

# Development Management Sub Committee

Wednesday 2 June 2021

**Application for Planning Permission 20/05444/FUL  
At 109, 110 And 111 Princes Street,, 112 Princes Street And  
144-150 Rose Street, (Debenhams)  
Proposed redevelopment + change of use of existing  
premises to form hotel with rooftop bar/restaurant, active  
uses at lower floors including restaurant/bar/retail/flexible  
meeting/event/venue space, health suite/gym, together with  
ancillary uses, associated works/alterations/demolitions  
(use classes 1/2/3/4/7/11 and sui generis).**

**Item number**

**Report number**

**Wards**

B11 - City Centre

## Summary

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

The proposals comply with the adopted Local Development Plan policies and non-statutory guidelines and have no adverse effect on the Outstanding Universal Value of the World Heritage Site or the designed landscape. The development is sustainable has no detrimental impact on significant archaeological remains, residential amenity, road safety, infrastructure or biodiversity. There are no identified impacts on equalities or human rights and no material considerations that outweigh this conclusion.

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## Links

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### [Policies and guidance for this application](#)

LDPP, LDEL02, LRET01, LRET09, LEMP10, LRET11, LRET07, LEN04, LEN03, LEN06, LEN01, LEN07, LDES01, LDES03, LDES04, LDES06, LDES07, LEN09, LDES05, LDEL01, LTRA02, LTRA03, LTRA04, NSG, NSLBCA, NSESBA, NSGD02, CRPNEW, HES, HEPS, HESUSE, HESSET,

# Report

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## Recommendations

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

## Background

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### 2.1 Site description

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

#### 112 Princes Street

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

#### 109, 110 and 111 Princes Street

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

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

### 144-150 Rose Street

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

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

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

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

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

## **2.2 Site History**

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

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

## Main report

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### 3.1 Description Of The Proposal

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

#### External Alterations

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

#### Internal Alterations

The associated application for listed building consent (reference 20/05442/LBC) includes the relocation of the historic Conservative Club stair as a centrepiece feature within the front of house/public areas of the new hotel, along with the associated stained-glass windows in the west gable wall. Internal alterations are also proposed to the former Liberal Club building.

The new hotel will incorporate a direct pedestrian link leading from the main entrance on Princes Street, running below Rose Street South Lane then up one level via stair and lift access to exit on Rose Street.

No car parking is proposed and a total of 42 secure, indoor cycle parking spaces will be provided within the development as follows: 30 spaces within a store at upper floor level in the Princes Street building (with level access from Rose Street South Lane) and 12 spaces within the ground floor lobby of the Rose Street building. There will be changing facilities for staff at basement level within 112 Princes Street.

Service vehicles will access the development from Rose Street South Lane.

The original scheme submitted has not changed, apart from the reduction of hotel bedrooms from 208 to 207 and very minor design amendments. Further annotations have been added to certain drawings to clarify particular aspects regarding the proposed retail and Class 3 uses and the location of internal heritage assets.

### **Supporting Documents**

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

- Pre-application Consultation (PAC) Report
- Planning Statement;
- Heritage and Townscape Statement;
- Design and Access Statement;
- Townscape and Visual Impact Assessment including verified views;
- Archaeological Written Scheme of Investigation;
- Noise Impact Assessment;
- Transport Statement;
- Low and Zero Carbon Technology Feasibility Study and Sustainability Statement; and
- Surface Water Management Plan.

### **3.2 Determining Issues**

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states that in considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority 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.

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.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

### 3.3 Assessment

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

- a) the development is acceptable in principle in this location;
- b) the proposals preserve the character and setting of the listed buildings;
- c) the proposals preserve or enhance the character or appearance of the conservation area;
- d) the proposals harm the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site;
- e) the proposals adversely affect the Designed Landscape;
- f) the proposals are sustainable, of acceptable design and contribute towards a sense of place;
- g) the proposals have an adverse impact on significant archaeological remains;
- h) the proposals have a detrimental impact on residential amenity;
- i) the proposals have a detrimental impact on road safety or infrastructure;
- j) the proposals have an adverse impact on biodiversity;
- k) any impacts on equalities or human rights are acceptable; and
- l) public comments have been addressed.

#### a) Principle

The site is located within the City Centre as designated by the Edinburgh Local Development Plan (LDP).

LDP Policy Del 2 guides development in the city centre, stating that development will be permitted which, "retains and enhances its character, attractiveness, vitality and accessibility and contributes to its role as a strategic business and regional shopping centre and Edinburgh's role as a capital city". Proposals are required to meet various criterion including, a use or mix of uses appropriate to the location of the site and, in the case of major mixed-use developments, offices (particularly on upper floors) and other uses at street level to maintain city centre diversity, especially retail use in important shopping frontages.

The proposed development is a high-quality, upscale hotel with complementary commercial and leisure uses which will help to sustain footfall levels in this area, especially given that the new St James development is expected to shift the centre of the city's retail core to the east. In addition, the proposal includes an element of flexible retail space within a new arcade connection running from Princes Street through to Rose Street. The range and balance of uses proposed complement and support the existing tourist, commercial and leisure uses characteristic of the First New Town and will add to the vitality of the area. The redevelopment of these important listed buildings in appropriate and sustainable long-term uses will enliven this section of Princes Street which would otherwise be left with an empty former department store which has no prospect of being re-used as an entire retail outfit. Also, the inclusion of café/restaurant uses at street level and a rooftop bar will add life to this block, including during evening hours.

LDP Policy Ret 1 states that, "planning permission will be granted for retail and other uses which generate a significant footfall including commercial leisure use, offices, community and cultural facilities'." A key objective of the LDP is "to sustain and

enhance the city centre as the regional focus for shopping, entertainment, commercial leisure and tourism related activities and encourage appropriate development of the highest quality".

Whilst there will be a net loss of retail floor space, the proposed use is consistent with the retail policy intentions set out in the LDP of reinforcing the retail vitality of the shopping streets in the retail core by providing a mixed-use hotel/commercial/leisure facility. The proposal has also "paid special attention to upper floors, if not used for retail purposes, and how these may be put to, or brought into beneficial use which will enhance the city centre character" by providing a bar/restaurant at rooftop level with access to views across Princes Street over the Waverley Valley and across to the Firth of Forth. The new structure behind the historic façade at 112 Princes Street will respect the original floor levels and provide clear views out from the large public room windows of the former Conservative Club.

Policy Ret 9 presumes against changes of use in the city centre retail core which would undermine the retailing function of the area, but the proposed development is not likely to have this effect. The City Centre Shopping and Leisure Supplementary Guidance states that there are benefits in allowing shops to change to other uses that preserve and enhance the city centre's vitality and viability. The proposal complies with Policy CC 1 in the guidance regarding the change of use of shop units within the identified Primary Frontages to non-shop uses in Princes Street and Rose Street in terms of maintaining no more than one third of the total number of units in the frontage in non-shop use. In the case of shop units that have multiple levels, this criterion will apply to the ground floor level of the unit only. The proposed restaurant, bars and cafes at ground floor level are appropriate commercial uses which will complement the character of the City Centre Retail Core and will not be detrimental to its vitality or viability. Whilst the ground floor of the Princes Street premises has been designed so that it will be used as a hotel restaurant and while the hotel use is different to the class 3 or class 11 set by Policy CC1, the proposed use is acceptable in this instance. Also, the LDP allows a more flexible approach to the introduction of complementary uses that support the main shopping function of the city centre and encourages use into the evening "in order to achieve a diverse, thriving and welcoming city".

The proposed retail elements integrated within the development are supported by Local Development Plan Policy Ret 1. The applicant's aim is to support and promote local makers, craftspeople and artisans by providing flexible retail spaces at ground level of the hotel on Princes Street along the new arcade and within the ground floor of the Rose Street premises. These "pop-up retail" spaces will be convenient and attractive to users of the public space created in the ground floor of the hotel which will be flexible in use accommodating a bar/restaurant, cultural and art displays and performance areas during the Festival.

LDP Policy Emp 10 permits hotel development in the city centre where it may be required to form part of mixed-use schemes, if necessary to maintain city centre diversity and vitality. Given the major commercial and tourism role of the Princes Street and the accessibility of this site via sustainable means of transport, hotel development is acceptable in principle. The hotel use will support the range of uses proposed on this site and the existing surrounding uses and the total number of bedrooms proposed is not excessive, given the physical constraints of the site and heritage sensitivity. There

is a current need for additional hotel bedrooms in Edinburgh and this city centre location and building type is suited to a development of this nature.

The proposed Class 3 uses are ancillary to the hotel use, although the criteria of LDP Policy Ret 11: Food and Drink Establishments has been considered in the assessment of these uses. The proposed café/restaurants and bars in this busy city centre location, where there are many existing such establishments, will not cause any significant disruption for residents. These uses will be located at ground floor level with active frontages to Princes Street and Rose Street contributing to the vitality of the area.

LDP Policy Ret 7 supports entertainment and leisure developments in this location, provided:

- the proposal is compatible with surrounding uses and will not lead to a significant increase in noise, disturbance and on-street activity at unsocial hours to the detriment of living conditions for nearby residents; and
- the development will be easily accessible by public transport, foot and cycle. There are no residential properties in close proximity to the basement of the Princes Street premises in which the gym/spa will be located and the site is on a major bus route, in close proximity to a tram stop and easily accessible by foot or cycle.

The development is therefore acceptable in principle as it will sustain and enhance the city centre and its various roles including retail, commercial leisure and tourism-related activities, in compliance with LDP Policies Del 2, Ret 1, Ret 9, Emp 10 and Ret 7.

## **b) Character and Setting of Listed Buildings**

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

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

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

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

LDP Policy Env 3 states that development within the curtilage or affecting the setting of a listed building will only be permitted if not detrimental to the appearance or character of the building or its setting.

## Character of 112 and 109-110 Princes Street

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

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

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

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

will distinguish these modern additions from the reconstructed historic dormers to demarcate clearly the evolution of the original façade over time.

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

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

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

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

The existing glazed link structure at 111 Princes Street is part of the late 1970's redevelopment and comprises an architecturally lightweight, contemporary solution to connecting the two listed buildings. The link of is no special architectural significance, so its replacement is acceptable in principle. The new link is a more assertive, but complementary solution which involves a traditional arcaded form drawing on the double-height elements and rhythm of openings within the facades of the flanking listed buildings. The arcaded form allows for an appropriate level of depth and detailing in this context of Victorian architecture and signals the use of the ground floor level as an arcade linking through from Princes Street to Rose Street. The increased façade height compared to the existing link structure will have no detrimental impact on the appearance or visual prominence of either listed building, given the delicate nature of the arcaded architecture and the fact that views of both buildings looking along Princes

Street are already interrupted by projecting elements of the flanking buildings. Only a restricted area of the more visible east gable chimney of no. 112 will be obscured in west-looking views, given that the top levels of the proposed infill are set back and the chimney stacks of no. 112 will be raised up. The slated, mansard-type roof on the arcaded link references the mansard roof forms of the listed buildings and the use of GRC for the arched frame elements is appropriate in order to achieve a delicate and detailed structure in a complementary warm-grey tone.

### Setting of Listed Buildings

The listed buildings affected to any significant extent by this development in terms of setting comprise those on the application site and the category A listed building on the south-east corner of Rose Street and Rose Street South Lane, dating from 1780 with later extensions. This building incorporates the Kenilworth bar at ground and first floor level. The settings of all these buildings have been comprised significantly through successive and cumulative developments since they were erected, in particular the loss of the original building hierarchy which reduced in height from Princes Street to the service lanes behind and rose again in George Street, with the natural topography creating a height increase from Princes Street to George Street. The impact of the proposed rooftop additions on the wider topography of the Waverley Valley with views across to the Old Town and Edinburgh Castle is assessed in the following sections, but the proposed modest-scale and low-lying rooftop addition has no significant or detrimental impact on this setting.

For the majority of these buildings, the setting will be enhanced through the replacement of a utilitarian and unbroken concrete slab structure with a refined and detailed building with a plan form incorporating a lightwell, articulation at rooftop level and a rear elevation with rhythmic window openings alluding to the Victorian tenement that was still standing on this site in Rose Street South Lane in 1976, according to an oblique aerial photograph of this date. Whilst it is not possible to gauge the height of this tenement from the photograph, it appears to be five or six storeys with a mansard attic.

The proposed replacement structure to the rear of 112 Princes Street is undoubtedly higher than this historic tenement and will not provide the visual relief that the canted upper floors of the existing concrete structure gives at present in terms of dominating the setting of 152 and 154 Rose Street and 112-114 Rose Street South Lane. In this respect, the overall height of the new structure will have a detrimental impact on the setting of this category A listed building. However, this is one aspect of the listed building's setting and the new building on the lane will only be visible as a backdrop from one particular location in Rose Street, i.e. the west junction of Rose Street and Rose Street South Lane. The most significant part of this listed building is its front section containing the Kenilworth bar and the proposed new building will have the greatest visual impact on the later rear addition. Also, the stepped form, detailing and materials of the proposed structure have been designed and used carefully to maintain the visual prominence of the rear roof of the listed building. Historic Environment Scotland concurs that, taking into consideration the wider urban context and significance of the listed building, the development would overall not have a significant detrimental impact on the setting of this particular listed building.

Whilst acknowledging this detrimental element of the proposed development in terms of height domination, it is limited to a specific part of the setting of the listed building and offset by the proposed façade design and less austere, utilitarian appearance. Overall therefore, the new development will not affect the setting of this listed building to an unacceptably adverse extent.

With reference to the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 the proposals preserve the adjacent listed buildings and their settings including any special architectural or historic interest they possess, in compliance with LDP Policies Env 4 and Env 3.

### **c) Character and Appearance of Conservation Area**

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

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

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

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

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

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

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

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

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

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

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

Whilst there will be a significant increase in mass within Rose Street South Lane, this element of the development will only be visible from the junction of Rose Street and the lane and from within the lane. The former view is transient and the increased mass will be offset by a more visually appropriate and interactive elevation than the existing blank, functional frontage. Also, the historic character of the lane has been severely

eroded by large rear blocks erected mainly in the 20th century as additions to commercial premises on Princes Street, so the proposed building will have no detrimental impact on the character or appearance of this part of the First New Town.

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

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

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

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

#### **d) Outstanding Universal Value of World Heritage Site**

The Outstanding Universal Value (OUV) of the Old and New Towns of Edinburgh World Heritage Site is defined as the remarkable juxtaposition of two clearly articulated urban planning phenomena: the contrast between the organic medieval Old Town and the planned Georgian New Town which provides a clarity of urban structure unrivalled in Europe.

This site is not located within the viewpoints identified in the Skyline Study referenced in the Edinburgh Design Guidance, nor is it a notable feature in views from the Old Town, so the proposed development will not affect the iconic skyline quality that contributes to the OUV of the World Heritage Site.

From the elevated views of the Castle ramparts, Esplanade and Mound Place, the new roofscape will have an impact on existing views. However, the hierarchy of buildings

rising from Princes Street to George Street, which is a key element of the OUV, will not be affected to any significant or harmful extent as explained in section 3.3 c) above. Historic Environment Scotland states that, while the scope of changes would mean some impacts on the existing roofline and on the OUV, these changes would not have a significant impact.

The development will have no detrimental impact on the character or appearance of the Georgian New Town, nor its relationship with the medieval Old Town and will cause no harm to the Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site, in compliance with LDP Policy Env 1.

#### **e) Designed Landscape**

The site is located within the New Town Gardens Designed Landscape which comprises an internationally recognised series of 18th and 19th century town gardens, squares and walks.

The proposed development is of appropriate scale and the sensitive and elegant design of the new arcaded infill structure with recessed planted arches will complement the historical and landscape interest of the Gardens, in compliance with LDP Policy Env 7.

#### **f) Sustainability, Design and Sense of Place**

LDP Policy Des 1 provides that the design of a development should be based on an overall concept which draws upon the positive characteristics of the surrounding area, to create or reinforce a sense of place, security and vitality. It further provides that planning permission will not be granted for poor quality or inappropriate design, or for proposals which would be damaging to the area's character or appearance, particularly where this has a special importance. Likewise, LDP Policy Des 3 supports development where it is demonstrated that the existing characteristics and features worthy of retention on the site and in the surrounding area have been identified, incorporated and enhanced through its design. LDP Policy Des 4 states that development should have a positive impact on its surroundings in terms of height and form, scale and proportions and materials and detailing.

The proposed development will create attractive internal and external public spaces for people in which to experience the proposed mixed tourism, commercial and leisure uses, in particular, a publicly accessible rooftop bar with two outdoor terraces providing spectacular views southwards across Princes Street Gardens to Edinburgh Castle and the Old Town, eastwards to Calton Hill and northwards over Edinburgh and the Firth of Forth into Fife. The original grand stair of no. 112 will be relocated to form the focal point of a new centrepiece atrium with flexible spaces within and around and a large rooflight providing views of the open lightwell above.

The applicant has prepared a retail, performance and art curation strategy for these flexible spaces which can be changed and adjusted throughout the year, including use during the Festival as performance/exhibition spaces. A retail and hospitality programme is also proposed to showcase local artisans and producers, involving the use of pop-up retail units and the various hospitality outfits. Spaces within the

development also have the flexibility to be used for community focused talks and cultural and music events and there are facilities for wellness programmes.

The design concept of the proposed development draws upon the positive characteristics of the site and surrounding area, creating a new destination building and reinforcing the existing sense of place. The importance of the development's setting within the townscape and roofscape of the First New Town has been recognised in the design and key views of the site from elevated positions looking over the Waverley Valley have been considered in the proposed heights, roof forms, elevations and materials at all levels. The result is a coherent and integrated design in terms of both close up and distant views.

LDP Policy Des 6 supports new development that meets the current carbon dioxide emissions reduction target, with at least half of this target met through the use of low and zero carbon generating technologies and incorporates other features that will reduce or minimise environmental resource use and impact.

The proposed development seeks to achieve a BREEAM Excellent, Gold Standard of carbon reduction through the creation of a long-term sustainable asset which protects the important historic assets. The use of existing historic assets is a sustainable measure in its itself, although the demolition of the existing 1970's structures is necessary to achieve a superior built complex in terms of carbon reduction over time. The proposed construction materials are mainly natural, avoiding the use of uPVC. The new structures will exploit solar gain from extensive areas of glazing and the proposed heating system comprises multi-purpose heat pumps with heat-recovery fan coils, rather than gas-fuelled combined heat and power (CHP). Photovoltaic panels were considered but have been discounted due to the fact that these would have a detrimental impact on the historic roofscape in this particular location.

The incorporation of green/brown/blue roofs on the flat roof area was explored, but the use and restricted areas of the external terraces would preclude such roofs. Whilst the principal upper roof areas would be more technically suitable for green/brown/blue roofs, this would result in an increase in height which would have a significant impact from elevated views in terms of preserving the historic architectural hierarchy and blending in with the traditional roof materials and tones of Princes Street. However, means of harvesting rainwater for the irrigation of soft landscaping on the terraces are being explored and a diagram has been submitted indicating a location for rainwater storage.

As regards surface water management, there will be no increase in the volume of surface water discharged from the site as the existing footprint will not increase and Scottish Water has accepted this approach. Foul drainage will be discharged to the combined sewer network and there is capacity in Edinburgh PFI Water Treatment to service the development as confirmed by Scottish Water.

LDP Policy Des 7 supports development which enhances community safety and urban vitality and provides direct and convenient connections on foot and by cycle and LDP.

In terms of sustainable transport, the site is located in the heart of the city centre directly opposite the Princes Street tram stop, on a major bus route and within easy

walking distance of Waverley Station. Also, secure off-street cycle parking will be provided and no car parking is proposed.

A new pedestrian link will run through the building from Princes Street to Rose Street to increase pedestrian permeability. There is a current route through the existing building, but it is convoluted and confusing involving level change and lateral movement, whereas the proposed "arcade" route is direct with a change in level only. The interactive Rose Street South Lane elevation will enhance public safety in the lane through light provision and overlooking windows.

A further sustainability measure will be the provision of dedicated recycling holding areas within the development in accordance with the requirements of the Edinburgh Design Guidance.

In conclusion, the design of the development is based on a strong sustainable concept which draws upon the positive characteristics of the site and surrounding area and creates a new sense of place, in compliance with LDP Policy Des 1, Des 3, Des 4, Des 7 and Des 8.

### **g) Archaeological Remains**

The site lies within an area of considerable archaeological significance, at the centre of Princes Street and within the First New Town and World Heritage Site. The site has a complex development history since first developed in the late-18th century and the proposed plans involve significant demolitions and alterations to the existing listed buildings. These works may also reveal areas of earlier surviving historic fabric which could provide evidence of the development of these buildings and this section of the First New Town.

Accordingly, conditions have been applied to ensure that a programme of archaeological work is carried out during development to both record and conserve the site's historic fabric. A Written Scheme of Investigation has been undertaken and submitted already in consultation with the City Archaeologist, so the standard suspensive condition has been modified accordingly.

### **h) Residential Amenity**

The site is located within the commercial city centre core and is surrounded by retail and commercial premises to the west, east, north-west and north east. The nearest residential dwellings are above the Kenilworth bar and above commercial premises to the east in Rose Street. This street is a mix of commercial properties mainly at the lower levels with some residences on the upper floors.

A noise impact assessment (NIA) has been submitted in support of the application and Environmental Protection has no objections to the development subject to specific conditions to ensure that noise levels affecting the residential properties on Rose Street will meet the required standards. These conditions, including restrictions on the proposed Class 3 use in the Rose Street unit, have been applied.

The proposed ground floor café/bar and restaurant are included within the main body of the hotel and are entered off Princes Street and the rooftop bar and external terraces

are to the front overlooking Princes Street. Any noise generating from these areas is unlikely to have an impact on residential amenity. The spa proposed within the lower ground floor will not cause any significant disruption to the adjacent residential properties in terms of noise and vibrations.

The applicant has also provided a ventilation supporting statement which confirms that cooking odours from the two kitchens will be extracted to above Princes Street roof height in compliance with the environmental requirements.

In terms of any effects on privacy or daylighting for nearby residences, the daylight and sunlight analysis included in the submission shows that any impacts in terms of overshadowing will be minimal, given the scale and proximity of the existing structures to these properties. No windows of residential properties directly face the site on Rose Street South Lane at present, so there are no privacy concerns with the proposed hotel bedroom windows on the north elevation.

The development will therefore have no unacceptable detrimental impact on residential amenity, in accordance with LDP Policy Des 5.

### **i) Road Safety and Infrastructure**

The development will not generate any significant additional traffic and will support and encourage the use of sustainable transport. The site is within easy walking distance of major public transport links, including the national rail network and no car parking is proposed. Secure cycle parking spaces will be provided within the new building in compliance with the levels specified by the Council's 2017 parking standards in Zone 1 and will include associated changing facilities. Also, an informative has been applied recommending the development of a Travel Plan by the applicant to further encourage the use of sustainable modes.

The introduction of a new pedestrian link through the buildings from Princes Street to Rose Street will improve connectivity within this block and in the wider context.

As regards the public realm, the Council has no detailed design plans at present for works to Princes Street and the service lanes, so there is currently no mechanism within the supplementary guidance to obtain developer contributions for public realm improvements. However, the applicant has confirmed that any areas on public land disturbed by the development works will be reinstated on a like-for-like basis to ensure that the surfaces integrate with the current hard landscaping materials.

In terms of servicing, the new development will be serviced via Rose Street South Lane as per the previous retail arrangement. All deliveries and refuse collection will take place at this location and it is anticipated that hotel servicing will mainly take place during the morning in compliance with the current servicing restrictions.

The applicant will be required to contribute the sum of £11,970 towards the tram infrastructure as follows:

- existing retail use: 10,596sqm = £733,243 (Zone 1)
- 207 bedroom hotel: = £636,357
- proposed restaurant/bar: 612sqm = £108,856
- total = £745,213
- net amount due = £745,213 - 733,243 = **£11,970**

No contribution is due for the proposed retail, office or health club uses.

The developer has agreed to this contribution and it is recommended that the required sum is secured through a S69 legal agreement due to the relatively small amount.

The proposed development will therefore have no detrimental impact on road safety or infrastructure, in compliance with LDP Policies Tra 2 and Tra 3.

#### **j) Biodiversity**

No bat survey is required before the proposed demolition works commence as the relative age and form of the existing building roof is not considered to be a likely habitat for roosts, despite the proximity of Princes Street Gardens.

#### **k) Equalities and Human Rights**

The development respects the provisions of the Equality Act 2010 by including accessible access throughout the building, including all lift cores. Due to the need for the protection of certain historic assets, not all bedrooms are accessible, but bedrooms in this category only amount to approximately 8% of the total provision.

#### **l) Public Comments**

New Town and Broughton Community Council

No comments received.

#### Material Objections

The Architectural Heritage Society of Scotland

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

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

### Support Comments

#### The Cockburn Association

- the loss of an established and prominent department store is unfortunate, but the proposals are consistent with the ongoing and necessary diversification of uses along Princes Street as part of the City Centre Transformation Project;
- the historically significant parts of the listed buildings will be preserved and safeguarded for the future;
- the current 1978 glazed infill façade is not aesthetically successful and the proposed new façade infill will positively re-establish the building's identity;
- the creation a new pedestrian link between Princes Street and Rose Street is particularly desirable and will improve the general amenity, appearance and environmental quality of the lane and Rose Street.

#### Other Support Comments

- the development will assist the Edinburgh economy, enhance the World Heritage Site and generally improve the environment;
- the works will preserve the historic listed facades and historic interior details, e.g. the staircase and stained glass and the new infill will bring together all the elements of the western half of this block and reflect features elsewhere in Princes Street;
- the proposed rooftop bar is a real asset with public access which will allow fabulous views to the Castle and the increased height does not intrude.

### **Conclusion**

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

The proposals comply with the adopted Local Development Plan policies and non-statutory guidelines and have no adverse effect on the Outstanding Universal Value of the World Heritage Site or the designed landscape. The development is sustainable has no detrimental impact on significant archaeological remains, residential amenity, road safety, infrastructure or biodiversity. There are no identified impacts on equalities or human rights and no material considerations that outweigh this conclusion.

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

### 3.4 Conditions/reasons/informatives

#### Conditions:-

1. No demolition shall start until the applicant has confirmed in writing the start date for the new development by the submission of a Notice of Initiation.
2. A detailed specification, including trade names where appropriate and sources, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
3. A programme of archaeological works, in the form of a Watching Brief during construction works, shall be undertaken to mitigate any potential impacts on archaeological remains. Details of this programme shall be submitted to and approved in writing by the Planning Authority, having first been agreed by the City Archaeologist.
4. The hotel kitchen ventilation shall be installed and operational in accordance with the supporting ventilation statement (RSP Consulting Engineers dated 17th November 2020) and shown in drawing 200102-RSP-01-09-DR-M-SK57001, dated 09/02/20, prior to the hotel use commencing.
5. If the commercial unit fronting Rose Street is taken up in Class 3 use, cooking equipment for use within the premises shall be restricted to a microwave, panini machine and soup kettle only.
6. The noise control measures as specified within RMP Noise Impact Assessment Technical Report R-8811-DJC-RRM4 (dated 23th March 2021) and Addendum L-8811-DJC-RRM4 dated 19th April 2021 shall be implemented prior to the uptake of the approved uses on site, including the following:
  - a. the separating walls and ceilings of the commercial unit fronting Rose Street as shown on drawing PL (00) 112 Rev E, dated October 2020;
  - b. the minimum glazing specification of  $R_w + C_{tr}$  38 dB for the commercial unit fronting Rose Street as shown on drawing PL (00) 112 Rev E, dated October 2020;
  - c. the maximum cumulative plant noise levels incorporating acoustic louvres, as shown in table 10 of RMP technical report L-8811-DJC-RRM4, dated 19th April 2021 and on drawings PL (00) 114 Rev B, PL 115 Rev B, PL (00) 119 (Rev A) and PL (00) 121 Rev A, all dated October 2020; and
  - d. the lobby doors as shown on drawing PL (00) 112 Rev E, dated October 2020, if the commercial unit fronting Rose Street is in operation as a Class 3 restaurant.

Confirmation shall be provided by a suitably qualified engineer to confirm that the maximum cumulative plant noise levels, sound insulation and glazing specifications have all been installed and the specified criteria met.

## **Reasons:-**

1. In order to safeguard the character of the conservation area.
2. In order to enable the planning authority to consider this/these matter/s in detail.
3. In order to safeguard the interests of archaeological heritage.
4. In order to safeguard the amenity of neighbouring residents and other occupiers.
5. In order to safeguard the amenity of neighbouring residents and other occupiers.
6. In order to safeguard the amenity of neighbouring residents and other occupiers.

## **Informatives**

It should be noted that:

1. Consent shall not be issued until a suitable legal agreement has been concluded to secure a tram contribution of £11,970.

The legal agreement should be concluded within 6 months of the date of this notice. If not concluded within that 6 month period, a report will be put to committee with a likely recommendation that the application be refused.

2. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
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. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport.
6. The proposed site is adjacent to the operational Edinburgh Tram. An advisory note should be added to the decision notice, if permission is granted, noting that it would be desirable for the applicant to consult with the tram team regarding construction timing. This is due to the potential access implications of construction / delivery vehicles and likely traffic implications as a result of diversions in the area which could impact delivery to, and works at, the site.

Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Council and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:

- Any work where part of the site such as tools, materials, machines, suspended loads or where people could enter the Edinburgh Tram Hazard Zone. For example, window cleaning or other work involving the use of ladders;
- Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone;
- Piling, using a crane, excavating more than 2m or erecting and dismantling scaffolding within 4m of the Edinburgh Trams Hazard Zone;
- Any excavation within 3m of any pole supporting overhead lines;
- Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when the equipment is in use;
- The Council has issued guidance to residents and businesses along the tram route and to other key organisations who may require access along the line.

See our full guidance on how to get permission to work near a tram way  
<http://edinburghtrams.com/community/working-around-trams>

## **Financial impact**

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### **4.1 The financial impact has been assessed as follows:**

The application is subject to a legal agreement for developer contributions.

## **Risk, Policy, compliance and governance impact**

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5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

## **Equalities impact**

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### **6.1 The equalities impact has been assessed as follows:**

This application was assessed in terms of equalities and human rights. The impacts are identified in the Assessment section of the main report.

## **Sustainability impact**

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### **7.1 The sustainability impact has been assessed as follows:**

This application meets the sustainability requirements of the Edinburgh Design Guidance.

## Consultation and engagement

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### 8.1 Pre-Application Process

Pre-application discussions took place on this application with Historic Environment Scotland and Edinburgh World Heritage. There was no input from the Edinburgh Urban Design Panel.

A public consultation event (PAC) in the form of a live online consultation forum with a question and answer session by interactive text took place on the project website on Thursday 17 September 2020 between 4.00pm and 7.00pm. The project website went live on 10 September 2020 and the PAC event was advertised in the Edinburgh Evening News on 10 September 2020. Details of the event were sent to parties who received a copy of the PAN in advance of the PAC event as follows:

- New Town Broughton Community Council
- Old Town Community Council
- City Centre Ward Councillors Doran, Miller, Mowat and Rankin
- The Edinburgh Partnership Board
- South East Locality Community Planning Partnership
- Essential Edinburgh;
- Edinburgh Chamber of Commerce
- Historic Environment Scotland
- Edinburgh World Heritage
- The Cockburn Association.

In addition, a copy of the PAC advert was hand-posted to the commercial and residential properties that neighbour the application site on 10 September 2020 and two notices advertising the PAC event were erected on street furniture to the north and south elevations of the site.

### 8.2 Publicity summary of representations and Community Council comments

The application was advertised on 18 January 2020. A total of three representations were received, comprising one objection from the Architectural Heritage Society of Scotland and two comments in support, one from the Cockburn Association.

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

### Background reading/external references

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- To view details of the application go to
- [Planning and Building Standards online services](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development  
Plan Provision**

The site is located within the City Centre as defined in the Edinburgh Local Development Plan.

**Date registered**

9 December 2020

**Drawing numbers/Scheme**

1,2,03A,4-14,15A,16-28,29A-38A,39,40A,41,42A-49A+50-56,

Scheme 1

**David Givan**  
**Chief Planning Officer**  
PLACE  
The City of Edinburgh Council

Contact: Clare Macdonald, Senior Planning Officer  
E-mail: [clare.macdonald@edinburgh.gov.uk](mailto:clare.macdonald@edinburgh.gov.uk)

## **Links - Policies**

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### **Relevant Policies:**

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

LDP Policy Del 2 (City Centre) sets criteria for assessing development in the city centre.

LDP Policy Ret 1 (Town Centres First Policy) sets criteria for retail and other town centre uses following a town centre first sequential approach.

LDP Policy Ret 9 (Alternative Use of Shop Units in Defined Centres) protects the City Centre Retail Core and Town Centres from development which would undermine their retailing function, and specifies that detailed criteria for change of use will be set out in supplementary guidance. It provides criteria for assessing the change of use of a shop unit to a non shop unit in local centres.

LDP Policy Emp 10 (Hotel Development) sets criteria for assessing sites for hotel development.

LDP Policy Ret 11 (Food and Drink Establishments) sets criteria for assessing the change of use to a food and drink establishment.

LDP Policy Ret 7 (Entertainment and Leisure Developments - Preferred Locations) identifies the City Centre, at Leith and Granton Waterfront and town centres as the preferred locations for entertainment and leisure developments.

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 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 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.

LDP Policy Env 7 (Historic Gardens and Designed Landscapes) protects sites included in the national Inventory of Gardens and Designed Landscapes and other historic landscape features.

LDP Policy Des 1 (Design Quality and Context) sets general criteria for assessing design quality and requires an overall design concept to be demonstrated.

LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

LDP Policy Des 7 (Layout design) sets criteria for assessing layout design.

LDP Policy Env 9 (Development of Sites of Archaeological Significance) sets out the circumstances in which development affecting sites of known or suspected archaeological significance will be permitted.

LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

LDP Policy Del 1 (Developer Contributions and Infrastructure Delivery) identifies the circumstances in which developer contributions will be required.

LDP Policy Tra 2 (Private Car Parking) requires private car parking provision to comply with the parking levels set out in Council guidance, and sets criteria for assessing lower provision.

LDP Policy Tra 3 (Private Cycle Parking) requires cycle parking provision in accordance with standards set out in Council guidance.

LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

### **Relevant Non-Statutory Guidelines**

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

NSESBA - **Non-statutory guidelines** Part A of 'The Edinburgh Standards for Sustainable Building' requires new development in Edinburgh to reduce their carbon emissions in line with the current Building Regulations

**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.

**The New Town Conservation Area Character Appraisal** states that the area is typified by the formal plan layout, spacious stone built terraces, broad streets and an overall classical elegance. The buildings are of a generally consistent three storey and basement scale, with some four storey corner and central pavilions.

### **Relevant Government Guidance on Historic Environment.**

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

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

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

# Appendix 1

**Application for Planning Permission 20/05444/FUL  
At 109, 110 And 111 Princes Street, 112 Princes Street And  
144-150 Rose Street, (Debenhams)  
Proposed redevelopment + change of use of existing  
premises to form hotel with rooftop bar/restaurant, active  
uses at lower floors including restaurant/bar/retail/flexible  
meeting/event/venue space, health suite/gym, together with  
ancillary uses, associated works/alterations/demolitions  
(use classes 1/2/3/4/7/11 and sui generis).**

## Consultations

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### Historic Environment Scotland

*We have been involved in several pre-application discussions on the development of this proposal. We can see how impacts on the historic environment have been reduced. Given the scope of the proposals, it is inevitable that some adverse or negative impacts will remain. Overall, we are content that that these would not have a significant damaging impact.*

*You have asked for our views on the potential impact on the historic assets listed above. Taking these in turn:*

#### *Setting of 152 and 154 Rose Street (Kenilworth Bar)*

*This A-listed building is significant as a surviving building of the first New Town and for the quality of the Victorian pub frontage and interior. The proposed new development would be highly visible from the junction of Rose Street and Rose Street Lane South. From this one viewpoint the proposals would therefore have a negative impact. However, taking into consideration the wider urban context and significance of the listed building, we are of the view that development would overall not have a significant detrimental impact.*

#### *Outstanding Universal Value (OUV) of the Old and New Towns of Edinburgh World Heritage Site*

*109-12 Princes Street are visible in views from the Old Town and the Castle. Despite now being interconnected, they still have the appearance of independent buildings - contributing to the mix of uses and architectural styles along Princes Street, along with a varied roofline. The juxtaposition of the Old and New Towns is a key attribute from of the OUV of the World Heritage Site.*

*Our aim during pre-application discussions was to see retention of the prominence and individuality of the frontages. We can see how the proposals have evolved and the impact of rooftop alterations / additions have been reduced since pre-application. While the scope of changes would mean some impacts on the existing roofline and on OUV, we are of the view these changes would not have a significant impact.*

*We note the proposals now would increase the height of the roof and the chimney stacks. We consider this primarily to be a listed building consent (LBC) issue and have provided further comment on this issue in response to the LBC consultation.*

*The New Town Gardens (Inventory of Gardens and Designed Landscape)*

*As the proposals are for the alteration, albeit extensive in places, to the existing buildings any impact of The New Town Gardens would be minor in nature.*

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

## **Edinburgh World Heritage**

*This advice is in line with our pre-application engagement on this case, of which you are aware.*

*The principal focus of Edinburgh World Heritage is the impact on the Outstanding Universal Value (OUV) of the 'Old and New Towns of Edinburgh' World Heritage Site ('the World Heritage Site' or 'WHS'). Therefore, proportional comment may be made on impact upon individual heritage assets (e.g. Listed Buildings and Conservation Areas), but only to the extent that this impacts upon the city's overall OUV. The Local Planning Authority should therefore give additional consideration to individual heritage assets affected, beyond the scope of our comments, in line with planning policy and legislation.*

## **OUTSTANDING UNIVERSAL VALUE**

*The OUV of the World Heritage Site is well-established in the UNESCO inscription, and will therefore not be repeated here. Very broadly, this has broken this down into 5 overarching qualities which can be found on our website.*

*Due to the nature and location of the proposed development, the following elements of the World Heritage Site's Outstanding Universal Value are most likely to be affected.*

- 'A Model City': The Old and New Towns embody the changes in European urban planning from inward looking, defensive walled medieval cities, through 18th and 19th centuries formal Enlightenment planning, to the 19th century revival of the Old Town with its adaptation of a Baronial style of architecture in an urban setting.*
- 'City of Contrasts': The survival of two contrasting styles of urban development: the organic*

multiple layers of the medieval Old Town and the enlightened, spacious, ordered elegance of the New Town.

- 'Iconic Skyline': The dramatic hills and green spaces of the landscape, plus key buildings of the Old and New Towns give Edinburgh its iconic skyline that has inspired generations of artists, writers, visitors and residents.

Specifically, Princes Street is a key street of Edinburgh's First New Town, and is highly visible in views which are important to the appreciation of the World Heritage Site's OUV as outlined above. Of particular note in the context of this application are views from the Old Town into the New Town across Waverley Valley, from which the OUV associated with the juxtaposition of the Old and New Towns, the formalized planning of the New Town and characteristic roofscape of Edinburgh can all be appreciated.

The site is considered to make a positive contribution to the overall OUV of the World Heritage Site and to the contribution to OUV made by associated heritage assets.

### IMPACT ON OUTSTANDING UNIVERSAL VALUE

Edinburgh World Heritage raised concerns at pre-application stage regarding the harmful impact of developing proposals for the site on the OUV of the World Heritage Site. The principal element of the proposal which could impact in this regard is the proposed upper levels of the development. For this reason, our comments focus on this aspect of the proposal. As outlined in the preceding section, the high-ground views across Waverley Valley to Princes Street make a positive contribution to understanding and appreciating the values of the World Heritage Site's OUV. The view from Edinburgh Castle (AVR3) provided is one example of such a view, and others across the valley (e.g. from New College) merit careful consideration by the council. The existing buildings of the site are particularly tall within the context of Princes Street. Therefore, further massing addition to their upper levels would have a particularly high visibility and impact on (in particular) long views. This also creates the potential for height precedent setting along Princes Street which would be detrimental to its character and OUV.

While we appreciate the efforts made to minimise the impact of the upward extension, the proposals formally submitted would cause significant harm to the OUV of the World Heritage Site outlined in the preceding section, for the following principal reasons;

- The harmful impact on the characteristic roofscape and legible planned form of the New Town as a result of increased heights to an already unusually tall building in the streetscape, and blocky/visually dominant massing
- The additional impact from the above as a result of night-time lighting of the 'skybar' and impact on after-dark views of the city
- The harmful impact of larger visual massing to Rose Street, which would not support the characteristic New Town hierarchy of streets - with Rose Street being characteristically secondary to the principal routes in its architecture, height and urban grain.

### RELEVANT POLICY and LEGISLATION

In addition to the duties, legislation and policies relating to individual heritage assets, the following are those most pertinent to the World Heritage Site in this case (not exhaustive):

- Duty to protect, conserve and present OUV for future generations (UNESCO)

- Where a development proposal has the potential to affect a World Heritage Site, or its setting, the planning authority must protect and preserve its Outstanding Universal Value (Scottish Planning Policy, 147)
- The siting and design of development should take account of all aspects of the historic environment (Scottish Planning Policy, 140)
- Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and/or the Forth Bridge as World Heritage Sites or would have a detrimental impact on a Site's setting will not be permitted. This policy requires development to respect and protect the outstanding universal values of the World Heritage Sites and their settings. Setting may include sites in the immediate vicinity, viewpoints identified in the key views study and prominent landscape features throughout the city (Edinburgh Local Development Plan, Policy Env 1 World Heritage Sites)
- Ensure that the Outstanding Universal Value of the WHS is taken into account in planning decisions (WHS Management Plan 2017-22)

## RESULTANT POSITION

*Whilst we appreciate the efforts made to reduce the level of harm caused by the proposed upper level, the proposals would still cause a considerable level of harm to the OUV of the World Heritage Site as outlined above. In line with the above legislative and policy considerations, we therefore raise serious concern regarding these proposals and recommend from a heritage perspective that they are refused. Should the proposals be amended to remove this upper level element, we would have no objection to the proposals from a WHS perspective.*

*We further note that Princes Street it is at a key point in its history - re-forming in the context of Covid19, and we encourage great care to be given to setting precedent at this formative period. This is particularly important given the already considerable height of the buildings in the Princes Street context and the potential for any approval to influence future development of this key historic street and its many associated views. As always, we advise you engage the heritage expertise within your planning department to inform the wider heritage considerations and detail of this application.*

## Archaeology

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

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

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

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

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

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

*'No demolition or development shall take place on the site until the applicant has secured and implemented a programme of archaeological work (excavation, conservation, reporting and analysis, publication, public engagement) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.'*

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

## **Environmental Protection**

*I refer to the above and would advise that Environmental Protection has no objections to the proposed development subject to the conditions recommended below.*

*The application proposes the redevelopment and change of use from retail to hotel with ancillary uses. Retail and commercial premises surround the site to the west, east, north-west and north east. Residential dwellings exist above the Kenilworth pub and above commercial premises to the east overlooking Rose Street. Rose Street itself is a mix of residential and commercial properties.*

*Included within the proposal are a spa and fitness suite on ground floor and a new ground floor commercial unit between Rose Street and Rose Street South Lane. The hotel itself will include a ground floor bar/café area and a rooftop bar on level 9.*

## Noise

*A noise impact assessment (NIA) has been provided in support of the application which considers the different noise aspects associated with the development. The noise impact assessment advises that residential properties surround the application site on Rose Street and so noise has been assessed and mitigation recommended to ensure noise will meet this team's required standards within the adjacent residential properties.*

*The application proposal includes considerable levels of plant including air handling units and ventilation proposals and these have been considered within the noise impact assessment. Mitigation in the form of louvres and attenuators are to be installed to ensure maximum noise limits for plant are achieved. The measures have been outlined within the NIA (louvres and plant specifications) and supporting ventilation document (duct mounted attenuators will be provided on both the building and atmospheric side of all ventilation plant to control noise generated by the fans. Additional attenuation shall be provided within the vertical risers of the bedrooms to prevent crosstalk noise where required). These measures have been recommended within a condition below ensuring maximum plant noise levels are not exceeded when in situ.*

*Initially, the application was to include a ground and lower ground floor bar/performance space (Class 11) with the entrance/exit to be from Rose Street. Environmental Protection highlighted this as an areas of noise concern and advised that significant measures would be required to ensure that noise from the associated operations did not impact upon existing surrounding residential properties. Subsequently, the agent for the application has confirmed that this aspect of the proposal has been deleted and the proposed commercial unit will now only be Class 1, 2 or 3. In this regard, mitigation in the form of sound insulation has been included to ensure that any of the commercial uses (Classes 1, 2 or 3) will not impact upon the surrounding residential amenity. Double lobby doors have also been included and are recommended should the premises be utilised as a Class 3 premises in the future.*

*A ground floor café/bar and restaurant are included within the main body of the hotel premises and are entered off Princes Street. Noise from this area is likely to be encapsulated within the building itself. In addition, a 9th floor rooftop bar and external terrace area are also proposed. The external areas are to the front overlooking Princes Street and so unlikely to impact upon residential amenity.*

*A spa is proposed within the lower ground floor within the Rose Street aspect. It is understood that the spa will include treatment rooms and a small gym. Gymnasiums can cause noise and vibration issues if above, below or structurally attached to adjacent residential properties. The agent has confirmed that the spa sits only under the application property or under Rose Street South Lane and is not underneath any other adjacent properties not in ownership of the applicant. Residential properties are adjacent and up a few floors though on Rose Street above the adjacent commercial properties. The spa will be directly related to hotel operations only for use of hotel patrons and can be managed by the hotel operator should any noise issues arise from the use of the gym (e.g. by use of antivibration mats/no loose weights available for use, if required).*

*Internal noise transfer standards between hotel rooms has been considered within the NIA but this is a commercial decision for the applicant and does not constitute a*

*residential amenity issue. An acoustic standard has been chosen and designed to and is addressed by the applicant's acoustic consultant. Traffic noise from Princes Street has been assessed and measured and secondary glazing is required to provide an acceptable internal noise level for guests. Once again, this is a commercial decision for the hotel to address and is being addressed by the applicant's acoustic consultant.*

### *Air Quality*

*The application proposes multipurpose heat pumps with heat recovery serving fan coils (bedrooms), fan coils (FoH) and radiators and central ventilation plant throughout and no gas CHP is included. No parking is proposed within the development which, for the city centre location, is supported and the development appears to have been designed to support public transport and walking modes. The air quality impacts are therefore seen as limited and Environmental Protection supports the proposal in this regard.*

### *Cooking Ventilation*

*The application includes two kitchens to be found on the ground floor and on level 9. The applicant has provided a ventilation supporting statement and confirmed that odours will be extracted to above Princes Street roof height in compliance with the requirements of this team.*

*In addition to the main hotel kitchen, the commercial unit fronting onto Rose Street will be either Class 1, 2 or 3. Should the use be taken up as Class 3 then cooking odours would require to be suitably extracted or the cooking equipment proposed should be conditioned. In this regard, the applicant has confirmed the cooking equipment proposed for use within the Class 3 premises and this has been conditioned below.*

*Therefore, Environmental Protection would offer no objections to the application proposal subject to the conditions below:*

### *Conditions*

- 1. The hotel kitchen ventilation shall be installed and operational in accordance with the supporting ventilation statement (RSP Consulting Engineers dated 17 November 2020) and shown in drawing 200102-RSP-01-09-DR-M-SK57001 and dated 09/02/20.*
- 2. Should the commercial unit fronting Rose Street be taken up as Class 3, cooking equipment for use within the premises should be restricted to a microwave, panini machine and soup kettle only.*
- 3. The noise control measures as specified within RMP Noise Impact Assessment Technical Report R-8811-DJC-RRM4 (dated 23 March 2021) and Addendum L-8811-DJC-RRM4 dated 19th April 2021 should be implemented prior to start of operations on site including the following:*
  - a. The commercial unit separating walls and ceilings as shown on drawing and shown on drawing PL (00) 112 Rev E and dated October 2020 should include an independent wall lining comprising; 50mm minimum cavity with studwork incorporating 50mm mineral wool insulation between studs, finished on with 19mm plasterboard plank and 15mm SoundBloc. This treatment should also be applied to upper levels.*

b. The Rose Street fronting commercial unit should have a minimum glazing specification of  $R_w + C_{tr}$  38 dB as shown on drawing PL (00) 112 Rev D and dated October 2020.

c. Maximum cumulative plant noise levels incorporating acoustic louvres, as shown in table 10 of RMP technical report L-8811-DJC-RRM4 and dated 19th April 2021 and shown on drawings referenced PL (00) 114 Rev B and dated October 2020, PL 115 Rev B and dated October 2020, PL (00) 119 (Rev A) and dated October 2020, PL (00) 121 Rev A and dated October 2020 should be installed to comply with the levels shown in the following table:

d. If the commercial unit operates as a Class 3 restaurant, the lobby doors as shown on drawing referenced PL (00) 112 Rev D and dated October 2020 should be installed and operational prior to beginning of operations on site.

e. Confirmation should be provided by a suitably qualified engineer to confirm the maximum cumulative plant noise levels, sound insulation and glazing specifications have all been installed and criteria met prior to operations beginning on site.

## **Roads Authority**

No objections to the application subject to the following being included as conditions or informatives as appropriate:

1. The applicant will be required to contribute the sum of £20,613 (based on proposed 210 bed hotel (£645,000), 612sqm restaurant/bar (£108,856) and 268sqm health club (zero) in Zone 1, less the existing retail use of 10,596sqm (£733,243) to the Edinburgh Tram in line with the approved Tram Line Developer Contributions report. The sum to be indexed as appropriate and the use period to be 10 years from date of payment;

2. The applicant should be required to provide 42 cycle parking spaces in a secure and undercover location;

3. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including a Welcome Pack, a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport.

Note:

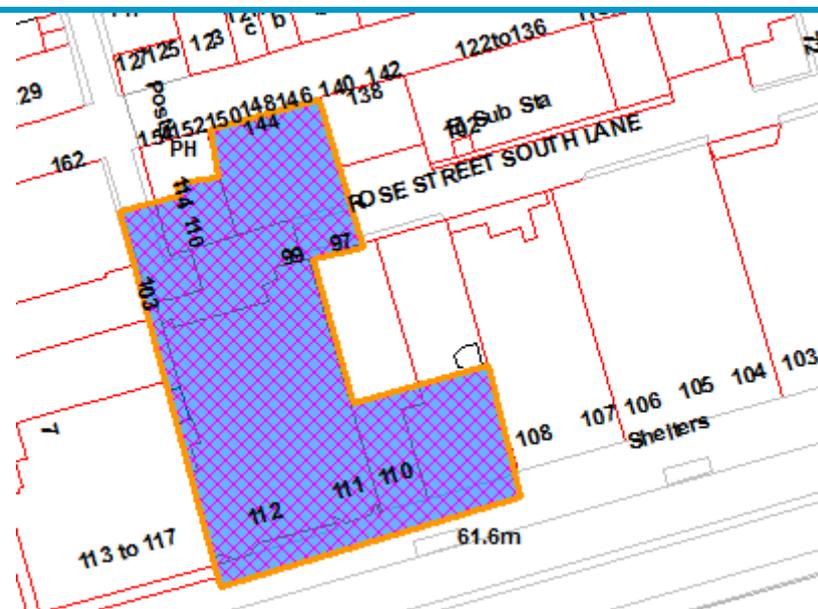
The proposed zero car parking spaces is considered acceptable.

### **TRAMS - Important Note:**

The proposed site is adjacent to the operational Edinburgh Tram. An advisory note should be added to the decision notice, if permission is granted, noting that it would be desirable for the applicant to consult with the tram team regarding construction timing. This is due to the potential access implications of construction/delivery vehicles and likely traffic implications as a result of diversions in the area which could impact delivery to, and works at, the site. Tram power lines are over 5m above the tracks and do not pose a danger to pedestrians and motorists at ground level or to those living and working in the vicinity of the tramway. However, the applicant should be informed that there are potential dangers and, prior to commencing work near the tramway, a safe method of working must be agreed with the Council and authorisation to work obtained. Authorisation is needed for any of the following works either on or near the tramway:

- Any work where part of the site such as tools, materials, machines, suspended loads or where people could enter the Edinburgh Tram Hazard Zone. For example, window cleaning or other work involving the use of ladders;
  - Any work which could force pedestrians or road traffic to be diverted into the Edinburgh Trams Hazard Zone;
  - Piling, using a crane, excavating more than 2m or erecting and dismantling scaffolding within 4m of the Edinburgh Trams Hazard Zone;
  - Any excavation within 3m of any pole supporting overhead lines;
  - Any work on sites near the tramway where vehicles fitted with cranes, tippers or skip loaders could come within the Edinburgh Trams Hazard Zone when the equipment is in use;
  - The Council has issued guidance to residents and businesses along the tram route and to other key organisations who may require access along the line.
- See our full guidance on how to get permission to work near a tram way <http://edinburghtrams.com/community/working-around-trams>

## Location Plan



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