Development Management Sub Committee

Wednesday 2 June 2021

Application for Listed Building Consent 20/05442/LBC at 109, 110 and 111 Princes Street, 112 Princes Street and 144-150 Rose Street, (Debenhams)

Application for listed building consent proposing the selective demolition of department store structure (Debenhams) behind retained listed facade, external and internal alterations including extensions, to form hotel and associated uses together with ancillary works.

Item number

Report number

Wards

B11 - City Centre

Summary

The development complies with the Planning (Listed Building and Conservation Areas) Scotland Act 1997 as it preserves the character of the listed buildings and preserves or enhances the character and appearance of the conservation area.

Links

Policies and guidance for this application

LDPP, LEN04, LEN06, NSG, NSLBCA, CRPNEW, HES, HEPS, HESUSE, HESINT,

Report

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Recommendations

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

Background

2.1 Site description

The application relates to the former Debenhams department store, occupying two adjoining buildings on Princes Street within the block between Frederick Street and Castle Street and part of a building on Rose Street. These buildings are described in detail below.

112 Princes Street

The former department store occupies the former Conservative Club at 112 Princes Street by Robert Rowand Anderson, dating from 1882-4. All that remains of this building is its four storey and attic, Free Renaissance style, sandstone facade with reconstructed elements comprising the gable chimneys, red tiled roof, dormers and part of the ground floor elevation with altered to form shop display windows. The only salvaged internal features are the arcaded stair and associated stained-glass windows which were reconfigured and relocated towards the rear of the building. The reconstruction was designed by Ketley,Goold & Clark (with Simpson & Brown) and carried out from 1978-81. Six storeys of concrete floor plates were erected extending from Princes Street to Rose Street South Lane. The building is category B listed (listed building reference: LB29512, listed on 13 April 1965).

109, 110 and 111 Princes Street

The former store also occupies most of the building at 109, 110 and 111 Princes Street which includes the 1869 Palace Hotel by John Lessels which became the Liberal Club. This building is a four storey, attic and garret, French Renaissance style, sandstone structure with modern shopfronts at ground level and a modern glazed infill on the west side. The only part of this building not occupied by the former Debenhams store is the ground floor of the historic structure.

The interior was mainly reconstructed as part of the department store formation in the late 1970s/early 1980s, although the stair and entrance hall, decorative ceiling plasterwork and remnants from the Gladstone Memorial Library survive. The building is category B listed, side (listed building reference: LB30147, listed on 12 December 1974).

144-150 Rose Street

The final premises occupied by the former Debenhams store comprise the basement ground and first floors of 144-150 Rose Street. This building was originally a three storey and attic tenement erected in 1780 but was demolished retaining parts of the facade only as part of the department store creation of 1978-81. The original ground floor frontage was replaced with a modern sandstone shopfront. This building is category C listed (listed building reference: LB29650, listed on 28 March 1966).

There are internal connections between the two main buildings. The ground and mezzanine levels of 112 Princes Street connect with the basement and first floors of 144-150 Rose Street via the basement of the Rose Street building and a link structure in Rose Street South Lane.

The site is within the Old and New Towns of Edinburgh World Heritage Site and is adjacent to several other listed buildings and structures, notably 152 and 154 Rose Street (including the Kenilworth Bar) and 112-114 Rose Street Lane South West (listed building reference: LB29651, listed on 12 December 1974). Princes Street Gardens, part of the New Town Gardens Designed Landscape (reference: GDL00367), is situated to the south of the site.

The surrounding area is in mixed, predominantly commercial, use including shops, offices, hotels, restaurants and bars.

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

2.2 Site History

6 August 2020 - Proposal of Application Notice approved for redevelopment and change of use of the existing premises to form a hotel with rooftop bar/restaurant, active uses at lower floors including restaurant, bar, retail, flexible meeting and event/venue space, health suite/gym, together with ancillary uses, associated works, alterations and demolitions (Use Classes 1, 2, 3, 4, 7, 11 and sui generis) at 109, 110 and 111 Princes Street, 112 Princes Street and 144 - 150 Rose Street (reference 20/02952/PAN).

Several applications for planning permission, listed building consent and advertisement consent associated with the operation of the Debenhams department store have been submitted and granted, but no major changes have been made to this group of buildings since the late 1970s/early 1980s.

Main report

3.1 Description of the Proposal

The application is for selective demolition of the former Debenhams department store along with external and internal alterations, including extensions, to form a new hotel with associated uses.

External Alterations

- demolish the entire late 1970's concrete structure behind the retained façade of 112 Princes Street and erect a new nine storey and basement structure with a predominantly glazed rooftop bar/restaurant with an ancillary aluminium-clad structure, a central lightwell finished in white glazed brick and glass reinforced concrete (GRC) cladding panels with astragalled aluminium-framed windows and a stepped GRP/standing-seam zinc-clad elevation with vertically-aligned window openings to Rose Street South Lane;
- reconstruct the existing roof and chimneys of no. 112 using the existing external materials and matching infill elements, extending the ridge height of the façade and incorporating three new contemporary style, lead-clad dormers;
- replace the existing two-storey bridge link between 112 Princes Street and 144-150 Rose Street with a reduced-scale, metal-louvred link housing plant and
- demolish the existing glazed link structure at 111 Princes Street and erect a new link structure comprising an arcaded façade in GRC with extensive glazing behind, with balconies, planted arches, a pitched slated roof to Princes Street and standing-seam zinc cladding on the gable and rear roof sections.

Internal Alterations

- relocate the historic Conservative Club stair as a centrepiece feature within the front of house/public areas of the new hotel, along with the associated stainedglass windows in the west gable wall;
- erect new partitions at first and second floor level in the formal Liberal Club building, retaining the historic decorative plasterwork ceiling and the Gladstone's Library bookcase in situ on the first floor.

The associated application for planning permission (reference 20/05444/FUL) is for the redevelopment and change of use of the existing premises to form a 207 bedroom hotel with a rooftop bar/restaurant and mixed uses on the lower floors including restaurant, bar, retail, health suite/gym and a flexible meeting and event/venue space (use classes 1, 2, 3, 4, 7, 11 and sui generis).

The original scheme submitted has not changed, apart from very minor design amendments and further annotations have been added to certain drawings to clarify particular aspects regarding the location of internal heritage assets.

Supporting Documents

The following key documents have been submitted in support of the application and are available to view on the Planning and Building Standards Online Services:

- Planning Statement;
- Heritage and Townscape Statement;
- Design and Access Statement;
- Townscape and Visual Impact Assessment including verified views and
- Archaeological Written Scheme of Investigation.

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 buildings;
- b) the proposals preserve or enhance the character or appearance of the conservation area:
- c) any impacts on equalities or human rights are acceptable and
- d) public comments have been addressed.

a) Character and Setting of Listed Buildings

Section 59 (1) of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 states:-

"In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

Historic Environment Scotland's guidance on *Managing Change - Reuse and Adaptation of Listed Buildings and Interior of Listed Buildings* set out the principles that apply and how they should inform planning policies.

LDP Policy Env 4 permits proposals to alter or extend a listed building where the alterations or extensions are justified; there will be no unnecessary damage to the building's historic structure or diminution of its interest; and any additions are in keeping with other parts of the building.

Character of 112 and 109-110 Princes Street

The redevelopment of these important listed buildings in appropriate and sustainable long-term uses is welcomed.

Only parts of the original façade and interior remain of the category B listed, former Conservative Club. The entire structure behind the façade was demolished in the late 1970s, significantly reducing the building's historic and architectural integrity through the total loss of the original plan form, significant internal spaces and majority of decorative interior features. The reconstruction of the front roof pitch, gable chimneys and elements of the façade, along with the relocation and alteration of the main stair, further contributed to the erosion of the building's special historic and architectural interest and authenticity. The replacement concrete structure is functional in design with misaligned floors to the façade windows and makes no reference to the historic plot form or buildings that formerly stood on the site. The demolition of this modern addition is therefore acceptable in principle.

The floor heights of the proposed new structure relate to the original façade windows, using duplex suite layouts to accommodate high floor to ceiling heights without having visually intrusive floorplates in external views. The views over Princes Street Gardens to Castle Rock from the Smoking Room and Dining Room of the former club will be reinstated, albeit from within hotel bedroom suites. The plan form incorporating a central atrium with front and rear accommodation blocks linked by a corridor takes its reference from the late Victorian plot layout and period up until major redevelopment. An aerial photograph from 1976 captures the existing buildings on the site which comprised the former Conservative Club with a tall, but subservient link structure adjoining a six storey and attic building on Rose Street South Lane.

The height of the proposed building at roof level, with the exception of the rooftop bar and ancillary structure behind, is only marginally higher than that of the existing concrete building. Whilst the proposed rooftop bar and ancillary structure is a significant addition to the original roof height, the façade of the "Skybar" will be set well back from the ridge line of the re-constructed front roof pitch. This set back, along with visually lightweight materials and a flat roof at minimal height will ensure that the new rooftop addition will have no detrimental impact on the surviving historic façade of 112 Princes Street.

Historic Environment Scotland considers that the proposed heightening of the roof ridge and stone gables/chimneys would adversely impact on the existing appearance and special interest of the building. However, there are mitigating circumstances for these alterations as detailed below.

The proposed reconstruction and extension of the front roof pitch at the existing angle, resulting in a raised ridge height and rebuilding of the gable chimneys at a higher height than the existing is proposed for practical and aesthetic reasons.

Both reconstructions are acceptable in principle given that the Simpson and Brown records of the late 1970's redevelopment works indicate that new material was used for the most part. Photographs during construction show only a few red tiles which are darker than the rest and it likely that these darker, tarnished tiles were salvaged originals. In construction photographs of the west chimney stack it would appear that new sandstone blocks were used, going by the relatively light tone of the blocks. Also, mid-20th century photographs show that, by this time, three dormers had been added above the existing dormers and it is not possible to ascertain from photographic, physical or written evidence whether the original ridge height was extended to accommodate these additional dormers. The proposed dormers are symmetrically arranged above the existing dormers and are an acceptable addition in order to achieve the required number of hotel bedrooms to make the project viable without adding any more unnecessary mass. The contemporary style of the proposed dormers will distinguish these modern additions from the reconstructed historic dormers to demarcate clearly the evolution of the original façade over time.

The lifting the roof ridge results in the need to raise the height of the gable chimney stacks to avoid an awkward relationship between the ridge line and the chimneys. This has been illustrated on a drawing which shows that the new ridge line would sit slightly above the level of the chimney stacks (excluding pots) were the existing chimney height retained. The proposed raising of the chimney stacks will re-establish the originally intended prominence of the chimneys in relation to the ridge height. The raising of the ridge height has the added advantage of providing a solid barrier to the proposed rooftop bar terrace in lieu of a conspicuous open balustrade which would have looked out of place above the ridgeline.

As regards the existing rear elevation, this is a blank metal-clad façade with louvres, a brick gable wall and open service yard at ground floor level. Whilst the canted upper levels provide a degree of articulation and reduction in visual bulk, this elevation does not contribute positively to the character of the listed building. The proposed replacement structure is similar in terms of ridge height, but only has slight set backs at the upper levels. The impact of this form is not significant in terms of the character of the historic façade of no. 112, but the proposed replacement elevation with windows throughout is a more appropriate design in terms of being a modern interpretation of the Victorian tenement that once stood on this site in Rose Street South Lane. The proposed materials in type and tone and vertically aligned window openings contribute to this design concept.

The reduction in the scale of the bridge structure will further improve the oppressive, utilitarian character of the existing rear elevation.

In terms of materials for the remainder of the new building, these are appropriately specified and placed, focusing the non-traditional GRC panels at the rear and on gables. The use of glazed brick for the lightwell walls is based on a historic use of this material for lightwells, as seen on other listed buildings of commercial character within the First New Town and the proposed Crittal style windows in the new glazed brick elevations are typical of original windows within such lightwells. The predominant use of glazing for the proposed rooftop bar and link corridor to the service block behind is appropriate to evoke the effect of a traditional large cupola whilst keeping the new addition visually lightweight and the proposed grey aluminium cladding on the rear section will keep this ancillary block visually subdued from elevated viewpoints.

The existing glazed link structure at 111 Princes Street is part of the late 1970's redevelopment and comprises an architecturally lightweight, contemporary solution to connecting the two listed buildings. The link of is no special architectural significance, so its replacement is acceptable in principle. The new link is a more assertive, but complementary solution which involves a traditional arcaded form drawing on the double-height elements and rhythm of openings within the facades of the flanking listed buildings. The arcaded form allows for an appropriate level of depth and detailing in this context of Victorian architecture and signals the use of the ground floor level as an arcade linking through from Princes Street to Rose Street. The increased facade height compared to the existing link structure will have no detrimental impact on the appearance or visual prominence of either listed building, given the delicate nature of the arcaded architecture and the fact that views of both buildings looking along Princes Street are already interrupted by projecting elements of the flanking buildings. Only a restricted area of the more visible east gable chimney of no. 112 will be obscured in west-looking views, given that the top levels of the proposed infill are set back, and the chimney stacks of no. 112 will be raised up. The slated, mansard-type roof on the arcaded link references the mansard roof forms of the listed buildings and the use of GRC for the arched frame elements is appropriate in order to achieve a delicate and detailed structure in a complementary warm-grey tone.

Internally, the proposed relocation of the surviving main stair of no. 112 is acceptable in principle as this stair is not in its original location and form. The historic arcaded stair and hall was designed by Sir Robert Rowand Anderson as a grand entrance feature of the Conservative Club, but these elements were taken down and reinstated in an altered form at the rear of the new retail floorplate as part of the 1970's redevelopment. The stair is without its original raised stepped platform and the stained-glass windows are within the concrete structure, receiving no natural light. The stair will be repositioned on a north-south alignment to become a focal point within the new hotel's centrepiece atrium and means of access to the hotel suites at first floor level. The stained-glass windows will receive natural light again through relocation in an external section of the west elevation. A condition has been applied to ensure that the necessary dismantling and storage of these historic features during demolition and construction works is undertaken appropriately to avoid damage to or loss of fabric.

The interior of the former Liberal Club at 109-110 Princes Street was mainly reconstructed as part of the late 1970's department store development, although the stair and entrance hall, decorative ceiling plasterwork and remnants of the Gladstone Memorial Library survive. The proposed partitions at first and second floor level are therefore acceptable in principle. The surviving historic ceiling will be retained below a new ceiling supported on the bedroom partitions with no fixings into decorative plasterwork. The opportunity to retain sight of the original ceiling through viewing 'windows' was explored but dismissed on the grounds of acoustic integrity and fire protection. Given the other significant benefits of the development, the full enclosure of this ceiling is an acceptable compromise.

With reference to the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 the proposals preserve the adjacent listed buildings including any special architectural or historic interest they possess, in compliance with LDP Policy Env 4.

b) Character and Appearance of Conservation Area

Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 which states:

"In exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

The New Town Conservation Area Character Appraisal identifies the key characteristics of the First New Town as:

- "Georgian and early Victorian rectilinear development of grand formal streets lined by fine terraced building expressing neo-classical order, regularity, symmetry, rigid geometry, and a hierarchical arrangement of buildings and spaces with controlled vistas and planned views; and
- the important feature of terminated vistas within the grid layouts and the longdistance views across and out of the conservation area."

The proposed tourism/leisure and commercial uses are in keeping with the predominantly mixed-commercial character of the First New Town and will contribute to the vitality of the conservation area. In addition, the character and appearance of this particular section of Princes Street will be preserved and enhanced through the sensitive re-development of these important category B listed buildings in a sustainable and viable use.

The proposed development will reinstate significant qualities of the historic plan form of this block that were by destroyed by the late 1970's Debenhams development, although the original Georgian spatial structure and hierarchy of principal streets and buildings had been lost several decades before. The plan form of the proposed new structure to the rear of no. 112 will restore a sense of the Victorian block plan, seen in the oblique aerial view of the site in the 1976 photograph. Whilst the new building is of greater mass than the previous buildings that occupied the site from Princes Street through to Rose Street South Lane, the inclusion of a lightwell within the structure will provide a physical space that evokes both the Victorian layout of this block and the lightwells behind the Princes Street frontages which were characteristic of the same period. The development also incorporates a modern interpretation of the type of historic north-south running arcade that once existed on Princes Street, including within a previously demolished building to the east of the site.

The proposed rooftop and rear additions proposed to the existing envelope, whilst not insignificant in scale, will not alter the essential hierarchical urban plan form of the First New Town nor interfere with its important vistas and views to any detrimental extent, even although existing views from key street level and elevated locations will change. The ancillary structure to the rear of the "Skybar" is required to meet fire safety standards at all levels, i.e. two separate fire-fighting cores and means of escape and provide basic support services, including WCs, for the bar at the same level. This structure is the minimum size possible to accommodate these services.

Verified views of the proposed development have been produced from a series of key vantage points. The two locations which best illustrate the effect of the development on the existing hierarchy of buildings are from Edinburgh Castle ramparts looking north and from Mound Place looking north-west. The photomontages from these positions show that the added elements will have an impact on the existing views, but this impact will be positive or neutral, rather than negative, bearing in mind that every view is transient.

From the Castle ramparts, the functional, inarticulate expanse of the existing grey flat roof is evident, although the upper floors of the rear elevations of the buildings on the south side of George Street are clearly visible. The proposed "Skybar" with ancillary structure behind and the squared-off upper storeys of the rear elevation will obscure a greater percentage of these George Street buildings, without blocking existing views of the upper levels of the buildings on the north side of George Street. Views of the latter buildings are more important, given that the rear elevations of the south side buildings include substantial, utilitarian extensions. The visually lightweight and delicate design of the new rooftop bar will provide articulation and interest at this level which will offset the reduction in sight of the buildings on the south side of George Street and the service block on the rear section of the roof will not be visually intrusive due to its lower-lying height and restricted area.

As regards the existing views of the site from Mound Place, there is no sight of any of the buildings beyond to the north-west due to the height and massing of the existing concrete structure and link building. The proposed development will enhance rather than diminish this view through the provision of a replacement structure with more articulate, interactive and visually "softer" upper levels than the existing concrete box forms. Materials have been specified to complement the tone and character of the historic roofscape and glazing/aluminium at the highest levels will provide the required level of visual light weight.

The existing and proposed views of the site looking east and west along Princes Street and from within Princes Street Gardens will not change to any extent that would affect the essential character or appearance of the conservation area. The proposed infill building relates well to the mixed-use character of this particular block and Princes Street in general. The design is elegant and draws reference from the flanking Victorian buildings and other buildings of similar age and style along Princes Street.

Whilst there will be a significant increase in mass within Rose Street South Lane, this element of the development will only be visible from the junction of Rose Street and the lane and from within the lane. The former view is transient, and the increased mass will be offset by a more visually appropriate and interactive elevation than the existing blank, functional frontage. Also, the historic character of the lane has been severely eroded by large rear blocks erected mainly in the 20th century as additions to commercial premises on Princes Street, so the proposed building will have no detrimental impact on the character or appearance of this part of the First New Town.

The proposed development has also been tested in longer views from the south, including from Ferry Road and the new roof forms and additions to the existing envelope will not be conspicuous within this wider context. These elements will not register against the existing mixed roofscape, with many buildings, towers and spires sitting at a higher level than the proposed structures.

The geometric forms and materials of the proposed rooftop extensions and structure fronting Rose Street South Lane are design as modern interpretations of historic architecture within the First New Town. The specified materials palette is appropriate in this context, using a blend of traditional and contemporary materials, including glass, natural slate and zinc cladding with standing-seam detailing, GRC panels and aluminium cladding. These materials are used in other modern developments within the New Town Conservation Area, particularly in the commercial core and the various tones chosen for this development have been focused on areas where they will complement the existing historic buildings and reduce visual impact where this is important to preserve key views of the characteristic Princes Street roofscape. The use of simple, open vertical metal balustrades to enclose the proposed roof terraces will avoid visual intrusion around these edges. Whilst the glazed "Skybar" will reflect light to a certain degree, traditional cupolas in the New Town do likewise and the brise soleil along the Princes Street frontage will minimise glare in the summer months. As regards light pollution during hours of darkness, the lighting within the rooftop spaces will switch to pre-determined muted evening settings and the accommodation has been "sunk" below the roof line with the solid terrace parapet and large chimneys providing screening to minimise light spillage.

A condition has been applied to ensure that the materials specifications are acceptable in terms of finer detailing, precise finish/tone and sustainability.

With reference to the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 the proposals preserve the character and appearance of the conservation area, in compliance with LDP Policy Env 6.

c) Equalities and Human Rights

The development respects the provisions of the Equality Act 2010 by including accessible access throughout the building, including all lift cores.

d) Public Comments

New Town and Broughton Community Council

No comments received.

Material Objections

The Architectural Heritage Society of Scotland

- the increase to the height of 112 Princes Street will disturb the existing scale within the building, increasing the dominance of the roof beyond the original design intent, so the roof and chimneys should therefore be left as-is - this has been addressed in section 3.3 b);
- the inserted dormers will introduce a modern element into the traditional portion of this roofline and should be omitted entirely - this has been addressed in section 3.3 b);

- the proposed building is a floor too high this has been addressed in sections
 3.3 b), c) and d);
- the new link building is also a storey too high, with the upper level of dormers again overemphasising the roof - this has been addressed in sections 3.3 b) and c).

Support Comments

Essential Edinburgh

 the proposals reimagine a historic building for modern day use reflecting the changing needs of the city centre.

The other comments in objection and support relate to the proposed use and other aspects relevant to the associated application for planning permission.

Conclusion

The development complies with the Planning (Listed Building and Conservation Areas) Scotland Act 1997 as it preserves the character of the listed buildings and preserves or enhances the character and appearance of the conservation area.

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

3.4 Conditions/reasons/informatives

Conditions :-

- 1. No demolition shall start until the applicant has confirmed in writing the start date for the new development by the submission of a Notice of Initiation for planning application reference 20/05444/FUL.
- A detailed specification, including trade names where appropriate and sources, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
- 3. A programme of archaeological works, in the form of a Watching Brief during construction works, shall be undertaken to mitigate any potential impacts on archaeological remains. Details of this programme shall be submitted to and approved in writing by the Planning Authority, having first been agreed by the City Archaeologist.
- A methodology statement for the dismantling, storage and re-installation of the original stair and stained-glass windows in 112 Princes Street shall be submitted to and approved in writing by the Planning Authority before these features are disturbed.

Reasons:-

- 1. In order to safeguard the character of the conservation area.
- 2. In order to enable the planning authority to consider this/these matter/s in detail.
- 3. In order to safeguard the interests of archaeological heritage.
- 4. 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.

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

There is no pre-application process history.

8.2 Publicity summary of representations and Community Council comments

The application was advertised on 18 December 2020. A total of three representations were received, comprising two objections - one from the Architectural Heritage Society of Scotland and one comment from Essential Edinburgh in support.

A full assessment of the representations can be found in the main report in the Assessment Section.

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 defined in

the Edinburgh Local Development Plan.

Date registered 7 December 2020

Drawing numbers/Scheme 1,2,3A,4-20,21A,22-28,29A-38A,39,40A,41,42A-

49A+50-55,

Scheme 1

David GivanChief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Clare Macdonald, Senior Planning Officer

E-mail: clare.macdonald@edinburgh.gov.uk

Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

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.

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.

Relevant Government Guidance on Historic Environment.

The Historic Environment Policy for Scotland 2019 outlines Government policy on how we should care for the historic environment when taking planning decisions.

Managing Change in the Historic Environment: Use and Adaptation of Listed Buildings sets out Government guidance on the principles that apply to enable the use, the reuse and adaptation of listed buildings.

Managing Change in the Historic Environment: Interiors sets out Government guidance on the principles that apply to alterations to the interiors of listed buildings.

Appendix 1

Application for Listed Building Consent 20/05442/LBC At 109, 110 And 111 Princes Street,, 112 Princes Street And 144-150 Rose Street, (Debenhams)

Application for listed building consent proposing the selective demolition of department store structure (Debenhams) behind retained listed facade, external and internal alterations including extensions, to form hotel and associated uses together with ancillary works.

Consultations

Historic Environment Scotland

This application proposes the alteration of two listed buildings. We have been involved in several pre-application discussions and can see how the proposals have developed. One of our main aims in the process has been to retain the independent character of the individual listed buildings. While we consider this would be achieved under the proposals, we do have some detailed comments and consider that further consideration to the handling of 112 Princes Street would be beneficial.

Taking the two listed buildings in turn:

Alteration of 112 Princes Street (B-listed)

Originally the Scottish Conservative Club of 1884, the building was façade-retained as part of the major Debenhams re-development in 1978-81. The primary significance of the listed building is the Princes Street frontage. While the façade's ground floor was altered and some stonework replaced and restored, its retention along with the replacement of the roof and broad chimney stacks to match the originals, appears to have been a deliberate decision to retain the original appearance and character of the frontage as far as possible. The works were undertaken with conservation advice from Simpson & Brown architects.

As we have argued, the primacy and appearance of the frontage of No.112 should be retrained, including the roofscape and chimney stacks/gable. The proposed rooftop additions have been amended during the pre-application process to achieve this aim and we now have no significant issues with this element. However, a new aspect of the proposals, which we hadn't fully appreciated at pre-application stage, involves the increase in the height of both the roof and gable chimney stacks. It appears this is required to facilitate new floor levels.

We have always argued against the addition of a new row of dormer windows within the highly-visible roofscape, which itself was carefully handled in the façade-retention scheme. As their provision seemingly requires both the heightening of the roof and stone gables/chimneys, this would strengthen arguments against their provision.

As we consider these works would adversely impact on the existing appearance and special interest of the building we would suggest again that the additional floor and dormers are deleted from the proposals.

As the building is of very little interest behind the façade (with the exception of the reset stair) and beyond the roof, we have no issue with the scope of intervention and have no detailed comments to make. We are pleased to see that the historic Conservative club staircase will be relocated and retained prominently within the new interior (this was obviously a key issue in the original façade-retention of the building). An additional condition showing its detailed dismantling and re-erection may be useful.

Alteration of 109-111 Princes Street (B-listed)

109-110 Princes Street was built as The Palace Hotel in 1867, converted to the Scottish Liberal Club in the 1890s and again converted into Debenhams in 1978-1981. Independent retail units occupy the ground floor. Internally, the main stair survives as does features from the Liberal Club - most notably the Gladstone Memorial Library bookcase. We are pleased that the intention is that these elements will be relocated and retained, although it does not appear to be explicitly clear where these features would be located. The Design Statement mentions locating in public areas, which suggests this could be 112 Princes Street. Our preference would be for retention within 109-111 Princes Street, and would suggest a condition is added to any consent to address this.

111 Princes Street is the 1980s link building. We have no issues with its replacement as is being proposed. However, the height of this may need to be reduced/adapted if the current gables and chimneys of No.112 remain at their current height which is our preferred solution.

We are happy to comment further on the comments above and look forward to seeing revisions that address our concerns.

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 guidance.

Archaeology

Further to your consultation request I would like to make the following comments and recommendations in respect to this application for listed building consent proposing the selective demolition of department store structure (1980's, Debenhams) behind retained listed facade, external and internal alterations including extensions, to form hotel and associated uses together with ancillary works at 109, 110 and 111 Princes Street, 112 Princes Street and 144-150 Rose Street, Edinburgh, EH2 3AA.

The application site concerns the former Debenhams Store located at the centre of Princes Street and Edinburgh's Georgian New Town part of the cities UNESCO World Heritage Site. The site has a complex development history since first developed in the late-18th century through to the construction of the Debenhams Store in 1978, this is captured within Turely's Heritage and Townscape Statement accompanying this application. At its heart the site contains the remains of three listed buildings incorporated within the 1978 store, namely the Victorian 1860's B-listed former Place Hotel 109-111 Princes Street, The B-listed Conservative Club at 112 Princess St and the C-listed 144-150 Rose Street Lane.

Accordingly, this application must be considered under terms of Scottish Government's Our Place in Time (OPIT), Scottish Planning Policy (SPP), PAN 02/2011, Historic Environment Scotland's Policy Statement (HESPS) 2016 and Archaeology Strategy and Edinburgh Local Development Plan (2016) polices ENV4, ENV8 & ENV9.

The new plans will see significant demolitions and alterations to these buildings which will have the potential for significant impacts upon the surviving historic fabric. These works may also reveal areas of surviving historic fabric which could provide evidence of the development of these buildings and this section of the Georgian and Victorian New Town.

It is welcomed therefore that externally development seeks to retain the historic listed frontages of these listed buildings. However, it is essential that they also retain and conserve the arcade hall, stair, entrance door and stained windows located with 109-11 Princess Street along with other key historic fabric such as the smoking-room ceiling, bookcase and fireplace for the former Scottish Liberal Club also associated with this building

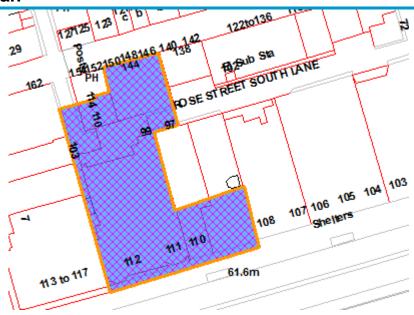
Accordingly, it is recommended that not only that a programme of archaeological work is carried out during development to both record and conserve the sites historic fabric. This will require the undertaking an archaeological building survey before and during any demolitions/downtakings/strip-outs, building upon the 1978 RCHAMS threatened building survey referred to in Turkeys report, to record in detail any historic fabric revealed. In addition, prior to development a conservation plan must be submitted detailing measures to be taken to preserve and conserve the site's historic fabric e.g. stained windows, entrance hall both during demolition and development

Accordingly, it is essential that the following condition is attached to this consent to ensure that undertaking of the above elements of archaeological work are undertaken.

'No demolition or development shall take place on the site until the applicant has secured and implemented a programme of archaeological work (excavation, conservation, reporting and analysis, publication, public engagement) 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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