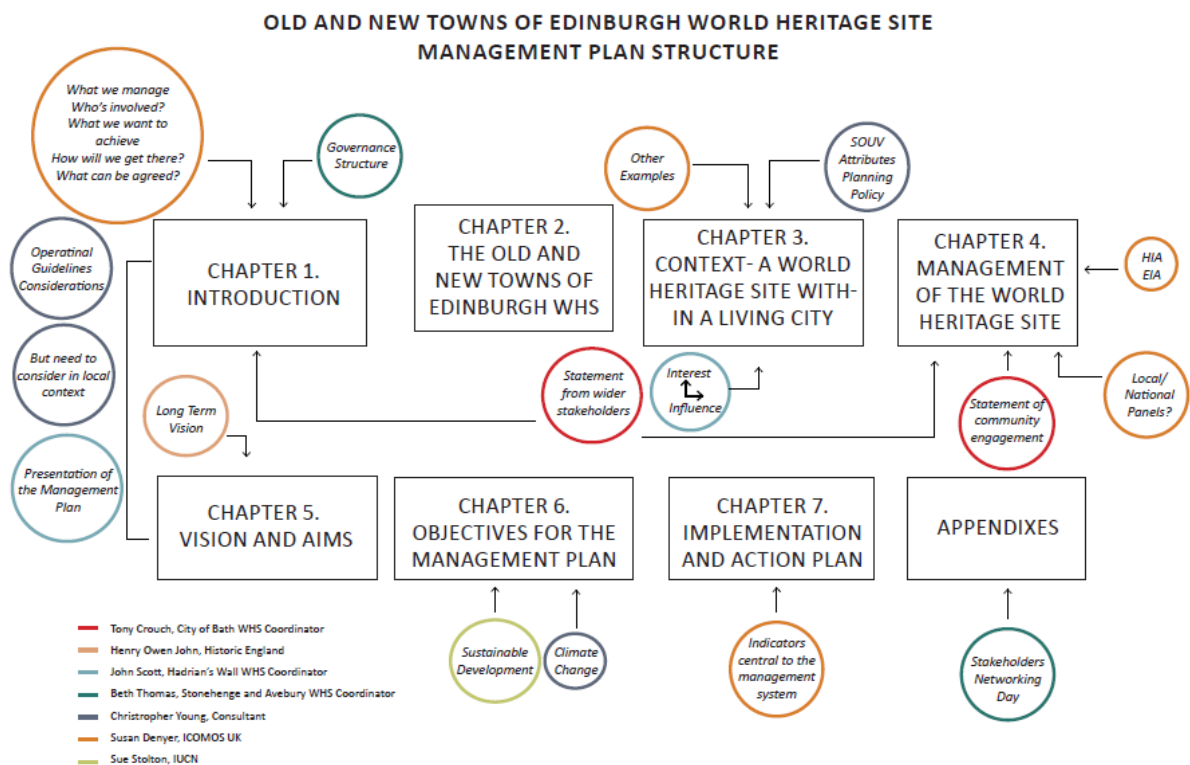
State of Conservation letter from UNESCO

- 3.13 UNESCO (Culture Sector, Division for Heritage) wrote to DCMS in December 2015, expressing concern over the State of Conservation of the Old and New Towns of Edinburgh World Heritage Site. DCMS in turn wrote to Scottish Government requesting a response. A collaborative response is being compiled by Scottish Government, based on technical information provided by the Council and HES.
- 3.14 The UNESCO letter raises concern over the impact on major buildings and visual integrity, citing specific cases (including the former Royal High School), and concerns over governance.
- 3.15 The information requested by the Scottish Government includes details of planning applications, policy context and progress on the review of the Management Plan. Officers have supplied this to the Scottish Government in order that the final response can be prepared by DCMS. The UNESCO letter also commented on other urban world heritage sites in the UK and offered to assist in confronting the challenges of managing sustainable change in this context.

Management Plan Review

- 3.16 The current Management Plan review is embracing the opportunity presented in addressing some of the issues/challenges facing the management of the Site. It is intended to capture the 'Historic Urban Landscape' approach to management of the Site in the new plan. Opportunities for engagement have been established with ICOMOS/ ICOMOS-UK and it is intended to seek input from UNESCO's World Heritage Centre.
- 3.17 Historic Environment Scotland hosted the recent 'World Heritage: UK' technical workshop on 'WHS Management Plans and Systems'. This organisation focuses on networking, advocacy and promotion of WHSs, of which the Council is a member, and the workshop was timely. The opportunity was taken to present where the Old and New Towns WHS Steering Group is in the review process, and to seek feedback on two key management issues: 'development pressure' and 'maintaining a living city'. The opportunity has also been taken to feed good practice from other Sites, and thoughts from ICOMOS and IUCN (International Union for Conservation of Nature), which were present at the meeting, on good practice and management effectiveness, into the structure of the emerging draft management plan.

- 3.18 The conceptual diagram, below, is a working model based on good practice identified from the workshop participants and how these could be incorporated in the revised management plan:



- 3.19 The Management Plan review is on-going; it will include local, national and international stakeholder engagement and a draft for consultation will be presented to Planning Committee in summer 2016 with a view to launching the revised Management Plan on World Heritage Day, 18 April, 2017.

4. Measures of success

- 4.1 The protection of the Outstanding Universal Value of the World Heritage Site from the adverse impact of development by understanding the roles and responsibilities of partner organisations and the mechanism for domestic and international scrutiny.

5. Financial impact

- 5.1 There are no financial implications associated with this report.

6. Risk, policy, compliance and governance impact

- 6.1 There are no significant risks associated with approval of the report as recommended.

7. Equalities impact

- 7.1 The aim of managing the World Heritage Site is to preserve and enhance the quality of the area. This has the potential to improve the quality of life and supports sustainable communities. There are no predicted negative impacts on equalities.

8. Sustainability impact

- 8.1 Management of the built environment has the potential to minimise the use of natural resources and reduce carbon emissions. The management of the historic environment contributes directly to sustainability in a number of ways. These include the unique quality of historic environments which provide a sense of identity and continuity.

9. Consultation and engagement

- 9.1 None.

10. Background reading/external references

- 10.1 [The Old and New Towns of Edinburgh World Heritage Site Management Plan 2011-2016](#)
- 10.2 [Old and New Towns of Edinburgh World Heritage Site Update, 1 October 2015](#)
- 10.3 [Old and New Towns of Edinburgh World Heritage Site Monitoring Report 2013-15, 1 December 2015](#)

Paul Lawrence

Executive Director - Place

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11. Links

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| Coalition pledges | P40 – Work with Edinburgh World Heritage Trust and other stakeholders to conserve the city’s built heritage. |
| Council priorities | CO19 – Attractive Places and Well Maintained – Edinburgh remains an attractive city through the development of high quality buildings and places and the delivery of high standards and maintenance of infrastructure and public realm |
| Single Outcome Agreement | SO4 – Edinburgh’s communities are safer and have improved physical and social fabric. |
| Appendices | Appendix 1 Summary of the components of the Site’s OUV Appendix 2 Letter from UNESCO, 18 December 2015 |

APPENDIX 1

Outstanding Universal Value

Brief synthesis

The remarkable juxtaposition of two clearly articulated urban planning phenomena. The contrast between the organic medieval Old Town and the planned Georgian New Town of Edinburgh, Scotland, provides a clarity of urban structure unrivalled in Europe. The juxtaposition of these two distinctive townscapes, 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 Old Town stretches along a high ridge from the Castle on its dramatically situated rock down to the Palace of Holyrood. Its form reflects the burgh plots of the Canongate, founded as an "abbatial burgh" dependent on the Abbey of Holyrood, and the national tradition of building tall on the narrow "tofts" or plots separated by lanes or "closes" which created some of the world's tallest buildings of their age, the dramatic, robust, and distinctive tenement buildings. It contains many 16th and 17th century merchants' and nobles' houses such as the early 17th century restored mansion house of Gladstone's Land which rises to six storeys, and important early public buildings such as the Canongate Tolbooth and St Giles Cathedral.

The Old Town is characterized by the survival of the little-altered medieval "fishbone" street pattern of narrow closes, wynds, and courts leading off the spine formed by the High Street, the broadest, longest street in the Old Town, with a sense of enclosed space derived from its width, the height of the buildings lining it, and the small scale of any breaks between them.

The New Town, constructed between 1767 and 1890 as a collection of seven new towns on the glacial plain to the north of the Old 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 (1728-92), Sir William Chambers (1723-96), and William Playfair (1790-1857). 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 of 3,288 ha, is consistent to an unrivalled degree, and survives virtually intact.

Some of the finest public and commercial monuments of the New-classical revival in Europe survive in the city, reflecting its continuing status as the capital of Scotland since 1437, and a major centre of thought and learning in the 18th century Age of Enlightenment, with its close cultural and political links with mainland Europe.

Page 9

The successive planned extensions from the first New Town, and the high quality of the architecture, set standards for Scotland and beyond, and exerted a major influence on the development of urban architecture and town planning throughout Europe.

The dramatic topography of the Old Town combined with the planned alignments of key buildings in both the Old and the New Town, results in spectacular views and panoramas and an iconic skyline.

The renewal and revival of the Old Town in the late 19th century, and the adaptation of the distinctive Baronial style of building for use in an urban environment, influenced the development of conservation policies for urban environments.

Criterion (ii): The successive planned extensions of the New Town, and the high quality of its architecture, set standards for Scotland and beyond, and exerted a major influence on the development of urban architecture and town planning throughout Europe, in the 18th and 19th centuries.

Criterion (iv): The Old and New Towns together form a dramatic reflection of significant changes in European urban planning, from the inward looking, defensive walled medieval city of royal palaces, abbeys and organically developed burgage plots in the Old Town, through the expansive formal Enlightenment planning of the 18th and 19th centuries in the New Town, to the 19th century rediscovery and revival of the Old Town with its adaptation of a distinctive Baronial style of architecture in an urban setting.

Integrity

The property encompasses significant town-planning components, including layout, buildings, open spaces and views, that demonstrate the distinctiveness between the organic growth of the Old Town and the planned terraces and squares of the New Town with the wide landscaped valley between. Overall the property forms a remarkably consistent and coherent entity which has developed and adapted over time. It has largely preserved its skyline and extensive views in and out of the property, although as with any modern, living city these have altered and developed over time, while preserving the key attributes of Outstanding Universal Value within the property. The vulnerability of the skyline and the views in and out of the property has been addressed by the introduction of a Skyline Policy.

Authenticity

The level of authenticity in Edinburgh is high. Individually the high-quality buildings of all dates have been conserved to a high standard and the layout of streets and squares maintain their intactness. The property also continues to retain its historic role as the administrative and cultural capital of Scotland, while remaining a vibrant economic centre.

APPENDIX 2

Letter from UNESCO, 18 December 2015



Culture Sector
Division for Heritage

United Nations
Educational, Scientific and
Cultural Organization

Organisation
des Nations Unies
pour l'éducation,
la science et la culture

Organización
de las Naciones Unidas
para la Educación,
la Ciencia y la Cultura

Организация
Объединенных Наций по
вопросам образования,
науки и культуры

منظمة الأمم المتحدة
للتربية والعلم والثقافة

联合国教育、
科学及文化组织

Ms Hannah Jones
Department for Culture, Media and
Sport
Heritage Team
100 Parliament Street
SW1A 2BQ London
United Kingdom

Ref.: CLT/WHC/8485/GB/MNT/

18 December 2015

Subject: State of conservation of the World Heritage property “Old and New Towns of Edinburgh”, United Kingdom of Great Britain and Northern Ireland

Madam,

Following the information you sent us in accordance with paragraph 172 regarding multiple development projects that are likely to affect the Outstanding Universal Value of the World Heritage property “Old and New Towns of Edinburgh” (inscribed on the World Heritage List in 1995), I am pleased to transmit to you ICOMOS’s technical review (Annex I).

I also take this opportunity to thank you for complying with Paragraph 172 of the *Operational Guidelines* by which the World Heritage Committee invites the States Parties to the Convention to inform it, through the World Heritage Centre, of their intention to undertake or authorize in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property, as soon as possible and before making any decisions.

The major points highlighted by ICOMOS concern:

Impact on major buildings: For example, the Royal High School, which is “one of the truly exceptional historic buildings within the WH property” and which “makes a fundamental contribution to the Outstanding Universal Value of the WH property” is threatened by development proposals which are unsympathetic with conserving the integrity of the building and its setting and which plan for inappropriate levels of intervention.

Impact on visual integrity: Elements of the property are confronting negative impacts, through specific development projects which would affect edifices, significant architectural features, consistency of style and scale, etc.

Governance: The general development vision for the city at the local and national level lacks an integration of heritage values, and the process is weak as a result. At the level of local planning consent, development projects are being approved without due consideration of heritage values and conservation,

including a lack of Heritage Impact Assessments, resulting in the abovementioned negative impacts.

In summary, the review states that “in combination both existing projects and the development consent process pose a significant threat to the visual quality, integrity and juxtaposition of planning approaches that underpin the Outstanding Universal Value of the property.”

Therefore, I would like to express the World Heritage Centre’s strong concern about the current state of urban conservation in Edinburgh in general, due to the Royal High School project and other projects related to urban development within the boundaries of the World Heritage property, its buffer zone, and the surrounding area as described further in the attached technical review (Annex 1). The quantity and pervasiveness of development projects that are being pursued without due consideration for conservation of the property is deeply worrying. To address these threats to the OUV of the property, a State of Conservation report may need to be presented to the 40th session of the World Heritage Committee.

I would be grateful if your relevant authorities could, at their earliest convenience, address the concerns and recommendations expressed in this letter and the attached technical review. Kindly provide the World Heritage Centre with information on the necessary measures to mitigate the impact of inappropriate developments that will be taken to protect the Outstanding Universal Value of the World Heritage property “Old and New Towns of Edinburgh” in light of the attached review (Annex 1).

Taking a proactive approach to urban development issues and managing sustainable change is a challenge that must be confronted. I encourage you to leverage tools such as prevention strategies, capacity building, and awareness raising at the local authority level to this end. Major World Heritage and urban heritage conservation concerns in areas such as Edinburgh, London, Liverpool and Cornwall, due to insufficient urban conservation integration in urban development planning, indicates a greater need for a global holistic vision for city development in the United Kingdom of Great Britain and Northern Ireland. The World Heritage Centre would be pleased to work together with you to provide assistance in developing such a vision and in considering applying the Historic Urban Landscape approach.

I thank you for your co-operation and for your support in the implementation of the *World Heritage Convention*.

Please accept, Madame, the assurances of my highest consideration.



Mechtild Rössler
Director
World Heritage Centre

cc: United Kingdom National Commission for UNESCO
National Focal Points for World Heritage ICOMOS / ICCROM

ICOMOS Technical Review

| | |
|---------------------------------|---|
| Property: | Old and New Towns of Edinburgh |
| State Party: | United Kingdom of Great Britain and Northern Ireland |
| Property ID: | 728 |
| Date inscription: | 1995 |
| Criteria: | (ii) (iv) |
| Issues under evaluation: | Impact of inappropriate developments Threats posed to OUV by planning consent regime |

Background

The approved Statement of Outstanding Universal Value sets out that:

The Old and News Towns of Edinburgh present and contrast two approaches to urban design: the organic medieval Old Town and the planned Georgian New Town. The Old Town stretches along a high ridge from Edinburgh Castle, on its dramatically situated rock, down to the Palace of Holyrood and is characterized by the medieval street pattern of narrow closes, wynds, and courts leading off the High Street spine. By contrast, the New Town, constructed between 1767 and 1890 features structured neo-classical precincts and a network of open spaces. The Old and News Towns of Edinburgh include some of the finest public buildings and monuments from the New-classical revival in Europe, reflecting the city's importance as the capital of Scotland for more than 500 years and its former role as an intellectual hub, as well as the ideas and ideals of the Enlightenment, a period in the 18th century when Edinburgh was the cultural leader of Europe.

The 'Old and News Towns of Edinburgh' property was included on the World Heritage List in 1995, under criteria ii and iv:

Criterion (ii): *The successive planned extensions of the New Town, and the high quality of its architecture, set standards for Scotland and beyond, and exerted a major influence on the development of urban architecture and town planning throughout Europe, in the 18th and 19th centuries.*

Criterion (iv): *The Old and New Towns together form a dramatic reflection of significant changes in European urban planning, from the inward looking, defensive walled medieval city of royal palaces, abbeys and organically developed burgh plots in the Old Town, through the expansive formal Enlightenment planning of the 18th and 19th centuries in the New Town, to the 19th century rediscovery and revival of the Old Town with its adaptation of a distinctive Baronial style of architecture in an urban setting.*

Recent Projects

Recent approval for construction of substantial, overtly modern buildings and the increasing potential impact of further redevelopment, including proposals for the highly-prominent Royal High School on Calton Hill, have highlighted both actual impacts on the integrity and visual quality of the World Heritage property and the ongoing threat posed by the local development approval processes.

These ICOMOS technical review comments have been informed by documents in public domain, including *The Old and New Towns of Edinburgh World Heritage Site Management Plan 2011-2016*, media reports (both supportive and critical of new developments in Edinburgh), published documents relating to the Ribbon Hotel development (part of St James Quarter) and Royal High School projects, information provided to the World Heritage Centre by the UK Department for Culture, Media & Sport, a letter of objection to the Royal High School planning application prepared by UK ICOMOS and a separate UK ICOMOS report prepared following an invited exploratory visit to Edinburgh on 13 and 14 October 2015.

The Heritage Team at the UK Department for Culture, Media & Sport has identified seven major development proposals within the Property, some already under construction, some approved and some still pending:

- Royal High School – Planning Application Notice lodged for a new luxury hotel, resulting from adaptation of this iconic building, and construction of new built elements ; pending
- Caltongate Development Site – proposed major mixed-use development; including, hotel, commercial, community and leisure use; approved and under construction
- Former Donaldson's School, West Coates – residential conversion of 'A' listed building;
- St James Quarter – major mixed-use development, for which outline planning permission is already in place; approved
- Top Shop, Former Forsyth's building, Princes Street – unauthorised removal of significant architectural feature ('gold-leafed globe');
- 42 St Andrew Square & West Register Street – current applications for major city developments;
- 1-6 India Buildings, 11-15 Victoria Street, 18-20 Cowgate – mixed-use development subject to a current Planning Application Notice.

There are also a range of other current projects and proposals within the buffer zone and in the vicinity of the WH property. Media reports suggest that there could be hundreds of applications considered over coming years. Recent media attention and submissions to the World Heritage Centre have particularly focused on the approved Ribbon Hotel and proposals for the Royal High School.

The Ribbon Hotel project in St James, which was approved August 2015, features an unusual, visually-striking, curved and articulated metal facade which has a scale and appearance that is not consistent with the surrounding built form. If and when constructed, the Ribbon Hotel will be an intrusive element which will adversely impact on the visual integrity of the WH property.

The former Royal High School, which closed in 1968, is one of the truly exceptional historic buildings within the WH property. The original World Heritage nomination dossier recognised it as the 'noblest monument of the Scottish Revival: and perhaps the single building which most justified Edinburgh's epithet Athens of the North'. It is no exaggeration to conclude that this element makes a fundamental contribution to the Outstanding Universal Value of the WH property. Owned by the City of Edinburgh Council, the Royal High School has been subject to future use considerations and an expression of interest process for some years. The current proposals represent a level of intervention to both buildings and setting that would be inconsistent with the architectural majesty of the original design conception and which would therefore have a substantive adverse impact on the Outstanding Universal Value of the WH property.

Analysis

Current concerns about new development, both approved and proposed, within the WH property highlight two different, but related, issues:

- the actual adverse impact on Outstanding Universal Value of specific developments, including approved projects and proposed projects; and
- a broader ongoing threat to Outstanding Universal Value – particularly to integrity and authenticity – posed by the local planning consent process. This threat arises in part from ‘development’ rather than ‘values’ being the apparent principal driver of change and in part from an apparent inability or reluctance of national heritage agencies to intervene and overturn local decisions, once outline planning permission has been granted.
- The apparent lack of Heritage Impact Assessments for major projects.

In combination both existing projects and the development consent process pose a significant threat to the visual quality, integrity and juxtaposition of planning approaches that underpin the Outstanding Universal Value of the property.

The City of Edinburgh requires ongoing economic activity, including appropriate conservation, adaptation and new development to continue as a viable and vibrant community. Individual assets, including elements of exceptional heritage value, such as the Royal High School, themselves need to be used to provide an economic base for their own conservation. However, such changes should also respond to the special qualities and heritage values of the place; importantly, new works and activities should enhance, rather than detract from, the integrity, authenticity and Outstanding Universal Value of the WH property.

Regrettably the current situation, including both approved and proposed developments, appears to have tipped the balance inappropriately, away from conservation, towards inappropriate development. There is therefore an urgent need to reconsider, revise and re-frame current approaches to development, including conservation and adaptation of existing structures and construction of new structures, so as to deliver greater focus on values, to incorporate appropriate expertise and to improve engagement with the community.

ICOMOS Recommendations

It is therefore recommended that:

1. On the basis of the information received, ICOMOS considers that the current proposals for the Old Royal High School would have a major and negative impact on the Outstanding Universal Value of the WH property and should not be approved.
2. Conservation of Outstanding Universal Value should be formally recognised as the primary objective in the development consent process for projects within the Old and News Towns of Edinburgh World Heritage property. A ‘values-based’ approach should be adopted.
3. Current planning and approval paradigms should be revised. In particular, within the WH property itself, consideration should be given to removal of ‘Outline Planning Permission’ for major projects, so that the full implications of development proposals may be properly understood at the time when consent is first considered. Planning instruments, statutes and guidelines should be amended accordingly.
4. The design process should be improved through more active involvement of the existing Edinburgh Urban Design Panel – plus greater engagement with other contributors, including

particularly the Edinburgh World Heritage Trust, Architecture and Design Scotland, Historic Environment Scotland and ICOMOS – United Kingdom.

5. *The Old and New Towns of Edinburgh World Heritage Site Management Plan 2011-2016* should be revised and updated accordingly.

ICOMOS

November 2015