# **Development Management Sub Committee**

## Wednesday 4 March 2020

Application for Listed Building Consent 19/04118/LBC at Forth Rail Bridge, Hawes Brae, South Queensferry Installation of bridge access system on Forth Bridge and installation of glazed capping to Dalmeny Battery.

Item number

Report number

Wards B01 - Almond

## Summary

The development complies with the Planning (Listed Building and Conservation Areas) Scotland Act 1997 as it preserves the setting and integrity of the listed building.

The proposed alterations to the listed buildings are small in scale and sensitively designed and as such would protect the key characteristics of the listed buildings. The proposal will preserve and enhance the special character and appearance of the conservation area and is consistent with the Queensferry conservation area character appraisal. The proposal satisfies the objectives of Local Development Plan policy Env 6. The proposed interventions on the Forth Bridge demonstrates a high standard of design and utilises material appropriate to the historic environment.

#### Links

Policies and guidance for this application

LDPP, LEN01, LEN04, LEN06, LEN08, LEN09, NSG, NSGD02, NSLBCA,

## Report

Application for Listed Building Consent 19/04118/LBC at Forth Rail Bridge, Hawes Brae, South Queensferry Installation of bridge access system on Forth Bridge and installation of glazed capping to Dalmeny Battery.

#### Recommendations

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

## **Background**

#### 2.1 Site description

The site is located to the eastern side of South Queensferry and to the north of Dalmeny Station.

The application site includes the Forth Bridge as far as the top of the first cantilever in the north, the former Network Rail depot site at the southern end of the Forth Bridge, there is an existing access road from Hawes Brae in the west serving the Forts residential property, and existing pedestrian accesses from Dalmeny Station and Hawes Brae (known as Jacob's Ladder). The area under the bridge was formerly in industrial use. It now comprises hard standing as maintenance for the bridge, with a secure fence. Electricity sub stations sit at the foot of the bridge piers.

The Forth Bridge is a statutory category A listed building completed in 1890. It was listed on 18 June 1973, ref LB40370. The description includes the following;

"Three giant cross-braced, steel tower structures. Each tower counterbalances two arms on either side to provide two full cantilevered spans (each being 521 metres long with a 107 metre suspended span truss to centre) and two half outer spans. Each tower structure is set on four circular - plan granite and concrete piers. Piers to South on seabed, central piers on shelf of rock beside Inchgarvie (Dalmeny Parish); piers to north on promontory at North Queensferry.

Superstructure flanked by approach viaducts supported (45 meters above water level) by tapering, rectangular-plan masonry piers. Five piers to north with three masonry arches adjoining promontory at North Queensferry; ten piers to south with four masonry arches adjoining promontory at South Queensferry. Trains pass through round-arch masonry portals at innermost piers, marking start of cantilever superstructure."

The list entry for the Forth Bridge includes a Statement of Special Interest. The following excerpt summarises the significance of the structure:

The internationally acclaimed Forth (Railway) Bridge is one of the most ambitious and successful engineering achievements of the 19th century. On completion it achieved the longest bridge spans in the world and was the largest steel structure, pioneering the widespread adoption of steel bridge construction. With its distinctive cantilevered design, the Forth Bridge is Scotland's most instantly recognisable industrial landmark. It has become a symbol of national identity in much the same way as the Eiffel Tower in Paris.

UNESCO inscribed the Forth Bridge as a World Heritage Site on 5 July 2015. It has a statement of Outstanding Universal Value and a Management Plan.

The application site is accessed off Hawes Brae (B924) and incorporates Fort House, currently a residential dwelling. The Dalmeny Battery is a category A gun emplacements set within the curtilage of Fort House.

Dalmeny Battery is a coastal defence battery, dating to around 1903. It formed part of the inner of three defensive lines of coast batteries established between 1900 and 1916 to defend the eastern approaches into the Forth. It was operational during the First World War.

The Dalmeny Battery was listed as Category A on 9 May 2018, LB52469. The description includes the following;

The battery comprises two Quick Fire 4.7 inch gun emplacements, an underground magazine, and an observation post. The gun emplacements are built of reinforced concrete, with locker recesses in circular holdfasts, and semi-circular aprons to the north. Access stairs between the emplacements lead to a sunken brick-lined rectangular light well courtyard flanked with magazines, shell and cartridge stores. The interiors of the magazines and store rooms were seen in 2017. The walls are painted brick throughout. The stores are barrel-vaulted with ventilation recesses.

The listing excludes the engine house, oil store and caretaker's quarters to the east and boundary railings.

The Statement of Special Interest includes the following:

"The twin gun battery at Dalmeny, South Queensferry, is an outstanding survival of pre-First World War coastal defences in Scotland. Operational from around 1903, it was an early and important part of an inner line of defence across the Firth of Forth that played an important part of an inner line of defence across the Firth of Forth that played an important role in defending the waters of the Forth and the key naval base at Rosyth from the threat of attach by sea by fast moving enemy vessels during the First World War. Little altered since 1917, Dalmeny Battery retains significant potential to add to our knowledge and understanding of wartime military technology and strategy in the context of the coastal defence of eastern Scotland during the First World War.

The survival of these monumental concrete structures provides a tangible and powerful reminder of one of the defining events of the 20th century."

This application site is located within the Queensferry Conservation Area.

#### 2.2 Site History

28 July 2011 - An Application for Listed Building Consent. The proposals involve permanent access solution for Forth Bridge to replace existing temporary access. Proposals will include a permanent access at Hawes Brae abutment from ground up onto bridge lower walkway and at the Jubilee Tower, a stair and walkway from the lower walkway up to track level, at Forth Rail Bridge, Hawes Brae, South Queensferry, (application reference 11/01747/LBC).

27 July 2015 - An Application for Listed Building Consent. The proposals are to retain the works for the removal of existing signals and installation of new signals and location box, (application reference 15/02916/LBC).

3 June 2019 - A Proposal of Application Notice for "Proposed development of reception centre and bridge access system with associated car parking, landscaping and servicing and alterations to existing pedestrian and vehicular access", at the Forts, 3 Hawes Brae, South Queensferry, (application reference 19/02357/PAN).

#### Parallel Applications

29 August 2019 - An application for Conservation Area Consent to Demolish 2x ancillary buildings of residential property to make way for proposed development of Forth Bridge Experience' at Forth Rail Bridge, Hawes Brae, South Queensferry, (application reference 19/04117/CON).

29 August 2019 - An application for Full Planning Permission for Development of a Forth Bridge Walk Reception Centre; new sections of bridge access system, new viewing platforms, associated car parking, landscaping; servicing and alterations to existing vehicular and pedestrian accesses at Forth Rail Bridge, Hawes Brae, South Queensferry, (application reference 19/04116/FUL).

## Main report

#### 3.1 Description of the Proposal

The application is for listed building consent for the installation of a bridge access system on the Forth Bridge and the installation of glazed capping to Dalmeny Battery, both are category A listed buildings.

This listed building application is considered in relation to the parallel planning application reference 19/04116/FUL which is for the development of a Forth Bridge Walk Experience with Reception Centre.

#### Forth Bridge Access System/Bridge Walk

Access to the bridge walk begins in the existing site compound which will be developed out as the reception Hub.

There is currently an existing maintenance access stair to the Forth Bridge from the compound. It runs up the north side of the granite pillar within the application site. A replacement access stair is proposed linking a new reception Hub building onto the existing bridge gantry. An escape stair is proposed at this point which would be developed with a metal balustrade and metal grated deck. At ground level a perforated corten screen would link the design of the staircase to the proposed hub building.

A clip wire system is proposed running along the gantry and some minor modifications will be made within the internal walkway to secure this.

To connect visitors from the gantry up onto the bridge access track, a new staircase is proposed up the eastern side of the Jubilee Tower. This is of similar design to the existing staircases on the bridge and would be grey painted metal to ensure consistency. This would be a cantilevered structure with four landing points proposed.

Six over bridge accesses are proposed over key cross member structures of the bridge. These require hook like structures which would protrude approximately 1.5 metres above the existing cross members of the bridge and would be set inside the bridge profile.

Two new viewing platforms will be provided at either side of the top of the southern steel tower to allow clear views across the River Forth north and south. The platform would measure approximately 7 metres by 6 metres with a railing of 1.5 metres high. Visitors will walk up the eastern side of the bridge and down the western side, descending back at Jubilee Pier. A staff/ emergency access is included from the platforms. Detailed plans are included which show how the alterations would be undertaken, this includes details such as links into the existing rivets following the engineering design details of the existing bridge.

#### Dalmeny Battery

The Dalmeny Battery within the ground of the Forts is a category A listed building. The proposal is to leave the battery entirely in-situ and amalgamate it as a key part of the landscape proposals for the Reception Hub Building. In order to make the structure safe for visitors it is proposed to replace the existing wire mesh that is over the open sections of the structure with a glazed capping. It is also proposed to include interpretive signs for information purposes.

The application is supported by the following documents which are available to view on the Planning and Building Standards Online system:

- Planning Supporting Statement;
- Heritage Statement;
- Design and Access Statement; and
- Landscape and Visual Impact Assessment.

#### 3.2 Determining Issues

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

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

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

#### 3.3 Assessment

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

- a) the proposals preserve the character of the listed building;
- b) the proposals preserve or enhance the character and appearance of the conservation area and
- c) public comments have been addressed.

#### a) Character of Listed Building

#### Impact of the proposed development upon the character of the Forth Bridge

The proposed development is a commercial venture which will encourage people to interact with the Forth Bridge Listed Structure, not dissimilar to the likes of the Eiffel Tower in Paris or Tower Bridge in London, both listed structures and UNESCO World Heritage Sites. The development proposes minimal intervention on the listed structure which are of design and colour that respects the original structure.

The Forth Bridge is of a phenomenal scale and at any one time may have around 80 people working on its structure, in addition to trains crossing. The impact of a group of tourists (max 20 at a time) climbing up the southern span is not considered to be visually detrimental to its character. For the most part the visitors will be unseen within the complexity of steel spans.

The proposed hooks interventions on the cantilevers and the introduction of platforms to accommodate the tourists are considered small in scale. The proposed design and colour pallet will ensure that these interventions will be lost against the scale of the bridge trusses. The development will not interfere with iconic cantilevered steel spans which define the character of the Forth Bridge.

The new staircase proposed up the east side of the Jubilee Tower provides an extension from the existing staircase and by using the same materials and subtle approach it will be read against the granite pier will not impact upon the appearance of the listed building. The interventions proposed are reversible should the visitor experience lose appeal. It is considered that they will not be visually detrimental, and the industrial landmark character of the bridge will be retained.

The proposed replacement steel access stair from the compound is an upgrade to the existing maintenance stair and will be visually lost beside the bulk of the granite pier, under the bridge gantry.

The key characteristics of the bridge may be defined as the three giant cross-braced, steel tower structures, each at over 500m in length. The application is supported by a LVIA which concludes that the proposal will not have a detrimental visual impact upon the character of the Forth Bridge.

The proposed external alterations to the Forth Rail Bridge will have no significant impact on the overall architectural composition, the alterations can be carried out without serious detriment to its character.

#### **Dalmeny Battery**

The proposed upgrading of the Dalmeny Battery is appropriate and it is considered that the glazing to the light well will enhance the heritage experience, allowing access to the structure, protecting its interior. The proposed hard and soft landscaping works will upgrade the setting of this historic structure, which is currently hidden in a domestic garden.

The layout of the visitor proposal and the associated car parking and hard landscaping proposals will protect and enhance the character of the Dalmeny Battery bringing this heritage element of the site back into the public domain. The military characteristics of these monumental concrete structures will be protected by the development.

The proposed alterations to the listed buildings are small in scale and sensitively designed and as such would protect the key characteristics of the listed buildings. The proposal will preserve and enhance the special character and appearance of the conservation area and is consistent with the Queensferry conservation area character appraisal. The proposal satisfies the objectives of Local Development Plan policy Env 6 which encourages development of a high standard of design which preserves and enhances the character and appearance of the conservation area. The proposed interventions on the Forth Bridge demonstrates a high standard of design and utilises material appropriate to the historic environment.

Historic Environment Scotland have raised no objection to the proposal.

It is concluded that the proposals will not have a significant adverse impact either upon the physical historic fabric of the bridge nor upon its setting or character. With regards to the Dalmeny Battery it is concluded that the glazed capping will not have a significant impact upon either the character of the structure nor upon its fabric, however full details of the fixings for the glazing are yet to be submitted and an appropriate condition is recommended to ensure a quality finish.

# b) The proposal will preserve the character and appearance of the Queensferry Conservation Area

The Queensferry Conservation Area Character Appraisal emphasises the importance of the medieval core, the settlement pattern of stone built houses with their lang riggs, and the strong Scots vernacular character of the architecture.

The Queensferry Conservation Area Character Appraisal identifies that;

Visitors are a major factor in the town's activity, drawn by views of the bridges and access to the water.

The conservation area as a whole is bounded by twentieth century residential areas to the south and west and by the Forth Road Bridge and Port Edgar to the west

The Forth Bridge and Forth Road Bridge are the outstanding landmarks, dominating the town and the wider area with their sheer scale and presence. However, the bridges are often hidden from view within the enclosure of the High Street, allowing local landmarks to become more evident. These include the Tollbooth steeple, the Seals Craig Hotel and the spire of the parish church, viewed on the skyline from the north

Having regard to the various tourist activities and attractions in this historic area it is considered that the development of a visitor experience to promote the education and enjoyment of the industrial heritage of the Forth Rail Bridge is acceptable in principle within the conservation area. A detailed assessment is set out in the parallel planning application reference 19/04116/FUL.

The inherent features of Queensferry are derived from its topography and its historical use as a point to cross the River Forth. The proposal will allow tourists to experience that topography from the bridge crossing, views over the Forth and Queensferry village will be enjoyed sensitively with minimal intervention onto the listed structure.

The proposal will unfence the compounded area under the west side of the bridge and will release the historic Dalmeny Battery emplacements from a private garden, bringing these spaces back into the public realm. The proposal will create a new distinctive space for visitors and residents to enjoy with the new staircase through the Ferry Glen encouraging public access to the woodland whilst remaining sensitive to the local biodiversity.

It is considered that the proposal will preserve and enhance the special character and appearance of the conservation area and is consistent with the Queensferry conservation area character appraisal. The proposal to upgrade existing features worthy of conservation, such as the Dalmeny Battery satisfies the objectives of Local Development Plan policy Env 6. The proposed interventions on the Forth Bridge demonstrates a high standard of design and utilises material appropriate to the historic environment.

#### c) Public comments have been addressed

The listed building application has generated 19 letters of objection. The reasons for objection may be summarised as follows;

- The proposed walkway on a UNESCO World Heritage Site and listed structure is contrary to Local Development Plan Policy (addressed in section 3a)
- The projections along the bridge cantilever will be visible against the skyline and will impact on the clean silhouette of this iconic structure (addressed in section 3a)
- The proposal will impact upon the World Heritage Site Outstanding Universal Value importance of the structure "fully authentic and virtually unaltered" will impact upon perceived value (addressed in section 3a)
- Walkers will be seen from the ground and from a distance spoiling the views and engineering wonder (addressed in section 3a)
- The tourist walkway on the Bridge fails to demonstrate the high standards of design required by the Council policies (addressed in section 3a)
- Contrary to Local Development Plan Policy ENV 5 and ENV 6 (addressed in section 3b)
- The proposal to cover the battery and landscape the emplacements is a poor effort to enhance or fully preserve the battery and emplacements contrary to LDP policy Env 5 and Env 6. The installation of glazed capping to the Dalmeny Battery would be detrimental (addressed in section 3a)

Non-Listed Building matters raised in objection to the Listed Building application are assessed in the parallel application for planning permission reference 19/04116/FUL. In summary these matters relate to design of the new building, impact upon the World Heritage Site, impact on local residential amenity, lack of infrastructure and loss of trees.

#### Conclusion

The proposed alterations to the listed buildings are small in scale and sensitively designed and as such would protect the key characteristics of the listed buildings. The proposal will preserve and enhance the special character and appearance of the conservation area and is consistent with the Queensferry conservation area character appraisal. The proposal satisfies the objectives of Local Development Plan policy Env 6. The proposed interventions on the Forth Bridge demonstrates a high standard of design and utilises material appropriate to the historic environment.

The development complies with the Planning (Listed Building and Conservation Areas) Scotland Act 1997 as it preserves the setting and integrity of the listed building.

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

#### 3.4 Conditions/reasons/informatives

#### Conditions:-

1. No demolition shall take place on the site until the applicant has secured and implemented a programme of archaeological work (excavation, analysis & reporting) 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 paint colour scheme shall be submitted to and approved in writing by the Planning Authority within three months of the date of this consent, or prior to work commencing on site, whichever is the sooner.
- 3. Full details of the proposed capped glazing rooflight to the Dalmeny Battery shall be submitted and approved in writing by the Planning Authority before work commences on the Dalmeny Battery.

#### Reasons:-

- 1. In order to safeguard the interests of archaeological heritage.
- 2. In order to safeguard the character of the statutorily listed building.
- 3. In order to safeguard the character of the statutorily listed building.

#### **Informatives**

It should be noted that:

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

## **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 is not subject to 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 20 September 2019 and a site notice displayed, the time period was extended until 7 November 2019. 19 letters of objection 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 proposal is subject to the policies of the Edinburgh

Local Development Plan.

**Date registered** 29 August 2019

Drawing numbers/Scheme 1-33,

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#### **Links - Policies**

#### **Relevant Policies:**

#### Relevant policies of the Local Development Plan.

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

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 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.

## **Relevant Non-Statutory Guidelines**

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

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

# **Appendix 1**

Application for Listed Building Consent 19/04118/LBC at Forth Rail Bridge, Hawes Brae, South Queensferry Installation of bridge access system on Forth Bridge and installation of glazed capping to Dalmeny Battery

#### **Consultations**

Recommendations of the Statement of Outstanding Universal Value include "submitted plans for any proposed visitor centre at the earliest possibility to the World Heritage Centre for review"

Historic Environment Scotland confirm that this process has been actioned.

No communication has been received from the World Heritage Centre in respect of the proposal.

#### **Edinburgh Urban Design Panel**

#### 1 Recommendations

The Panel welcomes the opportunity to provide advice on the Forth Bridge Experience at this early stage in the design process. The Panel recognises the educational and cultural benefits of enabling people to connect with bridge. This an exciting project on an interesting scale, with potential to attract large numbers of visits.

In particular, the Panel supports:

- o The focus on maintaining visitor numbers at a manageable level;
- o Enabling and encouraging people to access the Forth Bridge Experience by rail, bicycle or on foot;
- o Improvements and extensions to surrounding footpaths;
- o Integrating rail travel into the Bridge Experience.

In developing the proposals, the Panel suggests further consideration should be given to:

- o A bolder design for the Reception Centre;
- o Strong emphasis on landscape design, particularly in relation to site layout;
- o Use of 3-D visualisations to test the impact of design solutions on relevant views;
- o Ensuring all interventions are reversible;
- o A clear rationale for colour choices;
- o Effective traffic and carpark management;
- o A robust visitor booking system;
- A thorough approach to security.

#### 2 Planning Context

#### Site Description

The site lies under the Forth Road Bridge. The Forth Bridge is a statutory category-A listed building. The bridge is 2.5 km long and 110m high cantilever bridge completed in 1890.

UNESCO inscribed the Forth Bridge as a World Heritage Site on 5 July 2015, it has a Statement of Outstanding Universal Value and a Management Plan. Network Rail, the applicant, owns the Forth Bridge and is responsible for its operation and maintenance, but wider World Heritage issues are coordinated by the Forth Bridges Forum.

The application site is accessed off Hawes Brae (B924) and will incorporate Fort House, currently a residential dwelling with category-A gun emplacements within its curtilage. The area under the bridges formally had industrial uses and is hard cored over and currently secure fenced. Electricity substations sit at the foot of the bridge piers.

#### Planning Policy

In the Edinburgh Local Development Plan (LDP), the part of the site to the west of the bridge is allocated as open-space ENV 18, it is also designated as a Special Landscape Area, policy ENV 11. The land to the east of the bridge is designated as greenbelt, policy ENV 10 is relevant.

Policy ENV1 Development within a World Heritage Site and ENV3 Development affecting the setting of a listed building.

The site is within the Queensferry Conservation Area where policies ENV 5 and ENV 6 apply. The shore area under the bridge is within the Firth of Forth Natura 2000 site and SSSI, policies ENV 13 and ENV 14 area relevant. It is designated as a Local Nature Conservation site, policy ENV 15. The site is adjacent to Dalmeny Historic Garden/designated landscape inventory NT 16488 77731, added 01/07/1987, policy ENV 7 applies.

#### Planning History

The applicant requested and EIA screen on 25 May 2017. There is no other relevant planning history to the site.

#### This report

No declarations of interest were noted.

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

This report is the view of the Panel and is not attributable to any one individual. The report does not prejudice any of the organisations represented at the Panel forming a differing view at the proposals at a later stage.

#### 3 Panel Comments

The Panel's detailed comments are as follows:

#### Accessibility

The Panel strongly supports the proposed emphasis on enabling and encouraging people to access the Forth Bridge Experience by rail, bicycle or on foot, in particular proposed improvements to the pedestrian route from Dalmeny Station and Jacob's Ladder, and new paths leading to/from the shore - all of which will benefit the wider community. While the Panel accepts it will be necessary for some visitors to arrive by car or minibus, it encourages the integration of rail travel, as far as possible, into the Bridge Experience.

The Panel notes that the new carpark will be barrier-operated, with access restricted to private cars and mini-buses, excluding coaches. A strong focus on good traffic and carpark management, including staff parking, is needed to ensure the facility runs smoothly. It may be possible to locate coach parking near Hawes Pier.

#### Visitor management

The Panel notes that no more than 120 people, in eight groups, will be climbing the bridge at any one time, and that indoor facilities will be limited to a briefing room, changing rooms, and WCs. It highlights the importance of maintaining visitor numbers at a manageable level by operating a robust booking system focussed on attracting people who are sufficiently fit to undertake the bridge climb.

While it is acknowledged that a café could benefit visitors, particularly in cold or windy weather, it is likely that the absence of a café will help keep visitor numbers within manageable limits.

#### Site Layout

The Panel considers that the site layout lacks a coherent landscape design and is currently dominated by visitor parking. The proposed intervention within the Greenbelt (visitor carpark/vehicle access/turning circle) is the least satisfactory part of the design. Addressing these shortcomings should be a priority in taking forward the proposal.

#### Design concept

The Panel encourages a bolder design for the Reception Centre because the current proposal appears to turn its back on the bridge.

Some Panelists feel an opportunity has been missed to create a sense of arrival, such as a generous view of the bridge from the building. This could, for example, enable visitors to watch climbers in action. Alternatively, if absent from the building, the view could be part of the joy of climbing.

The Panel emphasises the importance of ensuring all interventions affecting the bridge are reversible.

#### Impact on setting

Although surrounded by sensitive designations, the Panel considers this setting capable of supporting a more visible intervention. Instead of hiding the building, the developer is encouraged to create good architecture that enhances the view from land, bridge and water.

SNH landscape visualisation standards should be used to demonstrate impact from various viewpoints, including close-up views of facilities and infrastructure, e.g. from surrounding roadways. Analysis should also take account of the visual impact of 120 climbers on the bridge.

#### Colour

The Panel recommends submission of a clear rationale for the choice of colour for new infrastructure and climbing wear. Suggestions vary, including:

- Making walkways match the colour of the existing bridge
- Painting new infrastructure a drab colour
- Using colour to achieve a clear contrast between new/existing infrastructure
- Making climbing suits match the colour of the existing bridge to ensure climbers "blend" with the structure and avoid an "ant-like" appearance.
- Bright yellow climbing suits.

#### Security

The Panel encourages a thorough approach to security, ensuring use of appropriate locks, bolts etc.

#### **HES** comment

#### Our Advice

This application brings forward works to both the category A-listed Forth Bridge and the category A-listed Dalmeny Battery - part of a wider scheme to provide visitor access to the Forth Bridge. As this is a listed building consent application, we have consented our response here to the impact of the physical alterations.

We provided pre-application advice in April and have attach a copy as an Annex to this letter. We did not anticipate any significant impacts and, having reviewed the finalised proposals and supporting information, we remain of the view that the physical alterations would likely only result in minor impacts. From reading both the Design Statement and Heritage Statement we agree with the design principles, including and especially minimising connection points and reversibility for new access infrastructure on the bridge. The technical drawings do appear to illustrate these principles.

Looking at the proposals for Dalmeny Battery, we are pleased to see its incorporation into the landscaping works and that (as noted in the Design Statement, page 41) some repair works would be undertaken. We have no issue with the proposed glazed capping to the light well.

We have also received your consultation for the parallel planning application and will therefore respond separately with our view on the potential impacts of development on the Outstanding Universal Value (OUV) of the Forth Bridge World Heritage Site, and on the setting of both the Forth Bridge and Dalmeny Battery as category A-listed structures.

Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object. However, our decision not to object should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on listed building/conservation area consent, together with related policy quidance.

#### Further Information

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

#### **Archaeology comment**

The application concerns the A-listed Forth Railway Bridge and A-listed adjacent early 20th Century Dalmeny Battery, both structures of national historic and archaeological significance. Accordingly, this application must be considered under the terms Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), Historic Environment Scotland's Policy Statement (HESPS) 2016 and Archaeology Strategy and CEC's Edinburgh Local Development Plan (2016) Policies ENV4, ENV8 & ENV9.

#### Forth Rail Bridge

These proposals will require construction in and around this nationally important listed structure. However, it is considered that these works will not have a significant adverse impact either upon the physical historic fabric of the bridge nor upon its setting or character.

#### Dalmeny Battery

It is welcomed that this important military emplacement will be preserved and form a central point of new visitor centre within enhanced landscaping. The installation of the glazed capping will aid this. Further, the installation of this glazed capping is not considered to have a significant impact upon either the character of this structure nor have upon its fabric.

Accordingly it has been concluded that these proposals do not have a significant archaeological impact, archaeological mitigation will be required as per my comments (see memo dated 10/10/19) to the associated/linked FUL application 19/04116/FUL.

## **Location Plan**



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