

Development Management Sub Committee

Wednesday 24 November 2021

**Application for Listed Building Consent 18/07127/LBC
at 35 St Andrew Square, Edinburgh, EH2 2AD.
Demolition of boundary wall, modern basement kitchen, rear
extension, and outbuilding within existing rear garden,
regrading of land, erection of new boundary features and
public realm.**

Item number

Report number

Wards

B11 - City Centre

Summary

In terms of Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, the removal of the outbuilding and garden roof terrace, including the levelling and treatment of the new surfaces, would return the rear curtilage to an appearance more akin to its original character. However, the loss of the traditionally finished stone boundary walls and the sense of enclosure to the rear curtilage they provide would impact on the special architectural character and historic interest that the category 'A' listed building possesses. Nevertheless, the walls are not original to the construction of the townhouse with a sense of the original the rear curtilage of the historic feu maintained through the subtle delineation of curtilage walls and garden achieved through the surface materials and finishes utilised. On balance, given the careful articulation of the public realm and the non-original nature of the walls to be removed, the scale of the impact on the special architectural character or historic interest of the listed building is not considered adverse.

Although there is also, a recognised impact on the immediate setting of 35 St Andrew Square; its setting relationship with its twinned pavilion townhouse; and their compositional contribution in framing Dundas House including its forecourt, the impact is not the same from out with the site within St Andrew Square and in longer views.

The proposed public realm treatment to subtly demarcate the original feu further mitigates this overall impact. It is therefore concluded, that overall and on balance, the scale of this impact on the setting of the listed building is not considered adverse.

Furthermore, the removal of the wall is required to facilitate adequate suitable access to the new concert hall to the rear of 36 St Andrew Square and helps create a public realm to accommodate seating and dwell space to assist the legibility and function of the wider scheme for the concert hall.

While it is considered that the proposed development does not comply fully with the provisions of the HES Managing Change in the Historic Environment guidance in terms of the 'Boundaries' and 'Setting' series, the scale of the impact on the special interest of 35 St Andrew Square including its setting is not considered adverse.

In the event that the Development Management Sub-Committee does not agree with this assessment and concludes that the negative presumption is engaged, consideration was given to paragraph 15 of Historic Environment Scotland's 'Interim Guidance on the Principles of Listed Building Consent' (GPLBC) to assess whether the presumption can be rebutted.

Overall and on balance, the scale of the impact (point b of the GPLBC) on the listed building is judged to not adversely affect its special interest including its setting and the cultural and wider community benefits (point d of the GPLBC) brought about as a result of proposals would make an exceptionally positive contribution towards city's cultural, social and educational provision. The proposals would therefore, allow a departure from the presumption set out in paragraph 8 of the GPLBC in accordance with points b) and d) of paragraph 15 of the GPLBC (2019) and as such, would adequately rebut the negative presumption.

In terms of Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, the removal of the walls will generate a limited impact on the special character and appearance of the New Town Conservation Area. A sense of the original rear curtilage of the historic feu will be maintained through the subtle delineation of curtilage walls and garden through the surface materials and finishes utilised mitigating minor adverse impacts such that the overall all impact is neutral. The proposals therefore, do not remove or detract from key characteristic components of the conservation area that gives the area its special interest.

It can therefore be concluded, that the proposals are in accordance with Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

There are positive impacts on equalities and human rights arising from the creation of a high-quality environment in a highly accessible location. The proposals will generate significant positive equalities benefits to many different populations including the young, old and disabled.

Links

[Policies and guidance for this application](#)

HEPS, HES, HESCAC, HESBND, HESCON, HESEXF, HESEXW, HESSET, LPC, LEN03, LEN04, LEN06, LEN01, CRPWHS, NSG, CRPNEW, NSLBCA, NSGD02,

Report

Application for Listed Building Consent 18/07127/LBC at 35 St Andrew Square, Edinburgh, EH2 2AD.

Demolition of boundary wall, modern basement kitchen, rear extension, and outbuilding within existing rear garden, regrading of land, erection of new boundary features and public realm.

Recommendations

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

Background

2.1 Site description

The application site lies within Edinburgh city centre, to the east of St Andrew Square and incorporates the category 'A' listed building at 35 St Andrew Square including its curtilage. Harvey Nichols department store and Multrees Walk are located to the north. The forecourt of Dundas House at 36 St Andrew Square is located directly to the south.

35 St Andrew Square is a nationally important category 'A' listed building (Listed Building Reference: LB29704) and acknowledged in the World Heritage Nomination document. It is thought to have been built by James Craig to a design by Robert Adam and sits on one of the key plots and locations within James Craig's First New Town.

There are several other listed buildings and monuments in proximity to the site. These include the category 'A' listed Dundas House at 36 St Andrew Square (Listed Building Reference: LB29705), along with the Category 'A' listed Monument to John, 4th Earl of Hopetoun (Listed Building Reference: LB27862), erected in the forecourt of Dundas House and its category A listed twinned flanking townhouse at 37 St Andrew Square (Listed Building Reference: LB29706) that together frame Dundas House and its forecourt.

35 St Andrew Square is highly significant as one of the first and grandest townhouses in the First New Town. It was the first of the two pavilion townhouses that flank Dundas House to be built with its construction predating Dundas House by two years. The building comprises a symmetrical 3-storey and basement classical former townhouse with two highly decorated principal facades to both St Andrew Square and the forecourt to Dundas House. 35 St Andrew Square is established as an outstanding neo-classical building, which together with its framing pavilion at No. 37 and Dundas House as its centrepiece, remains one of the few surviving original architectural compositions on the square.

Originally built as a residence in 1769 for Andrew Crosbie of Holm, advocate and partner in the Douglas and Heron Bank of Ayr, the building was used as a hotel in 1806 before it was purchased by the Royal Bank of Scotland for their head office in 1819 when it was remodelled and extended on a number of occasions including the reproduction of three east elevation bays and the lowering of its ground floor to create its banking hall. When RBS moved next door into Dundas House, the property reverted back into hotel use where it was further enlarged.

More contemporary works to the property included the redevelopment of the rear garden area to form a raised garden terrace to accommodate a catering kitchen within the basement. A cast iron spiral staircase for fire escape and a traditionally finished single storey outhouse to house a goods lift and refuse bins were also erected within the rear garden.

The site is located within the Old and New Towns of Edinburgh World Heritage Site.

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

2.2 Site History

There is significant history relating to 35-36 St Andrew Square, for minor works that included signage; flagpoles; disabled access ramps; satellite dish and metal shutter. The applications below are for more substantive works:

- October 2005 - Works to listed building including construction of covered link building within the existing external basement area, erection of a traditionally finished outbuilding to house goods lift and refuse bins, reinstatement of original astragal configuration to window openings to south elevation, erection of external escape stairs to rear, and landscaping of existing car park area on bunker roof (all as amended) (application reference numbers: 05/02086/FUL and 05/02086/LBC) - Granted and constructed.
- January 2015 - Internal and external alterations including installation of new ATM, ATM surround and associated signage, advertisement signage, doors, lighting, new entrance lobby, new automation, removal of existing counters and replacement with new banking hall layout, as well as proposed painting and new flooring and other associated works (as amended) (application reference number: 14/04727/LBC) - Granted and constructed.
- May 2019 - Erection of music and performing arts venue with licensed café/restaurant and bar facilities, and related arrangements for infrastructure, demolitions, and other works (application reference number: 18/04657/FUL). This decision was the subject of a judicial review. The parties engaged in a process of mediation and agreement was reached on how to address the matters at dispute. On the basis of this agreement, the Court was invited to reduce the decisions of the council and to return the applications back to the council for further consideration and determination. This remains live and is awaiting determination.

- May 2019 - proposed demolitions, alterations, remodelling and erection of extension to the listed building (application reference number: 18/07730/LBC). This decision was the subject of a judicial review. The parties engaged in a process of mediation and agreement was reached on how to address the matters at dispute. On the basis of this agreement, the Court was invited to reduce the decisions of the council and to return the applications back to the council for further consideration and determination. This remains live and is awaiting determination.
- July 2019 - Applications submitted by TH Real Estate for the alterations to rear boundary wall to Elder Street to form vehicular access, use of part existing car park as construction site lay down area and other ancillary works for temporary period (application reference numbers: 18/01052/FUL and 18/01053/LBC) - withdrawn
- September 2019 - Application for listed building consent granted on 12 September 2019 for minor alterations to existing internal layout of main building and the removal of modern kitchen in single storey rear basement extension to form new music library (application reference number: 19/02941/LBC)
- June 2020- Application for listed building consent granted on 6 June 2020 for site boundary (rear wall) part demolition to allow site access to Elder Street, as part of future plans for IMPACT Dunard Centre Concert Hall (as amended) (application reference number: 20/01010/LBC)
- June 2020- Application for planning permission granted on 8 June 2020 for site boundary (rear wall) part demolition to allow site access to Elder Street, as part of future plans for IMPACT Dunard Centre Concert Hall (as amended) (application reference number: 20/01012/FUL)
- September 2020 - Application granted on 23 September 2020 to amend previous Listed Building Consent by adding 2 no. additional stone piers to wall for structural support (application reference number: 20/03355/LBC)

Main report

3.1 Description of the Proposal

In May 2019, The City of Edinburgh Council granted listed building consent for this site and also, planning permission and listed building consent for associated and linked scheme for 35 - 36 St Andrew Square (scheme two) for the proposed concert hall. These decisions were then the subject of a judicial review. The parties engaged in a process of mediation and agreement was reached on how to address the matters at dispute. On the basis of this agreement, the Court was invited to reduce the decisions of the Council and to return the applications back to the Council for further consideration and determination. All three applications, therefore, remain live.

As a consequence of the mediation process, the applicant has varied the design of the proposed development. Revised and updated drawings and plans, with full supporting documentation, were submitted to the council as Scheme Three. For the avoidance of doubt, these plans and drawings and the supporting information supersede the previous design which was granted listed building consent but subsequently reduced by the Court.

The application proposes the alteration of the garden boundary wall to the rear of 35 St Andrew Square; removal of modern garden structures including the demolition of the contemporary single storey outbuilding; and the lowering of the modern raised garden terrace and kitchen below.

It is proposed to remove the entirety of the sandstone ashlar boundary wall to the side (south) and also, the remaining rear (east) boundary wall and gate to where it abuts the contemporary, albeit traditionally finished, outhouse located within the north east corner of the rear garden.

The boundary walls delineate the original rear curtilage of the historic feu and are of a traditional construction and finish to the townhouse. However, they are not the original to the construction of the townhouse, having thought to have been erected in the 1960s. The walls are constructed in ashlar sandstone and reach a modest height in comparison to the boundary wall delineating the former rear garden area of the flanking pavilion townhouse at 37 St Andrew Square.

The proposals involve the removal of the basement kitchen; upper garden terrace; and the demolition of the outbuilding enabling the garden to revert back to its original level - in line with the level of the forecourt to Dundas House. This will allow for the incorporation of this section of the rear garden into the public realm and landscaping proposals associated with the wider redevelopment scheme. Within the new section of public realm, a change in material finish to the Yorkstone paving proposed within the wider scheme is proposed. A picked finish (rougher textured appearance) helps to subtly delineate the historic feu of 35 St Andrew Square whilst also enabling a seamless surface for drainage, vehicle overrun and pedestrian movement. Two new sections of walling with iron railings are to be erected to delineate the existing raised cast iron grille covered lightwell. The new walls will incorporate two to three polished ashlar sandstone courses with coping stones and railings.

Scheme Two

Scheme two only proposes very minor changes and will incorporate sandstone paving to define the line of the garden walls that are to be removed. Whinstone setts laid in different course, tree planters and seating are proposed to differentiate this area as the historic garden feu to 35 St Andrew Square from shared materials palette used to provide consistency with the wider public realm treatment for concert hall.

Supporting information

The assessment of this application for listed building consent has been informed by the Heritage Statement submitted in support of the application, and also other supporting information, including the Environment Impact Assessment (EIA) and Integrated Impact

Assessment (IIA) Reports, submitted as part of the associated detailed application for planning permission for the concert hall proposals.

An EIA Report was submitted in association with the linked detailed application for planning permission for the concert hall proposals, which scoped in three topic specific assessments: Cultural Heritage, Socio-Economics and Culture, and Townscape and Visual. An addendum to the EIA Report was submitted in February 2019 and August 2021. The EIA report including addendum is available for viewing under linked detailed application for planning permission (reference 18/04657/FUL) on the Planning and Building Standards Online Service.

The following documents were submitted in support of the application for listed building consent:

- Contextual Report;
- Design and Access Statement;
- Planning Statement and
- Heritage Statement

These documents can all be viewed on the Planning and Building Standards Online Service.

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.

The public sector equality duty under Section 149 of the Equality Act 2010 requires the Council, in the exercise of its functions (including determination of planning applications), to have due regard to the need to: -

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation are the 9 protected characteristics.

In determining applications for Listed Building consent in a conservation area, it is principally the HES Policy and guidance that the proposals should be assessed against. 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.

Having due regard to HES Policy and guidance, do the proposals:

- (a) harm a listed building or its setting?
- (b) conflict with the objective of preserving or enhancing the character or appearance of the conservation area?

If the proposals do comply with HES Policy and guidance, are there any compelling reasons (including but not limited to the public sector equality duty & development plan policies) for not approving them?

If the proposals do not comply with HES Policy and guidance, are there any compelling reasons (including but not limited to the public sector equality duty & development plan policies) for approving them?

3.3 Assessment

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

- a) The impact on the special architectural or historic interest of the listed building including its setting is acceptable;
- b) The proposals will preserve the character and appearance of the New Town Conservation Area;
- c) Impacts on equalities and rights are acceptable and
- d) Public comments have been addressed.

Section 14(2) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states:

'In considering whether to grant listed building consent for any works, the 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'.

The Historic Environment Policy for Scotland 2019 (HEPS) states:

HEPS sets out a series of principles and policies for the recognition, care and sustainable management of the historic environment and encourages consistent, integrated management and decision-making to support positive outcomes for the people of Scotland. By doing these things, HEPS helps to deliver the vision and aims of 'Our Place in Time'. It takes into account principles that the UK and Scottish governments have agreed to in international charters and conventions on cultural heritage and landscape.

The introductory paragraph in Historic Environment Scotland's (HES) 'Interim guidance on the principles of listed building consent' 2019 (GPLBC) identifies:

detailed guidance on the application of Historic Environment Policy for Scotland 2019 (HEPS) and sets out the principles HES recommends are followed in implementing the requirements of Scottish Planning Policy paragraphs 141 and 142. The GPLBC is a material consideration in the planning process and should be read alongside HEPS and the Managing Change Guidance Notes series.

The assessment on character and setting of the listed building and character and appearance of the conservation area have been informed by the Heritage Statement submitted in support of the listed building consent application, and also other supporting information, including the EIA Report, submitted as part of the associated detailed application for planning permission for the adjoining site at 36 St Andrew Square.

a) Impact on the special architectural and historic interest of the listed building including its setting

Method of assessment

For the purposes of assessing the impact of the proposals on the special interest and setting of the listed building, a two stage approach is required:

Stage 1:

Consideration should firstly be given to the relevant HES Managing Change Guidance to enable the identification of the impact on the listed buildings special architectural character and historic interest of the listed building including its setting.

The relevant HES Managing Change Guidance applicable to this assessment is:

1. Boundaries
2. Setting

Stage 2:

Should the impact on the buildings special interest, including its setting, be considered as adverse or significantly adverse, careful consideration must then be given to paragraph 15 of the GPLBC to assess the relative importance of the listed building; the scale of the impact on that special interest; other options which would ensure a continuing beneficial use for the listed building with less of an impact on its special interest; and whether there are significant benefits for economic growth or wider community which justify a departure from the presumption set out in paragraph 8 of GPLBC.

HES Managing Change in the Historic Environment: Boundaries -guidance

HES Managing Change in the Historic Environment: Boundaries guidance (Oct 2010) notes that:

'The layout and design of a boundary, its materials and method of construction, and the way in which it relates to other structures can be important elements of the character of a building or street, or contribute substantially to the sense of place and historical understanding of an urban landscape.'

The document notes that *'boundaries and their associated structures and fixtures often have formal design relationships with a building or garden / landscape'* and that *'the continuity or uniformity of a boundary can characterise a whole street or area of the same period, style, historical development or original ownership.'* As such the guidance refers to the design of boundaries to the rear that tend *'to be of high rubble walls with 'slaister' (widely spread) motoring and stone copes'*.

The proposed demolition works involve the removal of the ashlar sandstone walls across the side (south) and rear (east) boundaries and the complete demolition of the single storey outbuilding. Whilst traditional in design and appearance, with stone walls and simple pitched roof in slate, the outbuilding was recently erected and does not contribute to the special interest and character of listed building. Its removal would therefore, not affect the special architectural or historic interest of the listed building.

Although it is acknowledged that the stone boundary walls are not original having thought to have been constructed in the 1960s, they demarcate the original curtilage of the historic feu and therefore comprise an important element of the special architectural character and historic interest attributed to the listed building. As no replacement boundary structure is proposed along these boundaries, the layout of the buildings historic feu and the design of its curtilage wall to the rear will be lost. However, the loss would only generate a minor adverse impact on the sense of place and historical understanding of the listed building. Furthermore, the walls are considered to be non-original replacements and the public realm treatment has been purposely designed to demarcate the original layout. Taking these factors into account, the loss of the walls is considered to be acceptable.

The removal of the raised garden terrace reverts the rear curtilage back to its original level to match the forecourt of Dundas House and proposes a change in material finish to the Whinstone paving used within the wider scheme. A picked finish helps to subtly delineate and define the historic feu of 35 St Andrew Square whilst also enabling a seamless surface for drainage, vehicle overrun and pedestrian movement. The proposed addition of the dwarf walls and railings surrounding the existing lightwell allows light to reach the lower level of number 35 and retains a sense of the curtilage whilst also enabling visual continuity of the space between the existing buildings. The attachment of a planning condition is considered appropriate to ensure that its design and the materials it utilises are suitably reflective of its historic context.

Conclusion - HES Managing Change guidance on 'Boundaries'

While the removal of the outbuilding and garden roof terrace, including the levelling and treatment of the new surfaces, would return the rear curtilage to an appearance more akin to its original character, the loss of the traditionally finished stone boundary walls and the sense of enclosure to the rear curtilage they provide would impact on the special architectural character and historic interest that the category 'A' listed building possesses. However, the walls are not original to the construction of the townhouse with a sense of the original the rear curtilage of the historic feu maintained through the subtle delineation of curtilage walls and garden achieved through the surface materials and finishes utilised. On balance, given the careful articulation of the public realm and the non-original nature of the walls to be removed, the proposals will not adversely affect the special architectural character or historic interest of the listed building.

Historic Environment Scotland consultation response

Historic Environment Scotland (HES) do not object to the proposals. HES note the removal of the stone wall will impact on the established relationship between Dundas House and its flanking 'pavilions'. However, HES understand the rationale for its removal and note the sandstone strip paving detail that replaces it and marks out this historic boundary. HES are content that the proposals would not have a significant adverse impact on the special architectural character or historic interest of the listed buildings.

HES Managing Change in the Historic Environment - 'Setting' guidance

Historic Environment Scotland's document 'Managing change in the Historic Environment - Setting' states;

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

The document states that where development is proposed it is important to:

- *Identify the historic assets that might be affected;*
- *Define the setting of each historic asset and*
- *Assess the impact of any new development on this.*

HES's Historic Environment Policy 1 'Policy on understanding and recognition states *'to understand a place's cultural significance, we have to understand the place itself. This involves thinking about its physical and material elements - how much of it has survived or how much of it has changed through time, as well as its wider context and setting.*

The setting of a historic asset comprises our present understanding and appreciation of its current surroundings, and what (if anything) survives of its historic surroundings combined with subsequent historic changes.

HES Managing Change 'Setting' guidance Key Issue 1- 'Identify the historic assets that might be affected'

For the purposes of this listed building assessment, 35 St Andrew Square is the historic asset most directly affected. However, consideration is given to how the combination of 35, 36 and 37 St Andrew Square as a composition would be affected by the proposals.

HES Managing Change 'Setting' guidance Key Issue 2- 'Define the setting'

Wider setting

The existing setting of 35 St Andrew Square has changed from when it was originally constructed. As one of the first buildings in the First New Town it predates Dundas House (1771) and its twinned flanking townhouse at 37 St Andrew Square (1781). The combination of these three buildings create a set piece that, along with the forecourt of Dundas House, clearly defines their relationship to St Andrew Square on the principal George Street axis. The buildings now form part of a dense urban context as the square and surrounding built environment have been developed through time.

35 St Andrew Square is of primary significance in the composition of the site. Paired with its twinned pavilion building at 37 St Andrew Square, they flank Dundas House as the centrepiece. All three buildings help to provide a unified and distinct architectural composition that is clearly legible on both site and plan.

Immediate setting

Both 35 and 37 St Andrew Square retain the original curtilage of their historic feus. Their rear curtilages are easily appreciated from public views owing to the set-back of Dundas House and presence of its open forecourt. However, the depth and height of their rear curtilages and subsequent boundary treatments varies, with No. 37 extending to far greater depth and height.

However, the extent of this difference has been reduced with the recent addition of three further bays to the rear of No.37 to reduce the garden depth and match the rear building line of No.35 where three additional bays were added historically.

Notwithstanding this, the rear curtilage of their historic feus are retained and easily observable. The way in which their rear curtilages relate to each other and the forecourt of Dundas House as a unified and distinct architectural composition comprise important elements of the character of the listed buildings, street and contribute substantially to the sense of place and our understanding of this historic urban landscape.

HES Managing Change 'Setting' guidance Key Issue 3 -'Evaluate the potential impact of the proposed changes'

Of great importance to the setting of 35 St Andrew Square is its relationship with its twinned pavilion townhouse and their compositional contribution in framing Dundas House including its forecourt. In certain views an element of the relationship between these buildings will be affected in an adverse manner by the removal of the boundary wall.

The most significant impact would be on some of the close views from within forecourt of Dundas House and on the east side of St Andrew Square, from the public footway, where the boundary wall of 35 St Andrew Square can be clearly seen to demarcate the historic feu of the listed building. This helps created a strong relationship between the three buildings and affords Dundas House a degree of prominence. As this relationship is eroded, so too is an element of what affords Dundas House its prominence. However, when viewed from a greater distance away, the visibility of boundary wall is reduced given its level and position within the site. The presence of heavily detailed cast iron railings and gates fronting the forecourt to Dundas House further limits its visibility from out with the Dundas House's site and the impact is considered negligible.

Conclusion

Although there is a recognised impact on the immediate setting of 35 St Andrew Square; its setting relationship with its twinned pavilion townhouse; and their compositional contribution in framing Dundas House including its forecourt, the impact is not the same from out with the site within St Andrew Square and in longer views. The proposed public realm treatment to subtly demarcate the original feu further mitigates this overall impact. It is therefore concluded, that overall and on balance, the removal of the walls will not adversely affect the setting of the listed building.

Historic Environment Scotland consultation response

Historic Environment Scotland (HES) do not object to the proposals. HES is content that the direct physical interventions proposed to the listed buildings would not harm their special architectural character or historic interest. HES does however, make reference to the removal of the stone wall and its subsequent impact on an established relationship between Dundas House and its flanking 'pavilions', but, understand the rationale for its removal. HES also notes, the sandstone strip paving detail that replaces it and marks out the historic boundary.

Overall Stage 1 Assessment - HES Managing Change Guidance on 'Boundaries' and 'Setting'

While the removal of the outbuilding and garden roof terrace, including the levelling and treatment of the new surfaces, would return the rear curtilage to an appearance more akin to its original character, the loss of the traditionally finished stone boundary walls and the sense of enclosure they provide to the rear curtilage would be lost. However, the walls are not original to the construction of the townhouse with a sense of the original rear curtilage of the historic feu maintained through the subtle delineation of curtilage walls and garden achieved through the surface materials and finishes utilised.

On balance, the scale of this impact on the listed building is therefore acceptable and will not adversely affect its special architectural character or historic interest.

The removal of the rear curtilage walls would also impact on the immediate setting of 35 St Andrew Square by removing the sense of enclosure to its rear setting and diluting the historic understanding of its rear setting. However, the impact is not the same from out with the site within St Andrew Square and in longer views. The proposed public realm treatment to subtly demarcate the original feu further mitigates this overall impact. It is therefore concluded, that overall and on balance, the removal of the walls will not adversely affect the setting of the listed building.

Stage 2 Assessment

Having addressed the points in the Managing Change Guidance, overall and on balance, the proposals will not generate an adverse impact on the special interest of the listed building including its setting. In the event that the Development Management Sub-Committee conclude that the negative presumption is engaged, it will be necessary to consider whether the presumption can be rebutted. As such, consideration must be given to paragraph 15 of Historic Environment Scotland's 'Interim Guidance on the Principles of Listed Building Consent' (GPLBC) that states *Where a proposal involves alteration or adaptation which will have an adverse or significantly adverse impact on the special interest of the building, planning authorities, in reaching a decision should consider carefully:*

- a) *The relative importance of the special interest of the building and*
- b) *The scale of the impact of the proposals on that special interest and*
- c) *Whether there are other options which would ensure a continuing beneficial use for the building with less impact on its special interest and*
- d) *Whether there are significant benefits for economic growth or the wider community which justify a departure from the presumption set out in paragraph 8*

HESPS Point a - 'Special interest'

35 St Andrew Square is a nationally important building. It is one of the finest Georgian houses, built by James Craig to a design by Robert Adam, and one of the earliest buildings in the New Town. Built in accordance James Craig's New Town plan, it sits slightly off-centre with the axis of George Street in a significant location within the New Town and World Heritage Site. It is a symmetrically designed classical Georgian townhouse that, despite continuous changes to the surrounding built environment, retains a significant presence on St Andrew Square by virtue of its design. Together with its twinned pavilion townhouse at 37 St Andrew Square, they flank Dundas House and forecourt which, as a composition, create an important set piece and comprises a very significant surviving part of the original fabric of Edinburgh's New Town. 35 St Andrew Square contributes considerably to the townscape of the New Town Conservation Area and Old and New Towns of Edinburgh World Heritage Site.

The building is of national importance as a listed building of special architectural and historic interest.

HESPS Point b - 'Scale of impact'

While the removal of the outbuilding and garden roof terrace, including the levelling and treatment of the new surfaces, would return the rear curtilage to an appearance more akin to its original character, the loss of the traditionally finished stone boundary walls and the sense of enclosure to the rear curtilage they provide would impact on the special architectural character and historic interest that the category 'A' listed building possesses. However, the walls are not original to the construction of the townhouse with a sense of the original the rear curtilage of the historic feu maintained through the subtle delineation of curtilage walls and garden achieved through the surface materials and finishes utilised. On balance, given the careful articulation of the public realm and the non-original nature of the walls to be removed, the scale of the impact on the special architectural character or historic interest of the listed building is not considered adverse.

Although there is also, a recognised impact on the immediate setting of 35 St Andrew Square; its relationship with its twinned pavilion townhouse; and their compositional contribution in framing Dundas House including its forecourt, the impact is not the same from out with the site within St Andrew Square and in longer views. The proposed public realm treatment to subtly demarcate the original feu further mitigates this overall impact. It is therefore concluded, that overall and on balance, the scale of this impact on the setting of the listed building is not considered adverse.

Furthermore, the removal of the wall is required to facilitate adequate suitable access to the new concert hall to the rear of 36 St Andrew Square and helps create a public realm to accommodate seating and dwell space to assist the legibility and function of the wider scheme for the concert hall.

It can therefore be concluded, that overall and on balance, the scale of impact on the special architectural and historic interest of the listed building including its setting is not considered adverse.

HESPS Point c - 'Other options for Use of the Building'

The site is currently used as offices by IMPACT Scotland and will also be used by the Scottish Chamber Orchestra as their Headquarters. Whilst the retention of the boundary walls would not prohibit their use of the building for offices, the proposals must be considered within the context of the wider scheme for the concert hall and its associated public realm improvements as discussed in point d below.

HESPS Point d - 'Significant Benefits'

Paragraph 8 of the GPLBC states that there is a *presumption against demolition or other works that adversely affect the special interest of a listed building or its setting.*

The applicant has submitted a Socio-Economic and Cultural Impact Assessment to support the corresponding application for planning permission for 35-36 Dundas House, a topic which was also scoped into the EIA Report and fully assessed within the report of handling associated with the application for planning permission.

The proposed development is fully endorsed by the Council's Culture Service. It also forms an important cultural strand within the City Deal, unlocking £25million of strategic match funding from all levels of government and has significant financial backing and under-pinning from a private philanthropic donor. As the first new performance venue to be built in Edinburgh in a century, this new development will represent a significant addition to the city's cultural infrastructure and will signal Edinburgh's success as a Festival City and its ambitions in the creative and cultural industries.

The cultural and wider community benefits to the city, region and nation, brought about as a result of the proposed development and the opportunities for advancement it provides, are acknowledged and supported in the EIA Report.

The report of handling for the detailed application for full planning permission for 36 St Andrew Square sets out the benefits the proposal brings to the City and contends that the use would make an exceptionally positive contribution towards the City's cultural, social and educational provision/ This exceptional level of benefit helps set out a compelling case for justifying a departure from the presumption set out in paragraph 8 of GPLBC.

Notwithstanding these significant cultural and community benefits, a crucial element of the wider proposals include a comprehensive public realm and landscaping strategy that should be considered in relation to these proposals.

Stage two assessment conclusion

In light of the considerations detailed within paragraph 15 (points a - d) of the GPLBC, which concerns the assessment of the scale of individual adverse impacts on the special interest of a listed building including its setting, it is found that consideration of the points b) and d) of this are of specific relevance to the assessment of the proposals. Overall and on balance, the scale of the impact (point b) on the listed building is judged to not adversely affect its special interest including its setting and the cultural and wider community benefits (point d) brought about as a result of proposals would make an exceptionally positive contribution towards city's cultural, social and educational provision.

In conclusion, should the negative presumption have been engaged by the Development-Sub Committee following the consideration of the conclusions drawn from the stage one assessment, the proposals would allow a departure from the presumption set out in paragraph 8 of the GPLBC in accordance with points b) and d) of paragraph 15 of the GPLBC (2019) and as such, would adequately rebut the negative presumption.

The proposals are therefore judged to be in accordance with Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

(b) Impact on the special character and appearance of the New Town 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 site is located within the New Town Conservation Area. The essential characteristics of the Conservation Area as identified through the New Town Conservation Area Character Appraisal include:

- the formal plan layouts, spacious stone built terraces, broad streets and an overall classical elegance;
- views and vistas, including axial views along George Street;
- terminated vistas have been planned within the grid layouts, using churches, monuments, buildings and civic statutory, resulting in an abundance of landmark buildings. These terminated vistas and the long distance views across and out of the Conservation Area are important features;
- grand formal streets lined by fine terraced building expressing neo-classical order, regularity, symmetry, rigid geometry, and a hierarchical arrangement of buildings and spaces;
- within the grid layouts, there are individual set pieces and important buildings that do not disturb the skyline;
- the setting and edges of the New Town and Old Town;
- the extensive collection of statues, monuments, historic graveyards and national memorials in the Conservation Area make a significant contribution to the historic and architectural character of the area. They also provide a focus and punctuation points for many views;
- boundaries are important in maintaining the character and quality of the spaces in the New Town. They provide enclosure, define many pedestrian links and restrict views out of the spaces. Stone is the predominant material; and
- new development should be of good contemporary design that is sympathetic to the spatial pattern, scale and massing, proportions, building line and design of traditional buildings in the area

Wider views

The established spatial hierarchy of the First New Town plan is a key characteristic of the conservation area. The historic plan forms, allied to the dramatic topography, results in important, terminated and long vistas with landmark features. It is the views along George Street towards St Andrew Square that contribute to the clarity of the urban structure of the planned First New Town and alignment of key buildings and spaces. Whilst the rear curtilage wall lies adjacent to this centrally aligned axis, to the north of Dundas House's forecourt, it is not possible to view or interpret the rear curtilage from wider views from St Andrew Square Gardens or along George street owing to its set-back position within the site and the solidity of the highly detailed cast iron railings and gates to the St Andrew Square frontage of Dundas House.

Localised Views

Within the forecourt of Dundas House, the delineation of the rear curtilage by the stone wall is clearly visible and easily interpreted as the historic feu of 35 St Andrew Square.

The impact from this location on the special character and appearance of the conservation area is more significant as the demolition of the boundary wall will remove strong physical evidence of the rear curtilage of the historic feu arrangement. The proposals would therefore disrupt the continuity and uniformity that characterise original ownership and the ridged and ordered urban structure that contribute to the special character and appearance of the New Town Conservation Area.

Impact on group composition - 35 - 37 St Andrew Square

The stone wall delineates the forecourt and front curtilage of Dundas House together with the rear curtilage of 35 St Andrew Square and therefore contributes to the special compositional character of 35 St Andrew Square, its twinned flanking pavilion townhouse and Dundas House with its forecourt as its centrepiece. As this arrangement is one of the few surviving original architectural compositions on the square, the proposals will undoubtedly dilute the strong arrangement of spaces around these buildings and disrupt the urban composition that characterises original ownership and this unique part of the First New Town. However, this is mitigated by the solidity of the tall cast iron railings and gates along the St Andrew Square frontage of Dundas House to obscure clear views of the rear curtilage from public footway along the east side of St Andrew Square.

Conclusion

Overall, and on balance, the removal of the walls will generate a limited impact on the special character and appearance of the New Town Conservation Area. A sense of the original rear curtilage of the historic feu will be maintained through the subtle delineation of curtilage walls and garden through the surface materials and finishes utilised mitigating minor adverse impacts such that the overall all impact is neutral. The proposals therefore, do not remove or detract from key characteristic components of the conservation area that gives the area its special interest.

The proposals are in accordance with Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

c) Impacts on equalities and rights are acceptable

The public sector equality duty under Section 149 of the Equality Act 2010 requires the Council, in the exercise of its functions (including determination of applications for planning permission and listed building consent), to have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation are the 9 protected characteristics.

An Integrated Impact Assessment (IIA) has been carried out and is viewable on the Planning and Building Standards Online Services under the application for planning permission for the adjoining site.

The removal of the walls and opening up of the site will create a high quality environment offering level access with accessible facilities and will have a positive impact on disabled users. The site is very accessible by a range of public transport methods, including the tram which offers good disabled facilities. The public realm created within the former garden area will improve the legibility of the wider concert hall site including its entrances and will accommodate public seating and dwell space accessible to all.

There are positive impacts on equalities and human rights arising from the creation of a high-quality environment in a highly accessible location. The proposals will generate positive equalities benefits to many different populations including the young, old and disabled.

d) Public representations have been addressed

Material issues raised in objection to scheme three

- Concern over the number of inaccuracies contained within the Heritage Statement. Adequate information has been provided to make an informed judgement and assessment of the application

Non material issues raised in objection to scheme three

- Concern over the management of the construction stage including structural damage to Dundas House and neighbouring listed buildings. This is particularly the case given the proximity of the new development with its neighbours. - Such controls are not regulated under planning legislation. Construction issues will be managed and controlled through a Construction Management Plan that will be developed with the appointed contractor at the appropriate time. An informative relating to the Construction Management Plan has been attached to the associated detailed application for planning permission

Material comments raised in support to schemes one and two

- Positively contribute to the cultural offer of not just Edinburgh, but of Scotland helping to attract visitors which will benefit the wider economy. Addressed in 3.3a).
- Public benefits of the proposals outside of performance time given the provision of function spaces, café, foyer and crown walkway as publicly accessible spaces within the scheme. Addressed in 3.3a).

Non material comments raised in objections to schemes one and two

- Comments related to the applications for planning permission and listed building consent associated with 35-36 St Andrew Square (Dundas House) and not to the proposals detailed in this application.

Conclusion

Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997

While the removal of the outbuilding and garden roof terrace, including the levelling and treatment of the new surfaces, would return the rear curtilage to an appearance more akin to its original character, the loss of the traditionally finished stone boundary walls and the sense of enclosure to the rear curtilage they provide would impact on the special architectural character and historic interest that the category 'A' listed building possesses. However, the walls are not original to the construction of the townhouse with a sense of the original the rear curtilage of the historic feu maintained through the subtle delineation of curtilage walls and garden achieved through the surface materials and finishes utilised. On balance, given the careful articulation of the public realm and the non-original nature of the walls to be removed, the scale of the impact on the special architectural character or historic interest of the listed building is not considered adverse.

Although there is also, a recognised impact on the immediate setting of 35 St Andrew Square; its setting relationship with its twinned pavilion townhouse; and their compositional contribution in framing Dundas House including its forecourt, the impact is not the same from out with the site within St Andrew Square and in longer views. The proposed public realm treatment to subtly demarcate the original feu further mitigates this overall impact. It is therefore concluded, that overall and on balance, the scale of this impact on the setting of the listed building is not considered adverse.

Furthermore, the removal of the wall is required to facilitate adequate suitable access to the new concert hall to the rear of 36 St Andrew Square and helps create a public realm to accommodate seating and dwell space to assist the legibility and function of the wider scheme for the concert hall.

While it is considered that the proposed development does not comply fully with the provisions of the HES Managing Change in the Historic Environment guidance in terms of the 'Boundaries' and 'Setting' series, the scale of the impact on the special interest of 35 St Andrew Square including its setting is not considered adverse.

In the event that the Development Management Sub-Committee does not agree with this assessment and concludes that the negative presumption is engaged, consideration was given to paragraph 15 of Historic Environment Scotland's 'Interim Guidance on the Principles of Listed Building Consent' (GPLBC) to assess whether the presumption can be rebutted.

Overall and on balance, the scale of the impact (point b of the GPLBC) on the listed building is judged to not adversely affect its special interest including its setting and the cultural and wider community benefits (point d of the GPLBC) brought about as a result of proposals would make an exceptionally positive contribution towards city's cultural, social and educational provision. The proposals would therefore, allow a departure from the presumption set out in paragraph 8 of the GPLBC in accordance with points b) and d) of paragraph 15 of the GPLBC (2019) and as such, would adequately rebut the negative presumption.

Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997

The removal of the walls will generate a limited impact on the special character and appearance of the New Town Conservation Area. A sense of the original rear curtilage of the historic feu will be maintained through the subtle delineation of curtilage walls and garden through the surface materials and finishes utilised mitigating minor adverse impacts such that the overall all impact is neutral. The proposals therefore, do not remove or detract from key characteristic components of the conservation area that gives the area its special interest.

It can therefore be concluded, that the proposals are in accordance with Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

Material considerations

There are positive impacts on equalities and human rights arising from the creation of a high-quality environment in a highly accessible location. The proposals will generate significant positive equalities benefits to many different populations including the young, old and disabled.

There no material considerations including equalities or human rights that would justify a contrary decision.

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

3.4 Conditions/reasons/informatives

Conditions :-

1. Comprehensive details of the design and materials specifications of the new boundary wall and railings shall be submitted to and approved by the Planning Authority prior to commencement of over-ground works on site.

Note: The boundary wall shall be constructed from ashlar sandstone with rounded copes and appropriately 'Georgian' detailed cast iron railings, painted black and slotted individually into the stone wall.

2. Where the concert hall, as consented under parallel planning application reference 18/04657/FUL is not occupied within 5 years of the commencement of development of the concert hall (including demolitions), or an alternative timescale agreed in writing by the Planning Authority, the boundary wall shall be reinstated in stone to the satisfaction of the Planning Authority.

Reasons:-

1. In order to safeguard the character of the statutorily listed building.
2. To ensure that the wider benefits, which justify the demolition of the boundary wall, are delivered

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.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. Any proposed signage requires advertisement consent and depending on the location, may require Listed Building 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 section 3.3c) of the Assessment section of the main report.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

The parallel detailed application for planning permission (ref: 1804657/FUL) meets the sustainability requirements of the Edinburgh Design Guidance.

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on the proposals. As part of the pre-application process, the proposal was also presented to the Edinburgh Urban Design Panel on 27 September 2017. The comments have been considered in the assessment of this application and are contained in full within Appendix 1.

8.2 Publicity summary of representations and Community Council comments

The application was advertised on 14 September 2018, with 21 days allowed for comments. The application also appeared in the Weekly List on 11 September 2018.

The proposals that formed scheme one received two letters of objections, and one letter of support. This included comments from the following amenity body:

- The Architectural Heritage Society of Scotland

All the interested parties who had previously commented on scheme one were re-notified on 27 February 2019, with 14 days allowed for comments. No further representations were received.

All interested parties who previously commented were re-notified of Scheme Three on 3 September 2021, with 21 days allowed for comments. One further representation was received.

The comments received have been considered in the assessment of the application. An assessment of these representations can be found in the main report in section 3.3d).

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 application site is shown to be within the City Centre as defined in the Edinburgh Local Development Plan (LDP).

Date registered

5 September 2018

Drawing numbers/Scheme

01-02, 03A, 05-10, 12-14, 18A, 20A, 24-47,

Scheme 2

David Givan

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Daniel Lodge, Planning officer

E-mail: daniel.lodge@edinburgh.gov.uk

Links - Policies

Relevant Policies:

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

Relevant Government Guidance on Historic Environment.

HES Interim Guidance on Conservation Area Consent sets out Government guidance on the principles that apply to the demolition of unlisted buildings in conservation areas

Managing Change in the Historic Environment: Boundaries sets out Government guidance on the principles that apply to altering boundary treatments of listed buildings.

Planning Advice Note 71 on Conservation Area Management recognises conservation areas need to adapt and develop in response to the modern-day needs and aspirations of living and working communities.

Managing Change in the Historic Environment: External Fixtures sets out Government guidance on the principles that apply to altering the external fixtures of listed buildings.

Managing Change in the Historic Environment: External Walls sets out Government guidance on the principles that apply to altering the external walls of listed buildings.

Managing Change in the Historic Environment: Setting sets out Government guidance on the principles that apply to developments affecting the setting of historic assets or places.

Relevant policies of the Edinburgh City Local Plan.

LDP Policy Env 3 (Listed Buildings - Setting) identifies the circumstances in which development within the curtilage or affecting the setting of a listed building will be permitted.

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

World Heritage Site

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

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

Relevant Non-Statutory Guidelines

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.

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

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

Appendix 1

Application for Listed Building Consent 18/07127/LBC at 35 St Andrew Square, Edinburgh, EH2 2AD Demolition of boundary wall, modern basement kitchen, rear extension, and outbuilding within existing rear garden, regrading of land, erection of new boundary features and public realm.

Consultations

Historic Environment Scotland - Scheme Three response dated 01/10/2021

Thank you for your consultation which we received on 03 September 2021. We have considered it and its accompanying EIA Addendum in our role as a consultee under the terms of the above regulations.

The proposals

The proposals consist of a new music and performing arts venue to the rear (east) of the existing Dundas House, largely on the site of the existing 1960s office block, previously erected as an extension to Dundas House. The current consultation consists of one planning application and two listed building consent applications, accompanied by an Environmental Impact Assessment Report Addendum.

In relation to both the planning application and the EIA consultation, our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories.

We have a separate remit regarding listed building consent, concerning works to Category A and B listed buildings, demolition, and applications by planning authorities. For this reason, we have separated our advice into three sections, one under each set of regulations. As there are two listed building consent consultations, we have stated our position separately for each.

You should also seek advice from your archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

The proposals are a variation to a previously proposed new music venue at 35-36 St Andrew Square. The key alteration for our interest is the reduction in scale and massing of the proposed extension to Dundas House. It is likely that it will be helpful to refer to our detailed response to the originally proposed scheme, dated 15 January 2019.

Listed building consent

18/07127/LBC and 18/07730/LBC

We are content that the direct physical interventions proposed to the two listed building consent applications would not harm the special interest of Dundas House. We do not object to the applications.

Our detailed comments on these applications are given in Annex 1 of this letter.

Planning application 18/04657/FUL

The impacts of the currently proposed scheme are likely to be less significant than the previous scheme, as the scale of the development has been reduced. We have identified some adverse impacts from the scheme, but we are content that none of these impacts raise issues in the national interest. We therefore do not object to the proposals.

Our detailed comments on the planning application are given in Annex 2 of this letter.

Environmental Impact Assessment

We are content that sufficient information has been provided to come to a view on the planning application. We are content with the scope of the assessment and its methodology.

We have comments on the assessment itself and its conclusions. These are given in Annex 3 of this letter.

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.

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 development affecting the historic environment, together with related policy guidance.

Further Information

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

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at www.engineshed.org

Annex 1 - Listed building consents

Your Council has consulted us in relation to works to two Category A listed buildings, which include the potential impacts on their setting. However, we have concentrated on assessing the physical impact on the listed building in Annex 1, and the setting of the listed building through the planning application process in Annex 2.

We commented on the previous proposals for the site in January 2019.

18/07127/LBC - Application for listed building consent for associated proposed works, including demolitions, new boundary treatment and public realm (35 St Andrew Square)

Although the removal of the stone wall affects an established relationship between Dundas House and its flanking 'pavilions' we understand the rationale for its removal. We note the sandstone strip paving detail that replaces it and marks out this historic boundary. Any opportunities to salvage and reuse the stone walling (on or off site) would be welcomed.

18/07730/LBC - Application for listed building consent for proposed demolitions, alterations, and extension (Dundas House, 36 St Andrew Square)

Demolition

As before, the proposed demolition works primarily involve the loss of the 1960s office block by Glasgow architects Gratton & McLean. We do not consider that this block contributes to the special interest of Dundas House, and therefore do not object to its loss. There are also a series of more minor alterations and removals of later extensions to Dundas House. Similarly, these will not result in harm to the special interest of the listed building. Again, opportunities to salvage materials could be taken. We would suggest that the application process has included sufficient record information on the demolished elements on the site.

Extension

The extension, to form the proposed new music venue, is planned to connect with the rear facade of the banking hall, itself a mid-C19th extension to the original Dundas House by the architect John Dick Peddie. This rear elevation, already linked to the C20th block is relatively restrained in design and has been previously altered by extensions. We are content with the manner of the link between the old and new buildings and note a section of the existing rear elevation stonework would be exposed internally as a feature within the new music venue.

In contrast to the relatively concealed 1960s block it would replace, the proposed new structure would rise above Dundas House and expand beyond it to the rear on both its north and south sides. The current proposals, though still significant in scale, are much reduced from the previous proposals we commented on in 2019.

Our Managing Change guidance note on Extensions states that extensions to historic buildings should ordinarily be subordinate in both scale and form. The proposals would be contrary to the advice offered by this guidance.

However, due to the urban location and the enclosed and constrained site at the rear of Dundas House, the new music hall does not immediately read as an extension. We

consider its major impact would be on the setting of Dundas House. We have therefore assessed this setting in our response to the planning application, with reference to our relevant Managing Change guidance on Setting. (See Annex 2.)

Alterations

Externally, the proposals involve alterations and remedial works to the listed building, mainly towards the rear. Here it is proposed to alter or infill several, now obsolete, openings and tidy up services. We welcome the designs to replicate a recessed blank or dummy window in the architectural/historic openings within the rear façade of Dundas House. In other locations later openings in the walling are to be infilled with flush stonework.

Internally, there is a new door proposed from the rear of the 1858 banking hall to the new extension. Although, a completely new opening, it is designed traditionally. We consider this is an appropriate response in this instance, due to the quality of the space. However, care should be taken with the proposed stone threshold as the banking hall retains its original 1858 highly decorative Minton tiled floor largely intact underneath the modern carpet. It is hoped that this tiled floor could be revealed again in the future.

The existing 'cash cage' structure is to receive a new rear wall. We have no concerns with this, but any additional servicing should, again, protect the floor, and allow for the structure to be removed easily in the future.

We assume the blocked door to the north of the new link door (with the proposed new stair behind) will be blocked on the stair side, with its door retained facing the hall.

As before, we are pleased to note that there are no proposals to alter the 19th century ornamental cast-iron-railed screen and gates enclosing the front forecourt on St Andrew Square. Again, we would urge that the current proposals for vehicle access are appropriately managed, to ensure there would be no potential damage or disturbance to the listed gatepiers, gates, railings, statue and lamp standards.

Conclusion

We are content that the direct physical interventions proposed within the two listed building consent applications would not harm the special interest of Dundas House.

We consider that the proposals for the music hall extension (application 18/07730/LBC) would not conform to our guidance on extensions to historic buildings. However, due to the constrained urban site we consider the more significant impacts will be on the setting of the building.

As explained in Annex 2, we consider the proposals would have an adverse impact on the setting of Dundas House, affecting some key views of the Category A listed building, especially from St Andrew Square. However, these impacts are much reduced from the scheme we commented on in 2019, and we do not consider, as before, they are significant enough to merit an objection.

Annex 2 - Planning Application

The planning application seeks consent for erection of music and performance arts venue licenced café/restaurant and bar facilities, and related arrangements infrastructure, demolitions and other works. The proposed location is at 35-36 St Andrew Square, Edinburgh.

Our interests in the planning process are set out in our covering letter above. In this specific instance, your Council has consulted us for the following reasons:

- o The development may affect a category A listed building or its setting.*
- o The development (which is other than householder development) may affect a World Heritage Site (WHS).*

We have reviewed the information provided and have focussed our comments on those heritage assets where we consider there may be a significant impact. These are as follows:

- o category A listed building 36 St Andrew Square, Dundas House*
- o category A listed building 35 St Andrew Square*
- o category A listed building 37 St Andrew Square*
- o Outstanding Universal Value (OUV) of The Old and New Towns of Edinburgh WHS*

Other impacts on our interests do not appear likely to be significant. Direct physical impacts on 35 St Andrew Square and Dundas House are considered above in our comments on LBC.

In the context of the proposed development, the key characteristics of the settings of 35 and 37 St Andrew Square is their appearance as part of an architectural composition with Dundas House. We have therefore commented on these in our consideration of the setting of Dundas House. We note that the EIA Addendum considers the impacts on 35 and 37 to be negligible (5.10.45 and 5.10.50).
Dundas House

The assessment considers the operational effect on Dundas House to be minor beneficial (5.10.39). No statement is made as to whether this impact is considered significant.

The assessment identifies impacts on three key characteristics of the setting of Dundas House:

- o Views of the entrance court and the building's country house aesthetic*
- o Alignment with George Street and the primacy of the façade in views along this axis*

We agree that these are key characteristics of the setting of the building that contribute to its cultural significance.

In looking at the setting of the A listed buildings we have assessed the potential impacts using our Managing Change guidance on 'Setting'. This sets out a three-step methodology for assessing applications:

1. *identify the historic assets*
2. *define and analyse the setting*
3. *evaluate the potential impact of the proposed change*

The historic asset

Clearly the main asset is the Category A listed Dundas House, a freestanding symmetrical villa, in a setback position on St Andrew Square. The Category A listed building was designed by the noted architect Sir William Chambers as a townhouse, although its important site was originally intended for a public building.

Dundas House was specifically constructed in an axial position to George Street, behind a front railed forecourt and oval carriage drive, its design giving it the impression of a small country mansion. It has an important compositional relationship with the listed buildings at No.35 and No.37 St Andrew Square, the latter designed to match No.35 and thus appear as flanking pavilions to Dundas House.

Define and analyse the setting

We assessed the setting of Dundas House in detail in our response to the previous application. To recap, Dundas House is a distinct architectural composition placed in a set-back position on the square. It has a clearly defined relationship to St Andrew Square, enhanced by its twinned flanking 'pavilions'. Dundas House also makes an important contribution to the formal grid plan of the first New Town, as an original (first generation) surviving set-piece development on the east side of St Andrew Square, centred on the principal axis of the first New Town, George Street.

The setting and symmetry of Dundas House and its pavilions can be appreciated in a range of axial views, including from within the square, and from the eastern end of George Street. However, due to the scale of Dundas House on its site, (which, as above, was originally intended to be occupied by a public building), the position of the A listed Melville Monument, and over two centuries of development, it is not a dominant feature in views along the length of George Street. Nevertheless, Dundas House does make a key contribution to our understanding of this element of the first New Town grid plan, and its relationship with its pavilions and St Andrew Square remains clearly legible. This composition can be best appreciated from the eastern side of the Square (to the immediate east of the Melville Monument).

In considering the original application we assessed the proposals against the planned scheme for the St James Centre, including the new hotel (W Edinburgh) which is centred on the axial arrangement of both George Street and Dundas House. This development is now largely completed with the scale of the development clearly visible in a series of views.

Evaluate the impact

Our previous comments in January 2019 considered the impact of the development on the setting of Dundas House in a series of views from west to east. In longer views we considered the development would integrate itself as an additional layer of townscape,

although there was a more significant impact in closer views, and a significant adverse impact when seen from the eastern side of St Andrew Square.

In the current proposals, the height of the new development has been significantly reduced. We consider the setting of Dundas House would again be integrated with the townscape in longer views, against the backdrop of the St James Square and hotel development. In closer views the new building will remain visible, but any impact on its setting would be reduced.

The main difference from our comments in 2019 is the lesser impact on closer views of the development, from the eastern side of St Andrew Square. The development will still be visible above the roofscape of Dundas House, unfortunately losing the building's current silhouette against the skyline in a series of viewpoints. However, this adverse impact is much reduced from the previous proposals.

In views of Dundas House from the adjoining pavement, beside the front entrance railings, and gateways, the impact of the proposals would be minimal, preserving the existing relationship Dundas House has with the Square and its flanking pavilions. The only alteration to the existing composition will be the removal of the boundary wall of number 35.

Conclusion

Our main concern with the previous proposals was the impact caused by the height and scale of the proposed new building on the setting of Dundas House. Much of our pre-application discussions centred on finding solutions to reduce the height and scale of the new development.

The current proposals have reduced the height of the development from the previous scheme. Although there would still be adverse impacts on the setting and understanding of Dundas House and its pavilions from some viewpoints, they would be less significant than those envisaged in the previous proposals. We do not consider the proposals raise issues of national interest, such that we would object.

The Old and New Towns of Edinburgh WHS

The EIA report considers the impact on the WHS to be moderate beneficial (5.10.23). No statement is made as to whether this impact is considered significant. We note that the assessment considers impacts on the attributes of both architectural quality and on the cultural life of the city to be beneficial.

The assessment of impact on architectural quality also considers impacts on Dundas House in its current setting. As above, we have identified adverse impacts on the setting of Dundas House. We therefore disagree with the conclusion that the impact is entirely beneficial.

The reduction in the scale of the proposal in the design process since the original application is likely to reduce the visual impact on Dundas House and this area of the WHS.

The impacts on the cultural life of the city are unlikely to be altered by the changes. Our letter on the original scheme sets out our position on this.

On this basis, it is likely that any adverse impacts previously identified on the WHS will be reduced overall. We are content that the overall impact is unlikely to be significant for our interests.

Conclusion

The impacts of the currently proposed scheme are likely to be less significant than the previous scheme, as the scale of the development has been reduced. We are content that none of these impacts raise issues in the national interest. We therefore do not object to the proposals.

Annex 3 - EIA Report

This annex gives our comments on the Environmental Impact Assessment (EIA) of the proposals. Historic Environment Scotland is a named Consultation Body in the EIA Regulations. Our interests are as set out in the covering letter above, and in line with our interests in the planning process.

We are content that sufficient information has been provided in the EIA Report to come to a view on the application. We consider the scope of the assessment adequate and welcome the inclusion of specific supporting visualisations for our interests.

Structure and content

The information in the EIA Report is detailed and clearly explained. The supporting information, particularly the cultural heritage viewpoints, have been very helpful for us in considering the potential impacts of the development.

The large number of documents, including a Heritage Appraisal and other technical appendices, as well as a separate Heritage Statement with its own appendices. This makes it quite difficult to navigate all of the information, particularly when looking at the reports online, as most people will in the current circumstances.

The number of different reports could generate some confusion, particularly where more than one assessment is presented as considering impacts on cultural heritage. It helps significantly that conclusions are only presented in the relevant chapter of the EIA Report, and we welcome this.

The methodology given states that whether an impact is considered significant is a matter of professional judgement and we agree that this the case. It would have been helpful if the assessment presented conclusions on this, particularly as we would ordinarily expect a significant effect to be a trigger to consider further mitigation measures. We note that no further mitigation has been identified.

While it would not have formed part of the EIA itself, it may have been helpful for interested parties to see different design iterations side by side. While the difference in the scheme is explained in the text, the changes are complex and some form of further aid to their understanding would probably be welcomed by many.

Methodology

We welcome the fact that the EIA Chapter on Cultural Heritage makes reference to our Managing Change guidance series and other relevant policy and guidance. The methodology set out is clear and allows space for professional judgement without being overly prescriptive.

Some of the references given in the original EIA Report have not been changed and are now out of date. In particular, it is important that the Historic Environment Scotland Policy Statement is no longer relevant, and that national policy for the historic environment is given in the Historic Environment Policy for Scotland (HEPS).

There is also no reference to the EIA Handbook, and we consider this a key document in setting out best practice for assessing historic environment impacts in the EIA process. The EIA Handbook sets out an approach to assessment focussing on impacts on cultural significance, and this allows for a simpler more focussed methodology than that given. However, we are content that the principles of the methodology used are appropriate for our interests.

Assessment

We note that the impact of the demolition of the boundary of 35 St Andrew Square has not been considered in the assessment of impacts on the setting of Dundas House. This appears to be because demolition impacts have been assessed as a separate topic. It would have been helpful for the impacts on the setting of Dundas House to be presented together, regardless of their cause.

Other than on this one point we have not identified any issues with the methodology that appear to have affected the conclusions of the assessment.

We note the assessment of the socio-economic and cultural impacts. As our area of expertise relates only to the historic environment, we cannot comment on the methodology or scope of this assessment.

If the conclusions of this chapter are to be accepted, we are content that they are a relevant consideration as a potentially positive impact on Edinburgh WHS. This specifically relates to the site as a 'living capital city centre' with a 'rich cultural and intellectual life', which are attributes identified in the statement of Outstanding Universal Value.

Conclusion

We are content that sufficient information has been provided to come to a view on the planning application. We are content with the scope of the assessment and its methodology.

Historic Environment Scotland - Scheme Two response dated 12/03/2019

Our comments below relate specifically to the design amendments, subject of your re-consultations, and should be taken into account together with our existing main

response letter to these applications, dated 15 January 2019. Overall, we are satisfied that the amendments do not raise significant new issues for our interests, and that our position on the proposed development therefore remains the same.

Listed building consent applications

18/07127/LBC

As you will be aware from our main response letter of 15 January 2019, we are content that the proposals for the rear garden of 35 St Andrew Square would not have a significant adverse impact on the special architectural and historic interest of the building. We note the revisions, including deletion of the previously proposed retractable marker posts for the historic rear garden boundary line of 35 St Andrew Square, now proposed to be delineated by contrasting surface treatment as part of the wider public realm and landscape treatment for the development. We have no detailed comments to make on this revision.

18/07730/LBC

We are satisfied that the design revisions for the proposed music venue, including refinement of façade detailing/materials and crown parapet, do not raise new issues for us regarding the overall impact on the category A listed Dundas House. These revisions are mainly set out in the submitted revised Design and Access statement, chapter 16. Please also see our comments on the planning application below.

We are also pleased to note the revised proposals and additional information for Dundas House itself: to delete the previously proposed tall boiler flue; add opaque glazed panels for the banking hall new interior doors; and clarification of works to the existing cash point enclosure. These address the detailed comments we made on these specific proposals in our letter of 15 January.

Planning application

18/04657/FUL

We note that there is no change to the proposed new building in terms of its scale, height, mass, and site positioning. As the revisions relate mainly to the above mentioned refinement of the façade detailing/materials and crown parapet we are content that the changes do not raise significant new issues for our interests, including potential impact on the A listed Dundas House and its setting; the setting of other neighbouring A listed buildings; and the World Heritage Site.

We acknowledge the intention to further the mitigation of impacts through refinement of materials and creation of a simpler, more cohesive, backdrop to Dundas House. To assist with further consideration of this, we understand that arrangements are being made for the review of material samples on site, including mock up panels for the proposed honed and grit blasted precast concrete for the façades. We suggest that this includes sample panels positioned to the front of the site to allow comparison with Dundas House in close-up views from St Andrew Square.

We have no more detailed comments to make on the planning application, and our advice remains as previously stated

Environmental Impact Assessment

We note that no further assessment of impacts on our interests has been provided in the EIA Addendum. We therefore have no further advice to offer on this. We refer you to our previous response for our comments on the assessment and its methodology.

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.

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 development affecting the historic environment, together with related policy guidance.

Further Information

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

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online

Technical advice is available through our Technical Conservation website.

Historic Environment Scotland - Scheme 2 response dated 15/01/2019

Thank you for your consultations which we received on 13 September 2018. We have considered them in our role as a consultee under the terms of the above regulations.

In relation to both the planning application and the EIA consultation, our remit is World Heritage Sites, scheduled monuments and their setting, category A-listed buildings and their setting, and gardens and designed landscapes (GDLs) and battlefields in their respective inventories. We have a separate remit regarding listed building consent, concerning works to Category A and B listed buildings, demolition, and applications by planning authorities.

For this reason, we have separated our advice into three sections, one under each set of regulations. As there are two listed building consent consultations, we have stated our position separately for each.

You should also seek advice from your archaeology and conservation service for matters including unscheduled archaeology and category B and C-listed buildings.

Our Advice

Listed building consent

18/07127/LBC

We are content that these proposals for the rear garden of 35 St Andrew Square would not have a significant adverse impact on the special architectural and historic interest of the building. We therefore have no detailed comments on this application.

18/07730/LBC

We are content that the proposed demolitions, alterations and extension to Dundas House would not significantly diminish the special architectural and historic interest of the building. However, we consider there would be a significant impact on the setting of the building, which we have commented on under the associated application for planning permission below.

Our detailed comments on this LBC application are given in Annex 1 of this letter.

Planning application 18/04657/FUL

We consider that there would be a significant adverse impact on the setting of the Category A listed Dundas House, affecting some, but not all, key views of the building. We therefore advise that this should be taken into account in the decision making process. However, we are content that this impact would not significantly affect the special interest of the building, and does not raise issues of national interest for our remit. We therefore do not object to the planning application.

Our detailed comments on the planning application are given in Annex 2 of this letter.

Environmental Impact Assessment

We are content that sufficient information has been provided to come to a view on the planning application. We are content with the scope of the assessment and its methodology.

We have comments on the assessment itself and its conclusions. These are given in Annex 3 of this letter.

Further Information

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 in the national interest for our historic environment remit, and therefore we do not object.

Our decision not to object should not be taken as our support for the proposals. The applications should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

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

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online. Technical advice is available through our Technical Conservation website.

Historic Environment Scotland

ANNEX 1 Listed building consents

Your Council has consulted us in relation to works to two Category A listed buildings, which include the potential impacts on their setting. However, we have concentrated on assessing the impact on setting through the planning application process in Annex 2.

Our Managing Change guidance note on Extensions is a relevant consideration in assessing this application. In this instance, however, the guidance which it can offer is necessarily limited, as the most significant impacts of the proposed development relate to the setting of Dundas House. Although the application involves the extension of Dundas House, due to the depth, visibility and accessibility of the site, we consider the proposals would appear, like the rising St James hotel complex behind, to be part of the 'backdrop' of an urban townscape.

Our specific policy consideration in assessing applications for LBC is given in the Historic Environment Policy Statement at 3.47. This paragraph relates to alterations which would have an adverse impact on the special interest of the listed building.

18/07127/LBC - Application for listed building consent for associated proposed works, including demolitions, new boundary treatment and public realm (35 St Andrew Square)

We are content that these proposals for the rear garden of 35 St Andrew Square would not have a significant adverse impact on the special architectural and historic interest of the building. We therefore have no detailed comments on this application.

18/07730/LBC - Application for listed building consent for proposed demolitions, alterations, and extension (Dundas House, 36 St Andrew Square)

Demolition

The proposed demolition works primarily involve the 1960s office block by Glasgow architects Gratton & McLean. We do not consider that this block contributes to the special interest of Dundas House, and therefore do not object to its demolition. We are also satisfied that the other proposed demolitions, or removals, relating to secondary areas to the rear of Dundas House, would similarly result in no significant loss to the special interest of the listed building.

Extension

The extension, to form the proposed new music venue, is planned to connect with the rear facade of the banking hall, itself a mid C19th extension to the original Dundas House. In contrast to the relatively concealed 1960s block it would replace, the new structure would rise tall above the listed building, and expand beyond it to the rear on both north and south sides.

Our Managing Change guidance note on Extensions states that extensions should ordinarily be subordinate in both scale and form. In this sense, the proposals would be

contrary to the advice offered by this guidance. However, as above, in this instance we consider that the key impact of the proposed development would be on the setting of Dundas House. We have assessed this impact as part of our advice on the planning application, with reference to our relevant Managing Change guidance on Setting. (See Annex 2)

Alterations

These comprise alterations and remedial works, mainly to external elevations of lesser significance to the rear (east) of Dundas House due to the demolitions and new build. Existing stonework would be made good, and there would be a general tidying up of rainwater goods, cabling and other pipework. A large section of the existing rear elevation stonework would be exposed internally as a feature of the foyer for the new music venue.

The works involve various works to the building including covering over lightwells and infilling redundant door and window openings, with a few new openings. These works, and the internal alterations to Dundas House, we consider to be relatively minor, affecting areas of lesser significance. Two exceptions are the proposed doorway link between the banking hall and music venue and the Banking Hall cash cage.

A key element of the overall scheme is to provide an internal double-door access link between Dundas House and the new music venue. While we are satisfied that this new doorway would be sympathetic to the fine interior quality of the banking hall, we suggest that the glazed panels for the banking hall doors be obscured to conceal the contemporary metal doors on the music venue side, or at any rate that this important element (ie, where new meets old) be conditioned.

The submitted ground floor plan shows some alterations to an existing cash point structure within the banking hall. No interior elevation/section drawings or images appear to be submitted to show how these alterations may affect the special character of the exceptionally important banking hall. Clarity on this point should be obtained. Externally, the proposed tall boiler flue at rear roof level, at the north east corner, would detract from the appearance of the roof, and a more concealed or mitigated solution would be preferable.

We are pleased to note that there are no proposals to alter the 19th century ornamental cast-iron-railed screen enclosing the front forecourt on St Andrew Square, an important feature of the category A listing. We would urge that the current proposals to include a large service vehicle access be appropriately managed, under the application for planning permission, to ensure there would be no disturbance to the gatepiers, gates, railings, and lamp standards.

Conclusion

We are broadly content that the proposed direct physical interventions under 18/07730/LBC would not unduly diminish the building's special architectural and historic interest. However, as explained in Annex 2, we consider that the proposed extension would have an adverse impact on the setting of Dundas House, affecting some key views of the building.

We have therefore assessed the impacts in light of the policy considerations at paragraph 3.47a-d of HESPS, which concerns adverse impacts to the special interest of a listed building. In this instance, considerations b and d of this policy are relevant. Overall, on balance, we are content that the scale of the impact (3.47b.) on the listed building would not significantly harm its special interest. Therefore, we do not object to the listed building consent application.

We also note that the wider community benefits of the proposals (3.47d) may also be a consideration in decision making.

Historic Environment Scotland - Scheme 2 response dated 25/01/2019

Thank you for your consultation which we received on 24 January 2019. We have considered it and its accompanying EIA Report in our role as a consultee under the terms of the above regulations.

We understand that this consultation relates solely to the EIA regulations. We note that this consultation is to advise that the 2011 EIA regulations were quoted on your previous consultation letter, dated 13 September 2018.

Our Advice

We are content that our advice on this application and its accompanying environmental assessment, given in our letter dated 15 January 2019, is unaffected by this alteration. Our advice was given in reference to the 2017 EIA regulations, as quoted in our letter. We therefore have no additional or altered advice to offer at this stage, and our position remains as previously presented.

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.

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 development affecting the historic environment, together with related policy guidance.

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

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online. Technical advice is available through our Technical Conservation website.

Archaeology - Scheme 3 response dated 13/09/2021

Further to your consultation request I would like to make the following comments and recommendations concerning this application for the erection of music and performing arts venue with licensed café/restaurant and bar facilities, and related arrangements for infrastructure, demolitions, and other works. (See Cover Letter for full statutory description) (amended).

I refer you to my response to the original application below. Since the original 2018 application AOC Archaeology have undertaken some of the required Historic Building recording to No 36 St Andrews Square (AOC Interim report 24884 attached). However, the advice and recommendations contained in my 2018 response still remain valid.

The site occurs within the former gardens and curtilage of the A-listed RBS HQ (Dundas House, 36 St Andrew Square). Originally designed by Sir William Chambers this building was constructed in 1771 for Sir Laurence Dundas, becoming the HQ for the RBS in 1825. The site has seen several extensions since the mid- 19th century, most notably the construction of the banking hall + library wing (by Peddie and Kinnear) in 1858 and the 1960's rear extension and carparking. Located at the heart of James Craig's Georgian New Town the site is also surrounded by a number of A + B listed buildings including New Register House, 24-25 James Craig Walk, 37-39 St Andrew Square + 27-31 James Craig Walk

As such this site and its listed buildings are recognised as one of the key elements within the New Town section of Edinburgh's UNESCO World Heritage Site. Accordingly, this application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh Local Plan (2016) policy ENV1, ENV3, ENV4, ENV8 & ENV9.

Historic Buildings

The removal of the 20th century additions to Dundas House will it is agreed have a beneficial impact upon the setting both of this A-listed Georgian Mansion and also its immediate setting. That said the scale of the proposed new Arts Venue must be considered as having an immediate significant adverse impact as it will be seen overlooking Dundas House from several key viewpoints along George Street. Not only will it have significant impacts upon the immediate setting of this building, but it must also be considered to have similar impacts upon the adjacent listed buildings on James Craig Walk and also New Register House. That said although adverse, in archaeological terms such impacts are regarded as being moderate -low, given the Urban context.

In terms of physical impacts, the proposals will require the demolition of several 20th century buildings, a section of the listed (A) boundary wall and works to both 36 & 35 George Square. Having assessed these impacts it is considered that these works are acceptable having an overall low significant impact in archaeological terms. That said it is recommended that a programme of archaeological historic building recording (annotated plans, photo and written description) is undertaken of the modern buildings and rear wall prior to their demolition in order to provide a permanent record of these buildings due to their overall contribution to the history of the sites development. In addition, it is recommended that a programme of historic building recording is undertaken during works to No 36 George Square during any downtakings/alterations which could reveal evidence for the development of the Banking Hall and Georgian Mansion.

Buried Archaeology

The proposals will require significant ground-breaking works, principally in regards proposed demolition of the 20th century buildings on the site and the construction of the new Arts Venue. Such works have the potential to disturb archaeological remains relating to the construction and development of Dundas House. The potential for earlier remains surviving on site is however considered to be low.

Nevertheless, it is recommended in addition/alongside the recommended historic building recording, that programme of archaeological work is undertaken during groundbreaking works, in order to record, excavate and analyse any significant remains affected.

In consented it is essential therefore that a condition be applied to any consent if granted to secure this programme of archaeological works based upon the following CEC condition;

No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic building recording, excavation, analysis, reporting and publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

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

Archaeology - Scheme 2 response dated 22/10/2018

Further to your consultation request I would like to make the following comments and recommendations concerning these linked FUL + LBC applications for the erection of music and performing arts venue with licensed café/restaurant and bar facilities, and related arrangements for infrastructure, demolitions, and other works.

The site occurs within the former gardens and curtilage of the A-listed RBS HQ (Dundas House, 36 St Andrew Square). Originally designed by Sir William Chambers this building was constructed in 1771 for Sir Laurence Dundas, becoming the HQ for the RBS in 1825. The site has seen several extensions since the mid- 19th century, most notably the construction of the banking hall & library wing (by Peddie and Kinnear) in 1858 and the 1960's rear extension and carparking. Located at the heart of James Craig's Georgian New Town the site is also surrounded by a number of A & B listed buildings including New Register House, 2425 James Craig Walk, 37-39 St Andrew Square & 27-31 James Craig Walk

As such this site and it's listed buildings are recognised as one of the key elements within the New Town section of Edinburgh's UNESCO World Heritage Site. Accordingly, this application must be considered therefore under terms the Scottish Government Historic Environment Policy (SHEP), Scottish Planning Policy (SPP), PAN 02/2011 and also Edinburgh Local Plan (2016) policy ENV1, ENV3, ENV4, ENV8 & ENV9.

Historic Buildings

The removal of the 20th century additions to Dundas House will it sin agreed have a beneficial impact upon the setting both of this A-listed Georgian Mansion and also its immediate setting. That said the scale of the proposed new Arts Venue must be considered as having an immediate significant adverse impact as it will be seen overlooking Dundas House from several key view points along George Street. Not only will it have significant impacts upon the immediate setting of this building, but it must also be considered to have similar impacts upon the adjacent listed buildings on James Craig Walk and also New Register House. That said although adverse, in archaeological terms such impacts are regarded as being moderate low, given the Urban context.

In terms of physical impacts, the proposals will require the demolition of several 20th century buildings, a section of the listed (A) boundary wall and works to both 36 & 35 George Square. Having assessed these impacts it is considered that these works are acceptable having an overall low significant impact in archaeological terms. That said it is recommended that a programme of archaeological historic building recording (annotated plans, photo and written description) is undertaken of the modern buildings and rear wall prior to their demolition in order to provide a permanent record of these buildings due to their overall contribution to the history of the sites development. In addition, it is recommended that a programme of historic building recording is undertaken during works to No 36 George Square during any downtakings/alterations which could reveal evidence for the development of the Banking Hall and Georgian Mansion.

Buried Archaeology

The proposals will require significant ground-breaking works, principally in regards proposed demolition of the 20th century buildings on the site and the construction of the new Arts Venue. Such works have the potential to disturb archaeological remains relating to the construction and development of Dundas House. The potential for earlier remains surviving on site is however considered to be low. Nevertheless, it is recommended in addition/alongside the recommended historic building recording, that programme of archaeological work is undertaken during ground breaking works, in order to record, excavate and analyse any significant remains affected.

In consented it is essential therefore that a condition be applied to any consent if granted to secure this programme of archaeological works based upon the following CEC condition;

'No development shall take place on the site until the applicant has secured the implementation of a programme of archaeological work (Historic building recording, excavation, analysis, reporting and publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'

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

Economic Development - Scheme 3 response dated 20/09/2021

The proposed development is expected to directly support 23 headcount jobs and £0.8m of GVA per annum. By comparison, it is estimated that the existing office space could, if fully occupied by a financial services occupier, directly support 161 FTE jobs and £26.2m of GVA per annum (2019 prices). The direct economic benefits of the proposed development are modest.

If multiplier effects and other indirect impacts are taken into account, these figures rise to 134 headcount jobs and £4.6m of GVA per annum for the proposed development versus 440 FTE jobs and £42.9m of GVA per annum (2019 prices) for the existing building.

It is noted that the considerable existing number of musical venues in the city centre suggests that a significant level of displacement is likely; in particular, the proposed development is anticipated to impact upon the Queen's Hall. It is also noted that many of the jobs supported by the proposed development are associated with visitor expenditure meaning they may be seasonal.

From a purely quantitative perspective, the development as proposed is expected to support fewer jobs and a lower level of economic activity than the existing building, albeit it is recognised that the existing building is of advanced age and may not be attractive as a proposition for office redevelopment/refurbishment. The Royal Bank of Scotland have not made use of the space for many years and, as such, it currently offers no real benefit to the economy.

The following are comments from the City of Edinburgh Council's Commercial Development & Investment service relating to planning application 18/04657/FUL for the development of a music and performing arts venue with café/restaurant and facilities at 35-36 St Andrew Square.

Commentary on existing uses

The application relates to a 0.77-hectare site to the east side of St Andrew Square incorporating 36 St Andrew Square (the category 'A' listed Dundas House office building and its annexes: the "south wing" to the south and the "rear block" to the east) along with parking spaces, outbuildings, and the gardens of 35 St Andrew Square.

The "rear block" is a three-storey office annexe to Dundas House developed in 1965 for Royal Bank of Scotland staff. The proposed development would entail the demolition of 1,610 sqm of existing office space. The economic impact of this existing space if fully occupied can be estimated. Office lettings in St Andrew Square in recent years have been dominated by the financial services sector with Standard Life Aberdeen, Baillie Gifford, and Computershare all letting large properties. Based on a typical employment density for the financial services sector of one full-time equivalent employee per 10 sqm, a building of this scale could be expected to directly support approximately 161 FTE jobs if fully occupied (1,610 ÷ 10). Based on a mean gross value added per employee for the "financial and insurance services" sector of Edinburgh of £162,697

(2019 prices), this could be expected to directly add £26.2m of GVA per annum (2019 prices) (161 × £162,697) to the economy of Edinburgh if fully occupied.

If multiplier effects - the impact of supply chain expenditure and expenditure by employees - are taken into consideration the projected total impact of the rear block if fully occupied would be 440 FTE jobs and £42.9m of GVA per annum (2019 prices).

The loss of office space in the city centre is unfortunate. While the COVID-19 pandemic is likely to depress demand, prior to the pandemic there was a significant undersupply of office space in the city centre and in recent years significant space has been lost to alternative uses. It is recognised, however, that the building in question is of advanced age and that its "tucked away" location may mean it is not an attractive proposition for redevelopment/refurbishment.

As the site is less than one hectare, policy EMP 9 of the LDP does not apply. There is therefore no requirement for any development to incorporate business space.

Commentary on proposed uses

The application proposes the demolition of the rear block and other ancillary structures to the east of Dundas House and their replacement with a new concert hall. Dundas House and the south wing are proposed to remain relatively unchanged.

Class 11 - Assembly and leisure

The development as proposed would deliver 7,625 sqm of class 11 space (gross) in the form of a new concert hall. The concert hall would comprise a 1,000-seat auditorium, two large multi-purpose rooms, back-of-house facilities, a café/bar, and a foyer capable of hosting "informal performances".

The applicant has provided a report on the projected socio-economic impacts of the development. This report estimates that the development would, once operational, directly support 23 headcount jobs and £0.8m of GVA per annum. Additional impacts - multiplier effects and the impact of spending by performers and customers visiting Edinburgh to attend the concert hall - are projected to support a further 111 headcount jobs and £3.8m of GVA per annum, giving a total projected impact of 134 headcount jobs and £4.6m of GVA per annum (all figures gross).

It is noted that of the 134 jobs expected to be supported by the development, 74 pertain to visitor expenditure and 17 pertain to performer expenditure. These are jobs supported by expenditure in Edinburgh outwith the concert hall by the customers and performers attending the concert hall. These jobs may therefore be seasonal with lower levels of employment at times when patronage of the concert hall is lower rather than steady year-round employment.

Overall impact

The development as proposed would result in the loss of 1,610 sqm of space in the "rear block" of 36 St Andrew Square. It is estimated that the direct economic impact of this building if fully occupied by a financial services occupier would be 161 FTE jobs and £26.2m of GVA per annum (2019 prices). By comparison, the proposed development is expected to directly support 23 headcount jobs and £0.8m of GVA per annum.

If multiplier effects and other indirect impacts are taken into account, the existing building could be expected to support 440 FTE jobs and £42.9m of GVA per annum (2019 prices), versus 134 headcount jobs and £4.6m of GVA per annum for the proposed development.

This indicates that the development as proposed is expected to support a significantly lower economic impact than could potentially be supported by the existing building if fully occupied although it must be borne in mind that letting this building in its current condition would be challenging. Direct employment associated with the development is modest.

There are three principal existing dedicated concert halls in Edinburgh city centre - the Usher Hall (capacity 2,200), Queen's Hall (900), and Reid Concert Hall (218) - along with multiple smaller music venues. There are also multiple other venues in the city centre that host music performances, including the Playhouse (3,059); King's Theatre (1,350); Festival Theatre (1,915); Assembly Rooms Music Hall (788); Royal Lyceum Theatre (658); and St Andrew's and St George's West (200). While it is recognised that there will be differences in the specifications of each venue determining what performances each can host, it is assumed that there will be some degree of crossover in terms of the market for each. From a cursory analysis of event calendars, it does not appear that all of the aforementioned venues are being fully utilised. It is noted that the Scottish Chamber Orchestra currently performs in the Queen's Hall and it is proposed to relocate these performances to the new concert hall, suggesting any economic activity associated with the Scottish Chamber Orchestra will be displaced from the Queen's Hall. In the absence of any detailed analysis evidencing a current shortage of musical venues in Edinburgh city centre it is considered prudent to assume that there will be significant displacement of economic activity from elsewhere. This conclusion is borne out by the applicant's contextual report which describes the Queen's Hall as "a converted former church building with many limitations for both performers and audiences" and highlights the perceived low quality of existing venues, suggesting that the new concert hall is intended to be a higher quality replacement for the existing venues. It is therefore suggested that the economic impacts associated with the development would in large part be cannibalised from elsewhere in the city's economy.

The development as proposed will result in the loss of a 1,764 sqm of office space in the city centre; it is estimated that, if fully occupied by a financial services occupier, this space could directly support 161 FTE jobs and £26.2m of GVA per annum (2019 prices). Figures provided by the applicant suggest that the proposed development could directly support 23 headcount jobs and £0.8m of GVA per annum.

If multiplier effects and other indirect impacts are taken into account, these figures rise to 440 FTE jobs and £42.9m of GVA per annum (2019 prices) for the existing building versus 134 headcount jobs and £4.6m of GVA per annum for the proposed development.

It is noted that statements made by the applicant coupled with the considerable existing number of musical venues in the city centre suggests that a significant level of displacement is likely; in particular, the proposed development is anticipated to impact upon the Queen's Hall. It is also noted that many of the jobs supported by the proposed development are associated with visitor expenditure meaning they may be seasonal.

From a purely quantitative perspective the development is expected to support lower levels of employment and economic activity than would the existing building if fully occupied. From an economic development perspective, refurbishing or replacing the existing office building would be expected to deliver significantly higher economic impacts. However, it is recognised that the existing building is of advanced age and that its specific location may make it less attractive as a proposition for redevelopment/refurbishment.

There are also qualitative arguments for bringing forward such a development that should be factored into any decision making process.

This response is made on behalf of Commercial Development & Investment

Economic Development - Scheme 2 response dated 03/10/2018

Commentary on existing use

The application relates to a 0.78-hectare site to the east side of St Andrew Square incorporating 36 St Andrew Square (the category 'A' listed Dundas House office building and its annexes: the "south wing" to the south and the "rear block" to the east) along with parking spaces, outbuildings, and the gardens of 35 St Andrew Square.

The "rear block" is a 1,764 sqm three-storey office annexe to Dundas House developed in 1965 for Royal Bank of Scotland staff. The economic impact of this building if fully occupied can be estimated. Office lettings in St Andrew Square in recent years have been dominated by the financial services sector with Standard Life Aberdeen, Baillie Gifford, and Computershare all letting large properties. Based on a typical employment density for the financial services sector of one full-time equivalent employee per 10 sqm, a building of this scale could be expected to directly support approximately 176 FTE jobs if fully occupied ($1,764 \div 10$). Based on a mean gross value added per employee (2016 prices) of £110,862, this could be expected to directly add £19.5m of GVA per annum (2016 prices) ($176 \times £110,862$) to the economy of Edinburgh if fully occupied.

If multiplier effects - the impact of supply chain expenditure and expenditure by employees - are taken into consideration the projected total impact of the rear block if fully occupied would be 388 FTE jobs and £32.6m of GVA per annum (2016 prices).

As the site is less than one hectare, policy EMP 9 of the LDP does not apply. There is therefore no requirement for any development to incorporate business space.

Commentary on proposed uses

The application proposes the demolition of the rear block and other ancillary structures to the east of Dundas House and their replacement with a new concert hall. Dundas House and the south wing are proposed to remain relatively unchanged.

Class 11 - Assembly and leisure

The development as proposed would deliver 11,347 sqm of class 11 space (gross) in the form of a new concert hall. The concert hall would deliver a 1,000-seat auditorium, a 200-seat studio, and "multi-purpose spaces" along with a café/bar.

The applicant has provided a report on the projected socio-economic impacts of the development. This report estimates that the development would, once operational, directly support 32 headcount jobs and £1.2m of GVA per annum. Additional impacts - multiplier effects and the impact of spending by performers and customers visiting Edinburgh to attend the concert hall - are projected to support a further 172 headcount jobs and £5.9m of GVA per annum, giving a total projected impact of 204 headcount jobs and £7.1m of GVA per annum (all figures gross).

It is noted that of the 204 jobs expected to be supported by the development 65 are in restaurants and cafés and 35 are in visitor accommodation. These are jobs supported by expenditure in Edinburgh outwith the concert hall by customers and performers attending the concert hall. These jobs may therefore be seasonal with lower levels of employment at times when patronage of the concert hall is lower and vice versa.

Overall impact

The development as proposed would result in the loss of the "rear block" of 36 St Andrew Square, a 1,764 sqm office building. It is estimated that the total economic impact of this building if fully occupied by a financial services occupier would be 388 FTE jobs and £32.6m of GVA per annum (2016 prices). The economic impact assessment provided by the applicant suggests that the development would, once operational, support 204 headcount jobs and £7.1m of GVA per annum.

There are three principal existing dedicated concert halls in Edinburgh city centre - the Usher Hall (capacity 2,200), Queen's Hall (900), and Reid Concert Hall (218) - along with multiple smaller music venues. There are also multiple other venues in the city centre that host music performances, including the Playhouse (3,059); King's Theatre (1,350); Festival Theatre (1,915); Assembly Rooms Music Hall (788); Royal Lyceum Theatre (658); and St Andrew's and St George's West (200). While it is recognised that there will be differences in the specifications of each venue determining what performances each can host, it is assumed that there will be some degree of crossover in terms of the market for each. From a cursory analysis of event calendars, it does not appear that all of the aforementioned venues are being fully utilised. It is noted that the Scottish Chamber Orchestra currently performs in the Queen's Hall and it is proposed to relocate these performances to the new concert hall, suggesting any economic activity associated with the Scottish Chamber Orchestra will be displaced from the Queen's Hall. In the absence of any detailed analysis evidencing a current shortage of musical venues in Edinburgh city centre it is considered prudent to assume that there will be significant displacement of economic activity from elsewhere. This conclusion is borne out by the applicant's contextual report which describes the Queen's Hall as "a converted former church building with many limitations for both performers and audiences" and highlights the perceived low quality of existing venues, suggesting that the new concert hall is intended to be a higher quality replacement for the existing venues. The Council's Culture service has assessed the proposals and acknowledged that "that there will be an issue around displacement of activity with the IMPACT Centre [which] will divert some performance activity away from venues such as the Usher Hall and Queen's Hall". However, the Culture service has announced plans to create a

working group to "ensure a balanced and co-ordinated diary of events is planned and marketed for the city" and concludes that the IMPACT Centre "has the potential to offer a net gain to the city for artistic performance and audience attendance."

Other considerations

The site forms part of the wider Register Lanes area: the collection of backroads in the area bounded by Princes Street; St Andrew Square; Multrees Walk; and James Craig Walk. Despite their prime location, these areas receive relatively low footfall. The aspiration is that developments such as Edinburgh St James and The Registers will enliven this area. The proposed development would be accessible from Register Place and it could be expected that creating a major visitor attraction at the end of this street would attract considerable additional footfall.

SUMMARY RESPONSE TO CONSULTATION

The development as proposed will result in the loss of a 1,764 sqm office building within the central business district; it is estimated that, if fully occupied by a financial services occupier, this building could directly and indirectly support a total of 388 FTE jobs and £32.6m of GVA per annum (2016 prices). Figures provided by the applicant suggest that the proposed development could directly and indirectly support 204 headcount jobs and £7.1m of GVA per annum.

This response is made on behalf of Economic Development.

Culture Service - Scheme 2 response dated 25/02/2019

1. Context

The proposed new mid-scale music venue for the capital represents an ambitious and exciting development in the City's cultural infrastructure, and, for music, the biggest capital intervention in over a century since the construction of the Usher Hall.

For over 2 decades the need for a high quality mid-scale music venue has been voiced by many people and organisations, resulting in recommendations for such in a range of reports:

the 2006 CEC Review of Music Provision, the 2009 Cultural Venues Study and the 2015 Thundering Hooves Study. It is an infrastructural gap where Edinburgh falls behind in comparison to other cities - nationally and internationally. The significant capital investments achieved to date evidences support from all levels of government from local to UK and forms an important cultural strand in the ESESCR Deal.

Its ambitions across the spectrum - design, artistic programme, community and educational engagement, acoustic and user facilities - will make it a destination venue for the country.

2. Cultural Impact

The ambitions of the proposed design offer a wide range of opportunities not only to strengthen existing music provision in the city for artists and audiences, but also new opportunities to develop international mid-scale music touring from artists and visitors. It will provide a world class home for the Scottish Chamber Orchestra (SCO) for performance, rehearsal, recording and outreach/community activity. This is a significant point given that Scotland's other four national performing companies have had their capital ambitions realised. A new home for the SCO would complete this process and provide a national base for Edinburgh's only national performing company.

Through a close working partnership with the Edinburgh International Festival (EIF), it will provide a world class venue for supporting and developing the Festival's artistic and audience development ambitions. An agreement between the Scottish Government, the City of Edinburgh Council and the 11 major Edinburgh Festivals to invest a £1 million each year for the next five years has also been reached. This will enable the festivals to develop their programming and content, skills sharing and development and deep and wide engagement and the new venue would be a complement to those investments.

Equally, the year round cultural infrastructure is a critical element in enabling the festivals to thrive. The capital investment in the IMPACT Scotland proposal therefore reflects the interdependence between renewing cultural content as well as infrastructure, only this twin approach will avoid eroding Edinburgh's status as the pre-eminent cultural 'Festival City'.

The IMPACT Centre has also established early relationships with other music and performing arts companies who would use the venue for performance and rehearsal (the National Youth Choir of Scotland (NYCOS), Red Note Ensemble, Celtic Connections, BBC Scottish Symphony Orchestra) as well as identifying community engagement projects with the SCO (e.g. enhancing the Music For Life programme) which will add strength to the cultural offer from the start and extend access to the world class facility.

Having a physical venue and facilities associated with community and education will also be transformative, with proposals for a recording studio and digital technologies built in to the finished design, and full-time education officer identified within the staff structure. The business case highlights that the Centre will develop opportunities with range of city region deal and other partners to achieve a diverse audience and participant base for using the venue - at free or minimal cost. A good comparator would be the enhanced facilities at the Glasgow Royal Concert Hall which has allowed the other national orchestra, the Royal Scottish National Orchestra, to significantly enhance and expand its outreach and engagement programme to deliver musical opportunities for all ages and backgrounds. The project is also aligned with the Inclusive Growth within the framework of the City Deal PMO, identifying with 2 themes - a significant programme of construction and social benefit through innovation.

In recent years other cities have extended and improved their infrastructure for live music with major developments to support a range of music genres - Glasgow (City Halls, CCA, Royal Concert Hall expansion), the Sage Centre in Gateshead, London (major investment to South Bank Centre, King's Place, among a plethora of other expanding venues), Bristol (St George's, Colston Hall), the Millennium Centre in Cardiff to name a few. It is interesting to note that concert hall construction across the globe

has grown dramatically with most cities investing in world class architecturally landmark venues, whilst Edinburgh has seen no new development for 100 years beyond the refurbishment of the Usher Hall.

A successful live music environment works on a number of levels - locally it is important to have a competitive and complimentary range of venue spaces from small to large scale which enable a range of activity to take place across different scale and styles. In comparison to many cities, Edinburgh lacks a number of key facilities at present - an arena for the larger scale, a mid-scale rock and pop venue since the demise of The Picturehouse (a role that it is hoped Leith Theatre will be able to fulfil) and a high quality mid-scale contemporary venue which plays an active role in curating content. The latter role would be fulfilled by The Impact Centre which presents an outline business case for programming and renting the venue for a diverse range of music styles - jazz, world, folk, acoustic rock and pop and traditional.

Nationally and internationally, the music industry revolves around recording and distribution, either through recorded content (streaming, records/CDs, etc) and touring. Edinburgh currently misses out on a number of mid-scale music tours due to the lack of an active, curating mid-scale venue as well as the high quality performing environment required by artists and promoters. As outlined in the previous paragraph, the IMPACT Centre's business plan aims to offer a dynamic performance space in the heart of the city.

It is acknowledged that there will be an issue around displacement of activity with the IMPACT Centre. With a capacity of 1,000 plus a smaller 200 seat performance space, it will occupy a position as the city's pre-eminent mid-scale space, and as will divert some performance activity away from venues such as the Usher Hall and Queen's Hall. Both of these venues host performance, rehearsal and recording activity by the Scottish Chamber Orchestra which would all move to the IMPACT Centre. It is anticipated the Queen's Hall would experience the most impact due to the similar capacity levels, and the Queen's Hall currently generates revenues from being the principal box office for the Scottish Chamber Orchestra which would move to the IMPACT Centre along with other Queen's Hall performance events. Some smaller Usher Hall artists and events could also migrate to the IMPACT Centre, dependent on audience expectancies and market conditions.

To mitigate this and ensure a strategic and co-ordinated approach to the future programming of key music venues in the city, the City of Edinburgh Council will chair a working group including representatives from IMPACT Scotland, the Queen's Hall, Leith Theatre and the Usher Hall. The working group will ensure a balanced and co-ordinated diary of events is planned and marketed for the city.

To balance this it is recognised that the IMPACT Centre has the potential to offer a net gain to the city for artistic performance and audience attendance. The Queen's Hall has identified future artistic opportunities across a diverse range of music genres as well as capital ambitions of its own, and would benefit from the diary space left by rehearsal bookings by the Scottish Chamber Orchestra. Similarly the Usher Hall can make use of the days left by recordings and rehearsals with demand for diary dates from promoters at a high. The existing venues also welcome the competition and dynamism that the IMPACT Centre offers in building and enhancing Edinburgh's reputation as a great city for live music. With other potential projects on the horizon such as Leith Theatre and the redevelopment of the Ross Bandstand, Edinburgh can look forward to a brighter environment for live music.

3. Summary

The IMPACT Centre proposal is fully endorsed by the Culture Service within the City of Edinburgh Council. It forms an important cultural strand within the ESESCR deal, unlocking £25 million of strategic match funding from all levels of government and has significant financial backing and under-pinning from a private philanthropic donor. It will form an important strategic development in the city's cultural infrastructure - the first major new venue in over a century - and create a vital stimulus for live music, musicians and audiences. It will enhance the year round and festival offer in a landmark architectural venue, attracting new and existing audiences as active participants and consumers and set a new and exciting standard for the next 100 years.

Edinburgh Urban Design Panel - 27/09/2017

1 Recommendations

1.1 The Panel was supportive of the principle of a music venue in this location and acknowledged that it represented an exciting opportunity to enhance activity and permeability in the surrounding public realm.

1.2 The Panel advised that the proposal's relationship to its special historic setting and its impact on important axial and oblique views, particularly the view of Dundas House from George Street, is critical and requires to be carefully considered. The Panel also agreed that a coherent, well designed and high quality public realm would be essential to the success of this development and its integration with the surrounding area.

1.3 In developing the proposals, the Panel suggests the following matters should be addressed:

- o Ensure that the development relates appropriately in position, scale, massing and design to the site's special historic character and key views;*
- o Develop a coherent, high quality public realm which enhances legibility through the site;*
- o Maximise barrier-free pedestrian permeability into and through the site and minimise conflict with service vehicles;*
- o Develop an architectural response which feels part of Edinburgh and can stand the test of time; and*
- o Incorporate security measures through early engagement with security advisors.*

2 Introduction

2.1 The site is located to the east of St Andrew Square, south of Multrees Walk and west of St James Centre. The site comprises of the A Listed Dundas House (36 St Andrew Square), its rear extension (circa 1960s) and car park. Dundas House is a three storey building of relatively modest scale and it contributes to the very high quality historic townscape of Edinburgh's New Town. It is positioned on axis with George Street where axial views are critical to its setting.

2.2 The site is located in the City Centre Retail Core and City Centre, as defined in the Edinburgh Local Development Plan (LDP). It also sits within the New Town Conservation Area and Edinburgh World Heritage Site. The site is located close to several listed buildings and structures. The site also sits in a number of key views as set out in the Edinburgh Design Guidance.

2.3 The site is also located within the St James Quarter Development Brief, where it identifies new opportunities for pedestrian permeability through the site.

2.4 One declaration of interest was made by Adam Wilkinson from Edinburgh World Heritage Trust (EWHT), who confirmed that he had met previously with the agents/developers regarding this proposal. This was not considered to be conflicted interest.

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

2.6 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 who are represented at the Panel forming a differing view about the proposals at a later stage.

3 Position, Scale, Massing and Design

3.1 The Panel welcomed the use of the model to demonstrate the proposal's potential scale and massing and agreed that its impact upon the site's special historic setting and key views, particularly the long view from George Street, was a critical consideration.

3.2 The Panel was concerned about the proposal's scale and massing particularly given the limited size of the site. The Panel recognised that the design concept is still at an early stage and may have an adverse impact on the character of the area and the amenity of adjacent buildings. The Panel agreed that further work is needed to ensure the proposal sits comfortably on the site.

3.3 The Panel discussed whether the proposal should be viewed as currently proposed in an asymmetric form from behind Dundas House, or whether the proposal should be visible at all above Dundas House when viewed from George Street. Dundas House is part of the 'set piece' of buildings along George Street and the proposal should not detract from this. The Panel suggested that one option could be that the proposal may be sunk down to minimise its visual impact. The Panel concluded that further assessment work was needed to explore how the development will impact on key views, particularly eye level views, and the setting of listed buildings, particularly Dundas House.

3.4 The Panel suggested that distant and unexpected views of the proposal should be explored including those from oblique angles.

3.5 The Panel was concerned that the positioning of the concert hall, studio and public foyer in separate blocks (albeit connected by access links), could result the site appearing fragmented. There is precedent for this in the character of the immediate area but the coherence of the buildings, public realm and links in-between will be

critical. Further work is needed to ensure this is delivered. The Panel was also keen to see the site linking logically into adjacent sites.

3.6 The Panel was sceptical about the indicative classical coliseum-style architecture with arcade detailing for the concert hall as this style does not initially resonate with the character of the New Town. However, the Panel was not averse to a contemporary response with a take on classical architecture so long as it is respectful to the site and its context. The Panel confirmed that the detailing and materials will be critical to achieving this aim.

3.7 The Panel felt that the link building could be better concealed as this looked to clash with the rest of the proposal and Dundas House.

3.8 The Panel agreed that lighting of the buildings and their setting would be an important consideration.

3.9 The Panel advised that sandstone should be used if masonry is proposed and glazing would help to lighten the built form.

3.10 The Panel wishes to see a robust design which can stand the test of time.

4 Public Realm

4.1 The Panel strongly emphasised that the discovery of the development as a 'jewel' from the surrounding lanes should be enhanced by a coherent and high quality public realm which links seamlessly (physically and visually) to its context.

4.2 The Panel was supportive of the increased activity that would be created from the proposal and encouraged the use of ground floors to maximise this. The Panel advised that the public realm should create an engaging setting for the surrounding buildings.

4.3 The Panel considered that the built form could come out of a beautiful 'carpet' of materials set out in the public realm. The Panel stated that the use of simple, elegant and high quality materials will be key to creating a coherent, welcoming and active public realm. Careful use of hard and soft materials will also be critical.

4.4 The serviceability of the site needs to be carefully considered and the Panel was supportive of using an underused unit space within Multrees Walk as a service area for the development to separate service vehicles from the pedestrian environment.

4.5 The Panel noted that public and private spaces should be appropriately delineated.

4.6 The Panel emphasised the importance of maintaining the 'set piece' of Dundas House, railings and gates, and noted its significant contribution to the proposal's setting therefore cautioned against any substantive changes.

5 Permeability

5.1 The Panel was supportive of the aim to increase pedestrian permeability into and through the site. The Panel stated that links should be barrier-free and accessible for all

users. The Panel stated that the emphasis should be placed on routes through rather than buildings across.

5.2 The Panel suggested that the space under the linked overhead walkway between the concert hall and ancillary buildings could be enlarged, creating strong views into the site and encouraging pedestrian use.

6 Use

6.1 The Panel was supportive of the use of the site for a music venue and suggested that further links could be made with University of Edinburgh's School of Music.

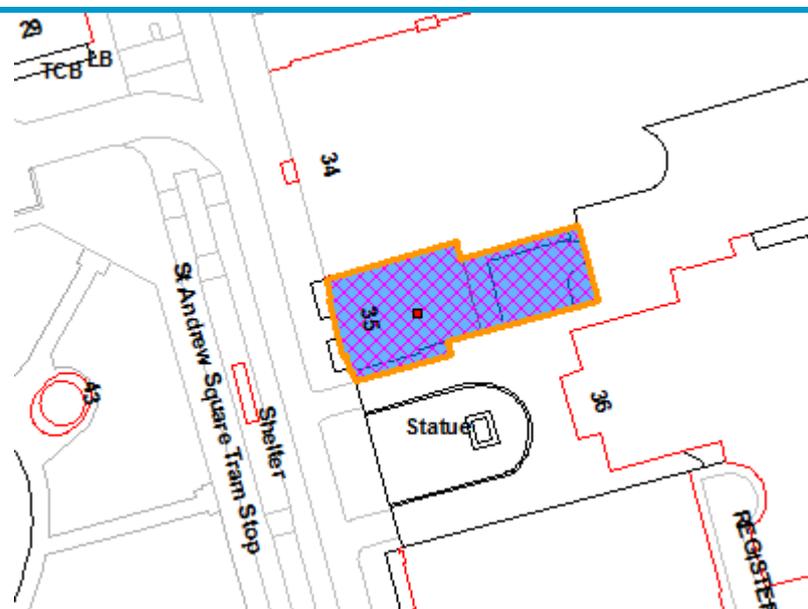
6.2 The Panel was concerned that the proposal may displace existing residents if it impacts negatively on the amenity of neighbouring housing. This needs to be carefully considered.

7 Security

7.1 The Panel advised that early discussions with security advisors should be held to build in any counter-terrorism elements to the proposal.

7.2 The Panel stated that a good security strategy including requirements for lighting/CCTV/passive surveillance should be built into the proposals at an early stage.

Location Plan



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