

# Development Management Sub Committee

Wednesday 24 November 2021

**Application for Planning Permission 18/04657/FUL  
at 35 - 36 St Andrew Square, Edinburgh, EH2 2AD.  
Erection of music and performing arts venue with licensed  
café/restaurant and bar facilities, and related arrangements  
for infrastructure, demolitions, and other works. (See Cover  
Letter for full statutory description) (amended).**

**Item number**

**Report number**

**Wards**

B11 - City Centre

## Summary

---

Due to its proximity to listed buildings and being a site within a conservation area, the proposed development first requires to be assessed against Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the 1997 Heritage Act) which provide that there is a strong presumption against granting planning permission for development which would either: (i) harm a listed building or its setting; or (ii) conflict with the objective of preserving or enhancing the character or appearance of the conservation area. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

With reference to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 the proposal does not remove or detract from key characteristic components of the conservation area that gives the area its special interest. It will contribute to the architectural quality of the area with contemporary high-quality buildings, designed to respond to its historic and modern urban environment. Therefore, the proposals are considered to preserve and enhance the character and appearance of the Conservation Area

With reference to Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, it is considered that the proposed development will not have a detrimental impact on the character and setting of any adjacent listed buildings. The relationship of the new building with the setting of Dundas House is complex and will change depending on the point of reference and experience of the view. In views from the eastern and southern sides of St Andrew Square where the development will have a greater impact on its setting, the elevational design and form, including the set-back and oval form, mitigates some of these. Whilst it is agreed that the impact on more distant views along George Street is beneficial, there is still a minor adverse impact on the setting of Dundas House from the south side of St Andrew Square. Overall, however, it is concluded that the proposals preserve the setting of Dundas House and the application complies with Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

The proposed music and performing arts venue would make a valuable contribution to the city's cultural infrastructure and provide opportunities for its use by the wider community. The proposed development, which forms an important cultural strand within the City Deal, will contribute to Edinburgh's strategic aspirations in terms of culture, tourism and the economy. The location of a cultural, leisure and entertainment venue at this accessible city centre site, accords with LDP Policies Ret 1, Ret 7 and Del 2. The proposed use also complies with the relevant principles of the St James Quarter Development Brief.

The proposed venue contributes positively to the formal planned alignment of the First New Town by terminating the axial view along George Street, simplifying the backdrop to Dundas House and contributing towards the symmetry of the street. The development is, however, considered to have an adverse impact on the setting of Dundas House when seen from a public viewpoint within St Andrew Square. On the immediate approach to Dundas House, this effect will be noticeably diminished as a result of its set back position within the site. The height, scale and massing of the extension expands beyond Dundas House. However, it has been sensitively designed to reflect its immediate context and mitigate some of these impacts. In considering the scheme as a whole and against the provisions of the Development Plan and other material considerations, the development is acceptable and will make a positive contribution to the city.

The proposal has been designed to minimise any potential negative impact on its neighbours and raises no issues in respect of privacy, outlook, noise and odour. It is accepted that the proposal will infringe LDP Policy Des 5a) with respect to levels of daylight and sunlight into the neighbouring tenement building and garden space. However, this is a minor infringement given the unique urban historic context, neighbouring property relationship and the proposed public/civic use. An infringement can be justified given the existing context and wider benefits of this case.

The proposed design of the building is based on a strong concept which draws upon the positive characteristics of the surrounding area. The design seeks not to compete with the historic and distinctive built features of the New Town but rather to complement and enhance them through a positive engagement with the architecture and urban morphology of its historic setting. The overall height and form create a subtle and positive addition to the skyline, appropriate for a civic building.

Likewise, through its coordinated and high-quality public realm design, it makes a significant contribution to the delivery of placemaking within the St James Quarter area, as defined in the Local Development Plan and St James Quarter Development Brief. The proposals comply fully with LDP Policy Des 1, Des 2 and Des 4.

The proposal creates a positive social and cultural impact and will play an important role in supporting the growth and success of Edinburgh's tourism, cultural and education sector, thus being aligned with the Council's Economic Strategy, Culture Plan and City Deal framework. This is a very significant positive material consideration.

The proposal would also form an important strategic development in the city's cultural infrastructure and create a vital stimulus for live music, musicians and audiences. As well as strengthening Edinburgh as a 'Festival City', the venue would become a focal point for engagement, learning and outreach. These arise because of the development's location, being adjacent to IMPACT Scotland's offices at 35 St Andrew Square, where the National Youth Choir of Scotland will also be located. This allows the establishment of a regional training choir and singing programme for communities across Edinburgh.

The site is adjacent to bars/restaurants and other cultural venues, which are essential for the new venue to function successfully. The site also benefits from excellent active travel and public transport links, with Waverley train station 400m walking distance, Edinburgh bus station 170m away and the tram stop 100m away on St Andrew Square. It is also close to public parking. Six alternative city centre sites were considered, but none of these were suitable, available or deliverable.

The significant social, cultural and economic benefits of siting the development in this proposed location are a considerable material consideration. The wider community and cultural benefits of the proposed development are compelling and exceptional reasons for approving the proposals. On balance, the significant and exceptional social, cultural and economic benefits of siting the development in the proposed location, which are a considerable material consideration, are further reasons for approving the application.

There are also positive impacts on equalities and human rights arising from the creation of a high-quality environment and new public building in a highly accessible location. The creative learning and inclusive outreach will provide significant positive equalities benefits to many different populations including the young, old and disabled.

Overall the proposal complies with the Development Plan. There are no significant adverse material considerations that would justify refusal.

## Links

---

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

CRPNEW, LDEL01, LDEL02, LDES01, LDES02, LDES03, LDES04, LDES05, LDES06, LDES07, LDES08, LDES11, LDES12, LEN01, LEN03, LEN04, LEN06, LEN07, LEN08, LEN09, LEN12, LEN16, LEN21, LEN22, LRET01, LRET07, LRET11, LTRA01, LTRA02, LTRA03, LTRA04, HEPS, NSLBCA, NSGD02,

# Report

## **Application for Planning Permission 18/04657/FUL at 35 - 36 St Andrew Square, Edinburgh, EH2 2AD. Erection of music and performing arts venue with licensed café/restaurant and bar facilities, and related arrangements for infrastructure, demolitions, and other works. (See Cover Letter for full statutory description) (amended).**

### **Recommendations**

---

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

### **Background**

---

#### **2.1 Site description**

The application site lies within the city centre and covers an area of 0.77ha. It is located to the east of St Andrew Square, south of Multrees Walk and west of the residential tenements at St James Square and the new Edinburgh St James development beyond. New Register House and General Register House are located to the south. The Royal Bank of Scotland (RBS) branch, registered office and existing car park are currently located on the site. Existing access to the site is from St Andrew Square through Dundas House forecourt or from Register Place, to the south of the site. Elder Street to the east of the site comes to an end at a wall along the boundary of the site.

The site comprises Dundas House, a Category A listed building and its 1960's office extension and associated car park to the rear (Listed Building Reference: LB29705). In addition, the rear garden and associated boundary walls of the Category A listed 35 St Andrew Square (Listed Building Reference: LB29704) are located on the site along with the Category A listed Monument to John 4th Earl of Hopetoun in the forecourt of Dundas House (Listed Building Reference: LB27862). There are several other A listed buildings and monuments in proximity to the site:

- 35 and 37 St Andrew Square (Listed Building References: LB29704 and LB29706);
- Melville Monument (Listed Building Reference: LB27816);
- Hopetoun Monument (Listed Building Reference: LB27862);
- 38 and 39 St Andrew Square (Listed Building Reference: LB29707);
- 42 St Andrew Square (Listed Building Reference: LB29708);
- 23, 24, 25 and 26 St James Square (Listed Building Reference: LB29728);
- General Register House (Listed Building Reference: LB27636); and
- New Register House (Listed Building Reference: LB27641).

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

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

## 2.2 Site History

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

- October 2005 - Works to listed building including construction of covered link building within the existing external basement area, erection of a traditionally finished outbuilding to house goods lift and refuse bins, reinstatement of original astragal configuration to window openings to south elevation, erection of external escape stairs to rear, and landscaping of existing car park area on bunker roof (all as amended) (application reference numbers: 05/02086/FUL and 05/02086/LBC) - Granted and constructed.
- January 2015 - Internal and external alterations including installation of new ATM, ATM surround and associated signage, advertisement signage, doors, lighting, new entrance lobby, new automation, removal of existing counters and replacement with new banking hall layout, as well as proposed painting and new flooring and other associated works (as amended) (application reference number: 14/04727/LBC) - Granted and constructed.
- May 2019 - proposed demolitions, alterations, remodelling and erection of extension to the listed building (application reference number: 18/07730/LBC). This decision was the subject of a judicial review. The parties engaged in a process of mediation and agreement was reached on how to address the matters at dispute. On the basis of this agreement, the Court was invited to reduce the decisions of the council and to return the applications back to the council for further consideration and determination. This remains live and is awaiting determination.
- May 2019 - demolition of boundary wall, modern basement kitchen, rear extension, and outbuilding within existing rear garden; regrading of land, erection of new boundary features and public realm (application reference number: 18/07127/LBC). This decision was the subject of a judicial review. The parties engaged in a process of mediation and agreement was reached on how to address the matters at dispute. On the basis of this agreement, the Court was invited to reduce the decisions of the council and to return the applications back to the council for further consideration and determination. This remains live and is awaiting determination.
- July 2019 - Applications submitted by TH Real Estate for the alterations to rear boundary wall to Elder Street to form vehicular access, use of part existing car park as construction site lay down area and other ancillary works for temporary period (application reference numbers: 18/01052/FUL and 18/01053/LBC) - withdrawn

- September 2019 - minor alterations to existing internal layout of main building. Removal of modern kitchen in single storey rear basement extension to form new music library (application reference number: 19/02941/LBC)
- June 2020- Application for site boundary (rear wall) part demolition to allow site access to Elder Street, as part of future plans for IMPACT Dunard Centre Concert Hall (as amended) (application reference number: 20/01010/LBC)
- June 2020- Application for site boundary (rear wall) part demolition to allow site access to Elder Street, as part of future plans for IMPACT Dunard Centre Concert Hall (as amended) (application reference number: 20/01012/FUL)
- September 2020 - application to amend previous Listed Building Consent by adding 2 no. additional stone piers to wall for structural support (application reference number: 20/03355/LBC)

## Main report

---

### 3.1 Description Of The Proposal

In May 2019, The City of Edinburgh Council granted planning permission and two listed building consents for this application (referred to as Scheme Two). These decisions were then the subject of a judicial review. The parties engaged in a process of mediation and agreement was reached on how to address the matters at dispute. On the basis of this agreement, the Court was invited to reduce the decisions of the Council and to return the applications back to the Council for further consideration and determination. All three applications (application reference numbers: 18/04657/FUL, 18/07730/LBC and 18/07127/LBC) remain live.

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

The application proposes the removal of the 1960s extension located to the rear of Dundas House and the erection of an extension to accommodate a new music and performing arts venue and related infrastructure, access, servicing, and public realm/landscaping works. The retained structures will continue to operate as a bank. An occasional route through the bank to the new music venue will be provided. The application also includes alterations to the rear of number 35 St Andrew Square, including the demolition of the existing boundary wall, associated modern basement kitchen, small outbuilding and extension, to enable the regrading of land for public access. The removal of the wall currently dividing the existing car park from the hammerhead at Elder Street to the east of the site has already been implemented via planning application references 20/03355/LBC, 20/01010/LBC and 20/01012/FUL.

The new music venue is divided into three main volumes: the main concert hall and two lower orthogonal side volumes that house the venue's front and back of house spaces and serves the main hall volume. The oval form of the main concert hall sits on axis with George Street.

The main concert hall has 1,000 seats and can accommodate all types of music, performance, recording and conferences. The spatial implications of its required acoustic parameters dictate the length, width and height of the space which in turn directly informs the primary drum shaped body of the venue. The height of the concert hall volume at the top is 6.26m higher than the ridge of Dundas House and 0.18m lower than the St James Square tenements. The accommodation is split over eight levels, with public access to Levels Basement One to Level Three only. From the top, the accommodation comprises of:

- Level 5 is the roof;
- Level 4 is the technical attic & plant;
- Level 3 is the auditorium, foyer, bar, plant & storage;
- Level 2 is the auditorium, public toilets, general purpose reception rooms, performers changing & storage;
- Level 1 is the auditorium, foyer/ bar/ milling space, green room;
- Level 0 is the entrance foyer, auditorium, back of house entrances;
- Level Basement 1 is the public toilets, performers changing, admin. & back of house accommodation; and
- Level Basement 2 is the kitchen, stores & plant.

The proposed gross floor area of the music venue building is 7,625 sqm (reduced from the previous 11,347sqm) with a height of +92.520m AOD (previously +99.685 m AOD), and +89.97m AOD to the north and south volumes parapet (previously +96.685m AOD to the eaves of the Concert Hall). The new music venue will be 23m to its highest point.

A foyer will provide access to the building from the south-east, providing an area that can accommodate an all-day cafe/bar and range of informal performances. A range of multi-purpose spaces are also provided for educational use, practice and meetings.

The application proposes to use a combination of grit blasted and honed concrete as the primary material. The application proposes new publicly accessible routes throughout the site, connecting St Andrew Square, Register Lanes and the Edinburgh St James development. The primary public route into the building is located towards the south east of the site split across two levels with an entrance on each level. Two additional but occasional public entrances address the western approach including the special access through the Dundas House banking hall. Servicing will be from St Andrews Square into a designated and integrated open loading bay, providing direct access to the stage. This will remain open to allow the pedestrians and cyclists through when not in use.

### Scheme three

A significant number of amendments have been brought forward following the mediation process and during the assessment of the proposals. The main changes relate to:

- the gross internal floor area has reduced from 11.347sqm to 7,625sqm;
- the overall height of the hall volume has reduced from +99.685m AOD to +92.520m AOD at the parapet;
- the height of the north and south volume parapets has reduced from +89.470m AOD to +88.970m AOD;
- the main hall stage has moved down to ground floor level to enable a reduced height;



- the hall has moved 1.54m further away from St James Square tenements;
- the glazed colonnaded crown has been removed;
- the two external public roof terraces have been removed;
- the majority of the venue's is opaque with selected window openings placed away from the adjacent residential buildings;
- changes to the facade design
- reconfiguration and relocation of the main public access points into the building;
- servicing strategy from St Andrew Square;
- Removal of the 200-seater studio space at basement level. To counter the loss of this, the hall has been designed to increase flexibility and optimise the ease of changeover between different uses; and
- redesign of the open sided loading dock.

An EIA Report was submitted to support the application, which scoped in three topic specific assessments: Cultural Heritage, Socio-Economics and Culture, and Townscape and Visual. An addendum to the EIA Report was submitted in February 2019 and August 2021.

### Supporting information

The following documents were submitted in support of the application:

- Contextual Report;
- Design & Access Statement;
- Socio-Economic and Cultural Impact Assessment;
- Planning Statement;
- Pre-application Consultation Report;
- Environmental Impact Assessment Report (including Addendum one and two) and Non-Technical Summary;
- Transport Statement;
- Heritage Statement;
- Flood Risk Assessment;
- Drainage Impact Assessment;
- Daylight and Sunlight Assessment;
- Noise Assessment and
- Bat Survey.

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

## **3.2 Determining Issues**

Due to its proximity to listed buildings and being a site within a conservation area, the proposed development first requires to be assessed against Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the 1997 Heritage Act):

a) In terms of Section 59 there is a strong presumption against granting planning permission for development which would harm a listed building or its setting. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

b) In terms of Section 64 there is a strong presumption against granting planning permission for development which would conflict with the objective of preserving or enhancing the character or appearance of the conservation area. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

Section 25 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act) 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 37 of the 1997 Act states:

- (1) Where an application is made to a planning authority for planning permission -
- (a) subject to sections 27B(2) and 59(1)(b), they may grant planning permission, either unconditionally or subject to such conditions as they think fit, or
  - (b) they may refuse planning permission.
- (2) In dealing with such an application the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations

Section 75 of the 1997 Act enables the Council, subject to having due regard to Circular 3/2012, that prior to the release of planning permission, to require the applicant to enter a planning obligation to:

- a) restrict or regulate development or use of land; and/or
- b) make financial payments.

Section 69 of the Local Government (Scotland) Act 1973 requires financial payment prior to the release of planning permission.

Section 58 of the 1997 Act states that, except where the Council directs otherwise, 3 years from the grant of planning permission it will lapse unless the development has been commenced.

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

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

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

The determining issues to consider in terms of assessing the development against Sections 59 & 64 of the 1997 Heritage Act are:

Would the development:

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

If it would, are there any significant public interest advantages of the development which can only be delivered at the scheme's proposed location that are sufficient to outweigh the strong presumption against granting planning permission?

If the Development complies with Sections 59 & 64 of the 1997 Heritage Act, it then requires to be considered in terms of the 1997 Act and the public sector equalities duty:

Do the proposals comply with the development plan?

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

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

Having due regard to the development plan, guidance and Circular 4/1998 are conditions required to render the proposals acceptable and grant planning permission?

Having due regard to the development plan, guidance and the five policy tests set out in Planning Circular 3/2012 (regarding necessity, planning purpose, relationship to the proposed development, relationship to scale and kind and reasonableness) are Planning Obligations required to render the proposals acceptable and grant planning permission?

Do the nature of the proposals merit a period other than 3 years for the commencement of development?

### **3.3 Assessment**

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

- a) The proposal will preserve the character and appearance of the New Town Conservation Area;
- b) The proposal will have a detrimental impact on the character and setting of any listed buildings;
- c) The proposal will have a detrimental impact on the character of the New Town Gardens and Dean Historic Garden Designed Landscape Inventory Site;
- d) The proposal will preserve the outstanding universal value of the Old and New Towns of Edinburgh World Heritage Site;
- e) The principle of development is acceptable;
- f) The design is acceptable and will contribute towards a sense of place;
- g) The proposal raises any issues in respect of transport and road safety;
- h) The proposal will have a detrimental impact on the amenity of nearby residents;
- i) The proposals are sustainable;
- j) The proposal raises any issues in respect of flooding and drainage;
- k) The proposal raises any issues in respect of archaeology;

- l) The proposal raises any issues in respect of ecology and trees;
- m) The proposal raises any issues in respect of air quality;
- n) There are any other material considerations;
- o) Environmental Impact Assessment Report;
- p) Impacts on equalities and rights are acceptable and
- q) Public representations have been addressed.

**a) The proposal will preserve the character and appearance of the New Town Conservation Area**

Section 64 (1) of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 states: *"special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*

The Courts have clarified that Section 64 means that there is a strong presumption against granting planning permission for development which would conflict with the objective of preserving or enhancing the character or appearance of the conservation area. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

Policy Env 6 in the Edinburgh Local Development Plan (LDP) supports development in a conservation area which preserves or enhances the special character of appearance of the conservation area and is consistent with the relevant character appraisal, preserves trees, hedges, boundary walls, railings, paving and other features which contribute positively to the character of the area and demonstrates high standards of design, utilising materials appropriate to the historic environment.

The site is located within the New Town Conservation Area. The essential characteristics of the Conservation Area, as identified in the New Town Conservation Area Character appraisal include:

- the formal plan layouts, spacious stone built terraces, broad streets and an overall classical elegance.
- views and vistas, including axial views along George Street.
- terminated vistas have been planned within the grid layouts, using churches, monuments, buildings and civic statutory, resulting in an abundance of landmark buildings. These terminated vistas and the long distance views across and out of the Conservation Area are important features.
- the generally uniform height of the New Town ensures that the skyline is distinct and punctuated only by church spires, steeples and monuments.
- grand formal streets lined by fine terraced building expressing neo-classical order, regularity, symmetry, rigid geometry, and a hierarchical arrangement of buildings and spaces.
- within the grid layouts, there are individual set pieces and important buildings that do not disturb the skyline.

- the New Town can also be viewed from above at locations such as the Castle and Calton Hill, which makes the roofscape and skyline sensitive to any modern additions.
- the setting and edges of the New Town and Old Town
- the First New Town is characterised by a general consistency of overall building form, an almost exclusive use of sandstone, natural slate roofs and cast and wrought iron for railings, balconies and street lamps.
- the extensive collection of statues, monuments, historic graveyards and national memorials in the Conservation Area make a significant contribution to the historic and architectural character of the area. They also provide a focus and punctuation points for many views.
- boundaries are important in maintaining the character and quality of the spaces in the New Town. They provide enclosure, define many pedestrian links and restrict views out of the spaces. Stone is the predominant material.
- new development should be of good contemporary design that is sympathetic to the spatial pattern, scale and massing, proportions, building line and design of traditional buildings in the area
- any development within or adjacent to the Conservation Area should restrict itself in scale and mass to the traditionally four/five storey form.

Although the EIA Report has assessed the effects on the Conservation Area as a whole, this assessment has had regard to the essential characteristics of the First New Town. In this regard, the five key aspects that are assessed below are impacts on formal planned alignment of the First New Town, height and skyline, setting and edges, material palette, design quality and landuse. A detailed visual impact assessment in the EIA Report has informed an understanding of the distant and local views that contribute to the character and appearance of the Conservation Area. The Edinburgh St James development to the east of the proposed development has been included in the baseline visualisations.

#### Formal planned alignment of the First New Town

The established spatial hierarchy of the First New Town plan is a key characteristic of the conservation area. The historic plan forms, allied to the dramatic topography, results in important, terminated and long vistas with landmark features.

It is the views along George Street towards St Andrew Square that contribute to the clarity of the urban structure of the planned First New Town and alignment of key buildings.

Although the new building is centrally aligned with this axis and symmetrical with George Street, its prominence behind Dundas House and between the Melville Monument and the new St James Central Hotel, means that it will have an impact on the character and appearance of the conservation area by contributing to the layering within this view experience. The changing pattern of visibility and visual focal points that are experienced as a sequence when moving from west to east along George Street has been considered in the EIA Report. This gives rise to complex changes in how the proposed development is perceived.

From both the western end of George Street at Charlotte Square (Townscape and Visual Impact Assessment (TVIA) Viewpoint 1) and Castle Street (TVIA Viewpoint 2), the Melville Monument dominates the view. This is because, although the proposed development would rise significantly above Dundas House and enclose more open sky space, an open backdrop to the top third of the Melville Monument will still be retained. The EIA Report concludes that the effect on these views would be beneficial. This is agreed and not considered to be significant. It is recognised that there are often intervening elements for example cars and vans in the foreground of these views, particularly TVIA Viewpoint 2. However, these are impermanent features and public consultation has taken place on the redesign of George Street, Hanover Street, Frederick Street and Castle Street that seeks to improve the pedestrian experience and appreciation of heritage along these streets.

One of the most relevant of the Council's Protected Key Views, as identified in the Edinburgh Design Guidance, is viewpoint C11d at the junction of George Street and Frederick Street looking east to St Andrew Square. TVIA Viewpoint 3 corresponds with this view. Here, the key features of the skyline are the spire of St Andrew's and St George's West Church, the open skyspace around the top of the Melville Monument and copper dome of the Royal Society of Edinburgh building. The Edinburgh Skyline Study notes that the 'skyline beyond St Andrew Square is degraded and needs improvement in a way symmetrical with street'. It is acknowledged that the removal of the former St James Centre and its replacement with the new St James Central Hotel clearly contributes to this aspiration. This is further enhanced by the proposed development, with its crown element sitting symmetrical to the axis of George Street, Dundas House and the Melville Monument. The identified features within this viewpoint would be unaffected by the proposal, sitting below the height of the ribbon hotel feature.

From the junction with Hanover Street (TVIA Viewpoint 4), Dundas House becomes more prominent, creating a beneficial and symmetrical effect. In this regard, all five axial views used to assess impact on the character of the First New Town have a beneficial effect on the planned alignment of the New Town.

It is the proposed façade design of the building, including the selection of materials, and softly curved form of the concert hall that has helped to assimilate the new venue into the surrounding townscape and mitigate the apparent changes along the George Street vista. Furthermore, whilst the venue rises above Dundas House in these views, the setback depth within the plot itself helps to alleviate the perception of scale and align it closer to the AOD levels of the larger surrounding development. Height is assessed further under the next heading.

From the closer range view at the junction of St Andrew Square and George Street (TVIA Viewpoint 6), the Melville Monument forms the main focus of the view and obscures most of Dundas House. At St Andrew Square inner path north (TIVA viewpoint 6), the sense of depth, set-back and the building's elliptical form are revealed. Unlike in the views along George Street, the elliptical path within St Andrew Square gardens does not channel views towards the proposal in the same way. Despite being closer to the development, some of the visual effects are also diminished by the presence of larger scale developments, Melville Monument and the arrangement of trees within St Andrew Square. Whilst the loss of sky space around Dundas House from St Andrew Square (CH Viewpoint 6) has a minor adverse impact on the setting of

Dundas House, as set out in the following section 3.3b), in terms of the wider character and visual amenity, there is an opening up of views in this location. This contrasts to the channelled views along George Street.

The overall effect on these views is, therefore, considered to be beneficial. This conclusion is a product of distance and separation from the viewer, with the building being set behind the main buildings fronting St Andrew Square. The profile of the main visual focal points terminating the view remain relatively unchanged in terms of the historic landmark of the Melville Monument and contemporary feature of the St James quarter ribbon hotel. The proposal would be viewed as a new backdrop to Dundas House, screening the lower levels of the St James development and St James Square. The proposal's integration with the baseline would be facilitated by its response to symmetry, simple, elliptical, western façade and colour match to the historic building fabric. In views from the east end of George Street and St Andrew Square, the Gardens assume greater importance as a centrepiece and the proposal recedes behind the more imposing scale of the Dundas House at closer range.

The detailed elements of the new building are most visible in the closer views from Register Place (TVIA Viewpoint 8), Elder Street (TVIA Viewpoint 9) and the Archivists Garden (TVIA Viewpoint 7). From Register Place, the magnitude of change is low and therefore, despite the proximity to the viewpoint, the operational effect would not be adverse.

In respect of the Archivist's Garden, effects would be significant. However, it is considered that the design of the existing office block does not currently make a positive contribution to these spaces and the proposed development does not detract from the enjoyment of the Archivist Garden.

From Elder Street, it is agreed that the effect of the proposal on viewers would be significant due to the very close proximity to the proposed development and its relative scale which would make it a defining feature of this view. Whilst this proposed viewpoint does not reflect the wider contextual views through to the site from the newly created public realm outside the new St James hotel, an additional architectural view has been provided offering a more realistic vantage point from within the new square. This view illustrates the detailing of the façade and reflects the layering that is commonplace across the New Town. Although the strong visual enclosure presented in the TVIA Viewpoint goes against the pedestrian opportunity route set out in the St James Quarter Development Brief, it is the crafted quality of the façade that signals the civic nature of the venue and makes it distinct from the neighbouring buildings. This adds positively to the character and appearance of the New Town Conservation Area.

### Setting and edges

North Bridge and the Mound are the original links between the Old and New Towns. The building is not visible from the eastern footpath of North Bridge (TVIA Viewpoint 19). The effect of the proposed development would, therefore, not alter this planned vista along North Bridge. There would also be no visibility of the proposed development from TVIA Viewpoint 20 at Market Street/Mound Place. In views from the Castle ramparts (TVIA Viewpoint 10), despite its scale and central location, the proposed development would be concealed behind the new development on the southern side of St Andrew Square.

While it may be possible that from different locations in the castle compound, the proposed development might be visible, this is unlikely and the extent to which it might be visible would be very limited. The EIA Report assesses a negligible impact from the Castle ramparts. This is agreed.

### Height, skyline and views

The Conservation Area Character Appraisal identifies the importance of a cohesive, historic skyline and its contribution to the character of the conservation area. It also highlights the need to avoid incremental skyline erosion through increased building heights.

This is supported by LDP Policy Des 11 which only permits development which rises above the prevailing building height where a landmark is to be created that enhances the skyline and surrounding townscape, the scale of the building is appropriate to its context, and there would be no adverse impact on important views of landmark buildings, the historic skyline, landscape features in the urban area or the landscape setting of the city, including the Firth of Forth. Likewise, LDP Policy Des 4 supports development where it is demonstrated that it will have a positive impact on its surroundings, including the character of the wider townscape and landscape, and impact on existing views, having regard to height and form, scale and proportions, including the spaces between buildings and position of buildings and other features on the site and materials and detailing. Height is assessed within the context of the conservation area.

The height of buildings prevailing in the surrounding area is of a characteristic general height of between 94 and 95m AOD, as defined in the Edinburgh Skyline Report. The height of the new building is 92.510m, which sits below this general height. The building has been designed with a slightly lower symmetrical massing either side of a central oval volume. In this regard, the main body of the building sits at a maximum AOD range of between 89.97m and 92.510m. The design has mitigated its maximum height by locating the plant, kitchen and stores below ground level.

In this regard, the new building sits comfortably alongside the datum and height of the surrounding buildings, with Harvey Nichols at 93.870m AOD, St James Square tenement building at 92.7m AOD, New Register House at 88.415m AOD and The Edinburgh Grand (42 St Andrew Square) at 101.950m AOD. Rising above all these heights is the Edinburgh St James Central Hotel at 122.790m AOD to ridge, which is still visible in the skyline and within a number of the tested key views. The oval form of the central part of the new building relates to and reflects the cluster of domed volumes of significant cultural and civic buildings within and to the south east of the site associated with the developments around Register Place. In this regard, within this wider townscape, the new building sits comfortably, representing an effective use of the site.

In a number of viewpoints, due to the relative height of the proposal, its visibility is contained in wider city views by the scale of surrounding urban blocks within the Old and New Town, including recent developments of Edinburgh St James.



From the Edinburgh Castle Ramparts (TVIA Viewpoint 10 and Protected View C1a/b), despite its scale and central location, the proposed development would be concealed behind the new development on the southern side of St Andrew Square. From Calton Hill (VP 11) the proposal would be completely screened by the intervening St James quarter development.

Salisbury Crags (TVIA Viewpoint 12) is the only elevated city viewpoint assessed revealing greater visibility of the proposal. The proposal would be seen to the west of the St James quarter partially against the upper levels of the Harvey Nichols building. This has a neutral effect, owing to the distance from the viewpoint (1.3 km), its flat roofline, and relative height and colour match to its surrounding context.

It is concluded that the overall height and form of the new building will create a subtle, but positive addition to the skyline, appropriate for a civic building.

There is some information available to assess the impact of the proposal on locations where night-time views of the city centre would be experienced, in particular from the axis of George Street and St Andrew Square. The proposal forms part of a layered backdrop to these views between Dundas House and the St James quarter. A subtle wash of light is proposed for the crown of the drum in order for it to form a sensitive backdrop behind the lit façade of Dundas House with fittings discreetly integrated within the architectural detailing. Each of the three entrances will have lit canopies and integrated illuminated signage. A condition is recommended to secure a more detailed lighting design proposal. Given the lack of feature lighting in St Andrew Square, including the Melville Monument and subtle lighting of Dundas House, any external lighting to the concert hall will need to be carefully considered.

### Material palette

The application proposes to use grit blasted and honed concrete as the primary material, a technique which captures the tones of the surrounding stonework, without imitating or replicating it. The concrete will be made from selected stone aggregates of varying scales, exposed through a refined honing process. Based on an analysis of the origins and colour of surrounding stonework within St Andrew Square, it will effectively blend into the richness of the conservation area. The material palette, along with the quiet composition will complement the A listed Dundas House.

Whilst it is acknowledged that sandstone is the characteristic building material of the conservation area, the mineral quality, texture and tone of the honed concrete will reflect the surface layering, articulation and variation in colour and tones of the surrounding stone buildings. This high-quality material selection is an appropriate contemporary response to blend in with the richness of the sandstone of its immediate neighbours and the prevailing material within the New Town. The quality, porosity and detailing of the panels will enable the building to absorb and shed water evenly. The applicant has engaged in an extensive sampling process to ensure material quality, composition, finish and detailed design, leading to the installation of an on-site sample panel, which has been taken into consideration in the determination process.

Likewise, the design of the public realm will preserve and enhance the setting of the conservation area. The forecourt and external spaces around the venue are proposed to be resurfaced with Scottish Whinstone, replacing the asphalt to circulation and car parking spaces, with a high-quality and robust surface appropriate to its setting. Permeability will be created through the site, contributing to the planned hierarchy of streets, spaces and gardens associated with the New Town.

### Design quality

The New Town Conservation Area Character Appraisal states that new buildings should be a stimulus to imaginative, high-quality design and seen as an opportunity to enhance the area. Direct imitation of earlier styles is not encouraged, but rather new buildings should be designed with respect for their context. In this regard, the Council supports contemporary designs that are sympathetic and complimentary to the spatial pattern, scale and massing, proportions, building line and design of traditional buildings in the area.

The proposed façade details, proportions and materials of the new building respond to the classical order, proportions and materials of the New Town. The simplicity and solidity ameliorate its impact on many of the views, whilst its symmetrical arrangement and oval form respond to the formality of the New Town composition. From views along George Street, the new building adds positively to the axial composition of the view down George Street and mediates between the scales of Dundas House and St James hotel. In this regard, its form is a logical and positive response. More detailed aspects of the design are assessed in section 3f).

### Land use

The proposed development will provide a new cultural venue in the heart of the city, which would add a new civic building within a predominantly commercial area, thus supporting the importance of the First New Town as the heart of the capital. The northern fringe of the Conservation Area is included in the Old and New Towns of Edinburgh World Heritage Site. As set out in section 3.3d) and 3.3n), the proposed development is closely aligned with the cultural attributes of the Outstanding Universal Value of the World Heritage Site. In this regard, the proposed use would make a positive contribution to the cultural, social and educational provision in the New Town and is aligned with the existing character.

### Conclusion

Whilst the proposal does not impact adversely and significantly on city-wide views and townscape character, the mass and scale of the new building will affect the spatial characteristics of the planned First New Town. The proposal seeks to form a new planned alignment. The result is a layering of separate elements, and the extent to which these elements are visible varies as part of the sequence of views along George Street.

However, it is the simplicity of the architectural form and materials corresponding to the classical proportions and rhythm of the immediate context that would appear as a new simple backdrop to Dundas House.

This contributes to the visual alignment on axis with George Street by providing a more cohesive backdrop to Dundas House that achieves an effective terminating effect to a significant planned vista.

Therefore, on balance, and taking its proposed use into consideration, it is considered that the proposed development does not remove or detract from key characteristic components of the conservation area that gives the area its special interest. It will contribute to the architectural quality of the area with a contemporary high-quality building designed to respond to its historic and modern urban environment. The proposal's symmetry to the axis of George Street and elliptical form of the hall assists in mediating between the scale of the neo-classical Dundas House and the contemporary Edinburgh St James development. In this regard, the special character and appearance of the New Town Conservation Area will be preserved and enhanced, complying with Section 64 (1) of the Planning (Listed Building and Conservation Areas) (Scotland) Act 1997 and LDP Policy Env 6.

## **b) Impact on the character and setting of any listed buildings**

A detailed assessment of the proposed alterations to the listed buildings on site is provided in the two separate listed building consent applications for the site (application reference numbers: 18/07730/LBC and 18/07127/LBC).

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."*

The Courts have clarified that Section 59(1) means that there is a strong presumption against granting planning permission for development which would harm a listed building or its setting. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

In this case, there are a number of listed buildings which require to be considered in assessing the proposed development. This assessment has to be made within the parameters of having special regard to the desirability of preserving the character of these buildings or their settings, or any features of special architectural or historic interest which they possess.

LDP Policy Env 3 supports development within the curtilage or affecting the setting of a listed building if not detrimental to the architectural character, appearance or historic interest of the building or to its setting. LDP Policy Env 4 permits alterations or extensions to a listed building where those alterations or extensions are justified, there will be no necessary damage to historic structures or diminution of its interest; and where any additions are in keeping with other parts of the building.

Historic Environment Scotland's document 'Managing change in the Historic Environment - Setting' states that 'setting' is the way the surroundings of an historic

asset or place contribute to how it is understood, appreciated and experienced. The document states that where development is proposed it is important to:

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

In order to address the Act, the assessment is divided into the individual (or relevant groups) of listed buildings. There are two main aspects to the consideration of the impact on listed buildings which are assessed in turn:

- Impact on the character and setting of Dundas House and
- Impact on the setting of other neighbouring listed buildings.

### Impact on the character of category A listed Dundas House

Dundas House is highly important as one of the first and grandest villas of the New Town, designed by a nationally important architect, Sir William Chambers. It comprises a freestanding symmetrical villa, in set-back position on St Andrew Square in an axial position to George Street, behind a front forecourt and oval carriage drive, giving the impression of a country mansion. It originally had extensive rear garden grounds, an open skyline, and wider landscape setting behind, although this was disturbed by the building of St James Square shortly afterwards.

Dundas House was built contrary to James Craig's planned First New Town, which intended a landmark church (St Andrew's Church) to terminate the eastern axial view along George Street, corresponding to an equivalent landmark church (St George's Church) at Charlotte Square, on the western axial view. Nevertheless, Dundas House is established as an outstanding neo-classical centrepiece, which together with the two framing front pavilions at 35 and 37 St Andrew Square (the latter designed to be symmetrical with the earlier number 35), remains one of the few surviving original architectural compositions on the square.

The proposed demolition works primarily involve the 1960s office block by Glasgow architects, Gratton & McLean. The maximum AOD level of the office block is 89.04m to the plant room/lift overrun and 85.03m AOD to the principal parapet height. Given the later additional of the 1960s office block, its use of materials, height and positioning on the site it is not considered that the office contributes to the special character of Dundas House and the removal of this element is acceptable. The new music venue will connect with the rear facade of the banking hall, itself a mid-19th century extension to the original villa. In this regard, the original Dundas House villa has been extended several times throughout its history. However, in contrast to the relatively concealed 1960s block it would replace, the new structure would rise above the listed building, and expand beyond it to the rear and to the north.

Dundas House is relatively modest in size at 87.260m AOD to ridge height. The proposed extension would sit 5.26m above the ridge height of Dundas House and double its floor plan. The Heritage Statement acknowledges that the building is "the minimum possible whilst still enabling the provision of an auditorium that meets the acoustic and performance requirements of the brief".

Historic Environment Scotland's Managing Change guidance note on 'Extensions' states that extensions should ordinarily be subordinate in both scale and form. The proposed extension does not fully comply with the HES Managing Change guidance on extensions by virtue of its scale. This is because the concert hall needs to be a certain height to deliver the acoustic and performance requirements of the applicant's brief. Nevertheless, in many of the Cultural Heritage viewpoints contained in the EIA Report, the building reads as a new building and not an extension. For this reason, and given the reduced height and high quality design, the integrity and character of Dundas House will not be compromised.

Careful consideration has been given in the design to the relationship and interface of the new building with Dundas House. The physical junction between the new structure and the old has been minimised, exposing the majority of the historic facade at ground floor level. The 155sqm of the blank portion of the existing building to the rear of the banking hall abuts to the new building by a solid non-structural connection. The new building steps back from the east facade of the south wing of Dundas House by approximately 0.75m, expressed through a series of metal panels set back from the concrete façade line. This provides a private access route between the south wing of Dundas House and the proposed venue to facilitate external maintenance of Dundas House, the Dunard Centre and the adjoining courtyard only. This separation also allows the historic cornice and corbel details of the wing to remain undisturbed.

Internally, the historic rear façade has also been partially exposed within the ground floor foyer. A single new opening is proposed to link the foyer with Dundas House. A small lightwell courtyard has also been formed to the southwest corner in order to permit light into adjacent Dundas House accommodation. This will not be publicly accessible for security purposes.

The proposed design seeks to mitigate potential negative impact on its character by responding to the classical order of the New Town, with the proportions and materials representing a contemporary, high-quality architectural response. The central oval volume containing the concert hall reflects many of the significant cultural and civic buildings within and to the south east of the site. Furthermore, due to the depth of Dundas House and the fact that the building has a forecourt and is set back from the street edge by approximately 32m, the impacts are reduced in closer views. The design, therefore, preserves the architectural integrity of Dundas House and the detailing of the interface will ensure all works to the historic building are reversible.

### Conclusion - character of Dundas House

It can be concluded that the direct physical interventions would not unduly diminish historic structures and architectural character of Dundas House. Impact on its setting is assessed further in the section below.

### Impact on the setting of Dundas House

Historic Environment Scotland's document 'Managing change in the Historic Environment - Setting' states that "'Setting' is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced".

The existing setting of Dundas House is much changed from when it was originally constructed. One of the first buildings in the First New Town, it was set against the backdrop of a significant garden area and placed in a set-back position on the square. The twinned flanking pavilion townhouses to the north and south were built shortly after the main listed building, clearly defining the relationship to St Andrew Square and providing a set-piece on the principal George Street axis. This arrangement provides a unified, distinct, architectural composition that is clearly legible on both site and plan. In this regard, Dundas House makes an important contribution to the formal grid plan of the First New Town and this arrangement remains legible today.

This set-piece can be appreciated in a range of axial views to and from Dundas House from St Andrew Square, including Cultural Heritage (CH) Viewpoints 3, 5 and 6, where the symmetry of Dundas House and its pavilions on the axis can be observed. It is acknowledged, however, that views of St Andrew Square along George Street have never been static. There are a number of taller structures both beside and behind the building. These include 19th and 20th century buildings, including Harvey Nichols, the demolished St James Centre and its replacement which are complete. The A listed tenement on St James Square can also be seen behind Dundas House in more distant views of the site. The early 19th century A listed Melville Monument also sits directly in front of Dundas House as a key landmark in the east axial view. For these reasons, besides its three-storey scale, Dundas House is generally not prominent in views along George Street.

Dundas House now forms part of a dense urban context. The present surroundings and baseline for the assessment of impact on setting is the Edinburgh St James Development. Taking the above context into consideration, the key aspects of setting that have been assessed in this section are impacts on longer views, the understanding of the flanking pavilion townhouses and the spatial relationship with Dundas House. The assessment has been informed by the series of verified views included in the Cultural Heritage section of the EIA Report.

#### *Impact on longer views*

The changing pattern of visibility and visual focal points that are experienced as a sequence when moving from west to east along George Street have been well considered. This gives rise to complex changes in how the proposal is perceived.

In the longer views down George Street from the junctions with Hanover Street (CH Viewpoint 9) and Frederick Street (CH Viewpoint 10), the new building would be seen as an additional layer in a wider context of higher buildings which form the backdrop to Dundas House, notably the new Edinburgh St James development and the rear of the tenement buildings on St James Square. All these buildings create a setting that, when viewed from a distance, results in a lack of clarity to Dundas House. This results in it becoming lost within the dense urban environment. In this regard, the addition of the proposed building would not significantly alter this element of Dundas House's setting.

The design of the scheme has sought to create a simpler, more cohesive, backdrop to Dundas House, against which its profile can still be read. The choice of materials in the scheme has sought to complement the traditional stonework and roofing of Dundas House and other buildings in the New Town.

The classical architectural language and use of one contrasting material to the rear creates a symmetrical canvas against which Dundas House once more becomes a clear feature appearing to project forward in these views.

Undoubtedly, the new building will have a significant impact on the setting of Dundas House when considered in isolation. However, against the baseline of the Edinburgh St James development and existing buildings, the proposed concert hall is beneficial to the understanding, appreciation and experience of Dundas House, in these longer views along George Street. In this regard, given the reduced height in scheme three, the setting of Dundas House would be integrated with the townscape in longer views, against the backdrop of St James Square and hotel development.

#### *Impact on the pavilion townhouses*

Of great importance to the setting of Dundas House is its relationship with the two A listed flanking pavilion townhouses (number 35 and 37 St Andrew Square). Although the new building would not appear above Dundas House in CH Viewpoints 1-3, it does appear in the visual envelope to the sides and edges of Dundas House. Nevertheless, the symmetrical balance of the Dunard Centre, its set back to the rear of the plot behind Dundas House and the responsive design to its Neo-Classical form and design of its neighbours would result in a visual change within the setting that would respond to and respect the building hierarchy of the group. In this regard, the new building does not affect the spatial arrangement of the building group. This has a beneficial effect, as concluded in the EIA Report.

However, from the inner path south (CH Viewpoint 6), the relationship between these buildings is affected by the new building. It is from this existing view that the roof profile of Dundas House can be seen more clearly against the skyline, rather than against the backdrop of higher buildings. The new building increases the solid mass, filling in some of this sky space, which currently creates a strong relationship between the three buildings and affords Dundas House a degree of prominence. The skyline behind Dundas House and some of the surviving qualities of the building, as a set-piece within a landscape, will be altered. However, the reduced height of the crown and plan depth of the banking hall, lessens this impact.

Historic Environment Scotland (HES) does not object to this application or the corresponding listed building application. They are content that there is a lesser impact on closer views of the development from St Andrew Square. They state that the development will still be visible above the roofscape of Dundas House, unfortunately losing the building's current silhouette against the skyline in a series of viewpoints. However, this adverse impact is much reduced from the previous proposals and represent the changing urban townscape of the city, reading as interventions to an already compromised backdrop.

### *Impact on the spatial relationship with Dundas House*

The existing immediate setting within the perimeter of the site is detrimental to the significance of the building and its overall architectural character and appearance. The former rear garden area has been gradually eroded through the 19th and early 20th centuries with subsequent bank developments until it was comprehensively redeveloped in the 1960s with the construction of the office block, lower ground parking, surface and decked car park and access ramps. In this regard, the original setting of Dundas House has already significantly changed. The proposed development and the new public realm will improve the experience of the main building and consequently improve its immediate setting. The forecourt and external spaces around the venue are proposed to be resurfaced with Scottish Whinstone, replacing the asphalt to circulation and car parking spaces, with a high-quality and robust surface appropriate to its setting. The impacts of the new public realm on Dundas House are acceptable. Furthermore, due to a plan depth of about 24m of the existing banking hall, the new building will be separated from the original villa, reducing the impact on the principal elevation and forecourt to Dundas House.

### Conclusion - Setting of Dundas House

The relationship of the new building with the setting of Dundas House is complex and will change depending on the point of reference and experience of the view. In views from the eastern and southern sides of St Andrew Square where the development will have a greater impact on its setting, the elevational design and form, including the set-back and oval form, mitigates some of these.

The EIA Report states that the overall significance of the effect on Dundas House is negligible/minor beneficial. Whilst it is agreed that the impact on more distant views along George Street is beneficial, there is still a minor adverse impact on the setting of Dundas House from the south side of St Andrew Square. Overall, however, it is concluded that the impact is neutral and that the setting of Dundas House is preserved.

### Impact on adjacent listed buildings

#### *Melville Monument*

The 45m high A listed Melville Monument dominates the long axial views along George Street from the west and is visible more widely in the city. The Melville Monument is set within the centre of a large enclosed open space, meaning that its dominance within the centre of St Andrew Square and on axial views along George Street will be preserved with the proposed development. The new building will sit on axis with the monument and the St James Central Hotel behind. This axial composition contributes positively to the complex layering of this view. The Melville Monument will continue to dominate and be at the forefront of these views. The EIA report concludes that the magnitude of the impact of the proposed development is negligible. This is agreed.

#### *Monument to John, 4th Earl of Hopetoun*

The A listed Hopetoun Monument is an equestrian statue located in the lawn forecourt of Dundas House. The public realm works for the new venue will retain the statue in the oval lawn in its current position.



Improvements to the surrounding surfaces and the introduction of a high-quality public realm throughout the site will enhance the setting of the listed monument. The overall significance of the effect of the proposed development on the setting of the Hopetoun Monument is positive. The magnitude of the impact of the proposed development is negligible.

#### *The pavilion buildings - 35 and 37 St Andrew Square*

As stated previously, number 35 and 37 are two A listed flanking pavilion townhouses at the entrance to the Dundas House forecourt. Together they create a group composition with Dundas House as they frame its forecourt. The relatively low scale of the buildings, against the larger scale and more-dominant surrounding development, including trees and planting on St Andrew Square mean that they are neither prominent nor visible in longer or medium distance views. The setting of 35 St Andrew Square in the baseline condition is compromised by trees and the coffee pavilion in the foreground that obscure views to the principal elevation. The proposed development will not affect key views or the framing effect to the open court to Dundas House that the townhouse pavilion provides. In views from the north side of St Andrew Square the roof form of the proposed development is limited to the side of the roof profile of number 35, but this does not affect the ability to understand the asset.

Although the principal elevation of number 37 matches that of number 35, the flanking elevation to the north flanking Dundas House forecourt did not follow the same detail and is without the pilasters between the bays. However, this property is currently being extended which strengthens the enclosing effect around the court of Dundas House. The proposed development does not alter the character or appearance of the principal elevation or built form of number 37, nor the group composition of the building as it frames the entrance to Dundas House with number 35.

The proposed removal of the historic boundary wall of number 35 would alter the layout of the plot of Dundas House, affecting its symmetry to some degree. However, this impact has been effectively mitigated by demarcating this historic curtilage through alterations in surface treatment. The public realm design, therefore, preserves the character and setting of number 35. Historic Environment Scotland is supportive of this change.

The EIA report concludes that the overall significance of the effect of the proposed development on 35 and 37 St Andrew Square is negligible. This is agreed. Overall, the impact on these listed buildings is, therefore, acceptable.

#### *38-39 St Andrew Square*

The proposed new building sits comfortably to the north of this A listed building and is comfortably set back and lower. The overall significance of the effect of the proposed development on the setting of 38-29 St Andrew Square is negligible.

### *42 St Andrew Square*

This A listed building dominates views from the west along the south side of St Andrew Square as well as Dundas House and buildings on its immediate north side. The proposed development will not alter the dominance of this building nor its architectural character or presence at this part of St. Andrew Square. The overall significance of the effect of the proposed development on the setting of 42 St Andrew Square is neutral.

### *23-26 St James Square*

The four-storey A listed tenement property at 23-26 St James Square is one of an isolated pair of tenements that had stood at the northwest corner of St James Square and survived the demolitions to create the St James Centre in the 1960s. A small garden court is located in front. The setting of this block has been severely compromised by the loss of St James Square in the 1960s and substantial large-scale developments to the north and east associated with Multrees Walk and the Central Bus Station.

The outer-most face of the new building facade is 4.5m from the nearest corner of the A listed tenement. This has increased from 2.96m in scheme two. Despite its proximity to the proposed development it does not have an associative relationship with the former garden plot of Dundas House or notably overlook the Dundas House plot. Furthermore, the spatial relationship between Dundas House and the tenement has been substantially altered by the later banking hall addition and the 1960s office block. In this regard the proposed development will not substantially change that spatial relationship. Whilst Edinburgh World Heritage considered there to be an adverse impact on the setting of 23-26 St James Square, the EIA Report concludes that the overall significance of the effect of the proposed development on the setting of 23-26 St James Square is negligible. This is agreed.

### *General Register House*

The back dome to the A listed General Register House sits within a public garden, the Archivist's Garden, connecting New Register House, General Register House and Sasine Office. The back dome is in the centre of the garden which extends up to the outer edge of the boundary wall of the former garden plot of Dundas House. Whilst the proposed concert hall is a more substantial building than the existing 1960s office block, the choice of materials and façade details complement the context. It does not compromise the grouping of the records office buildings as experienced at the rear and side of these buildings centred on the back dome and the Archivists Garden. Nor does it compromise the relationship of the back dome to the General Register House to which it is attached. The overall significance of the effect of the proposed development on the setting of the General Register House, circular record hall is negligible.

### *New Register House, Princes Street*

The rear of this A listed building faces the southern elevation of Dundas House and is plain in style. Whilst the proposed extension will be noticeably close to New Register House and the garden court from the view along Register Place, the new building does not appear as a solid masonry elevation.

The façade detail, the vertical colonnade with slender columns and cornice line, complement the classical geometry of the existing building. The EIA Report concludes that the overall significance of the effect of the proposed development on the setting of New Register House is negligible.

*James Craig Walk, Scottish office (formerly 27-31 St James Square), and, James Craig Walk, Princes Street, General Register House, Sasine office*

These properties form a grouping within the street context and are connected so have been assessed together. The proposed development will not affect the setting of the Sasine Office to General Register House. The rear of these properties overlook the Archivist's Garden and are oriented towards General Register House. Whilst the south west gable of the former 27-31 St James Square now overlooks the former garden plot rising above the rubble boundary wall, this elevation is heavily altered from the original, former side elevation to the block and is not a significant part of the character of the listed building. The proposed development will be set a distance away within the former garden plot. Furthermore, the materials choice and vertical proportion of the south orthogonal block will complement those of the surrounding buildings to the rear. The EIA Report concludes that the overall significance of the effect of the proposed development on the setting of James Craig Walk, Scottish Office is neutral/negligible (beneficial) and the setting of General Register House, Sasine Office is neutral. These are agreed.

#### Conclusion - setting of adjacent listed buildings

The proposals would not have an adverse impact on the neighbouring listed buildings. Most of these A listed buildings have a classical composition and elevational treatment. The architecture and form of the proposed development reflects the classical forms, composition and architecture of the surrounding buildings. Furthermore, the axial arrangement in views along George Street and the symmetrical plan and elevational composition of the concert hall volume contribute to the setting of neighbouring listed buildings.

#### Conclusion in respect of Section 59 and 64 the Planning (Listed Building and Conservation Areas)(Scotland) Act 1997

Due to its proximity to listed buildings and being a site within a conservation area, the proposed development first required to be assessed against Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the '1997 Heritage Act'). The Courts have clarified that Section 59 and 64 mean that there is a strong presumption against granting planning permission for development which would either: (i) harm a listed building or its setting; or (ii) conflict with the objective of preserving or enhancing the character or appearance of the conservation area. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

On balance it is not considered that the proposals conflict with the objective of preserving or enhancing the character or appearance of the conservation area (assessed in 3.3a)). Nor is it considered that any of the adjacent listed building or their settings are harmed by the proposals (assessed in 3.3b)).

Although the proposal would harm the setting of Dundas House from the southern inner path, the overall effect on the setting of Dundas House is neutral. In this regard, the presumption against granting planning permission would not be engaged and the application complies with Sections 59 and 64 of the Planning (Listed Building and Conservation Areas)(Scotland) Act 1997.

In the event that the Development Management Sub-Committee conclude that the negative presumption is engaged, it will be necessary to consider whether the presumption can be rebutted due to the proposals resulting in significant public interest advantages which can only be delivered at the scheme's proposed location. It is considered that the proposals do result in significant public interest advantages which can only be delivered at the scheme's proposed location.

The scheme at its proposed location would result in significant economic, social and cultural benefits to the city and the wider community. Historic Environment Scotland policies HEP1, HEP2, HEP5 and HEP6, state that decisions affecting the historic environment should be informed by an inclusive understanding of the potential consequences for people and communities to ensure that changes to a site or place are proportionate to its cultural significance.

The proposal would form an important strategic development in the city's cultural infrastructure and create a vital stimulus for live music, musicians and audiences. As well as strengthening Edinburgh as a 'Festival City', the venue would become a focal point for engagement, learning and outreach. These arise because of the development's location, being adjacent to IMPACT Scotland's offices at 35 St Andrew Square, where the National Youth Choir of Scotland will also be located. This allows the establishment of a regional training choir and singing programme for communities across Edinburgh.

In order to be successful, both functionally and commercially, a large Edinburgh city centre site is essential. The site is adjacent to bars/restaurants and other cultural venues. The site also benefits from excellent active travel and public transport links, with Waverley train station 400m walking distance, Edinburgh bus station 170m away and the tram stop 100m away on St Andrew Square. It is also close to public parking. Six alternative city centre sites were considered. None of these were suitable, available or deliverable.

The significant social, cultural and economic benefits of siting the development in this proposed location, as discussed in section 3.3n), are a considerable material consideration.

**c) The proposal will have a detrimental impact on the character of the New Town Gardens and Dean Historic Garden Designed Landscape Inventory Site;**

LDP Policy Env 7 aims to protect the setting or component features of the Inventory of Gardens and Designed Landscapes. The site is located within the New Town Gardens and Dean Inventory designated Garden and Designed Landscape (GDL). St Andrew Square is the closest New Town garden and the one most likely to be affected by the proposed development. The original 'pleasure garden' was laid out in 1772, with the design centering around the landmark feature of the 45m high Melville Monument.

In 2008, the gardens were redesigned to create a publicly accessible and modern space. Calton Hill is another important part of the GDL. Views from Calton Hill have been assessed in section 3.3b) and considered to not impact on the character and views from this part of the GDL.

A key attribute of the GDL is the relationship between the open spaces and the enclosing buildings. In respect of St Andrew Square, the buildings are of varying architectural styles. The proposed development continues this pattern of changing urban form and associated uses. Although there will be localised visual impacts from St Andrew Square as considered in sections 3.3a) and 3.3b), and a higher footfall as a result of the expanded network of public realm and new cultural activity, it is not considered that the proposed development will impact on the balance of characteristics that contribute to the GDL status. In this regard, the proposed development complies with LDP Policy Env 7.

**d) The proposal will preserve the outstanding universal value of the Old and New Towns of Edinburgh World Heritage Site**

LDP Policy Env 1 states that development will not be permitted which would have a harmful impact on the qualities which justified the inscription of the Old and New Towns of Edinburgh World Heritage Site, or would have a detrimental impact on the Site's setting.

The Old and New Towns of Edinburgh World Heritage Site (WHS) was inscribed on the World Heritage List by UNESCO World Heritage Committee in 1995. It was accepted at the point of inscription that the 1995 baseline was, in this particular area, going to change as a result of potential change to the St James Centre. These changes are ongoing with the construction of its replacement. In this regard, it is the view of the Edinburgh World Heritage Trust that this sets a new baseline from which to manage the Outstanding Universal Value (OUV) in this area. Likewise, there have been other significant changes in the area since 1995, including the construction of the bus station, Harvey Nichols, the Standard Life building on the south of the square, the Registers development, the addition of the tram infrastructure and the re-imagining of the square itself. The WHS Management Plan, by its very nature, accepts that inevitably change will occur within the WHS. An EIA Report has been submitted with the application to assess the effects of this change.

Chapter 4 of the 2011-2016 Management Plan sets out an interpretation of the key attributes of the OUV which are further explained in Appendix D.3 of the 2017-2022 Management Plan. These are grouped under headings assessed in the section below. The proposed development has the potential to impact on some of these attributes. The attributes that may be affected include both physical built environment considerations and more intangible attributes relating to the cultural life of the city. The EIA Report considers the impacts of the proposed development on these attributes. Given the numerous and overlapping factors that contribute to the OUV of the WHS, the assessment has also been informed by other sections of the report, notably impacts on the New Town Conservation Area in section 3.3a), character and setting of listed buildings in section 3.3b), and the wider social, cultural and economic impacts in section 3.3n).

## The remarkable juxtaposition of the Old and New Towns

As considered in section 3.3a), the proposed development would not be visible across the majority of the WHS, with actual visibility being greatly reduced by the enclosure of built form and mature tree cover. The proposed development would, therefore, be well recessed from the transition between the Old and New Towns. There is no visibility from the Castle Ramparts (TVIA Viewpoint 10). In this regard, the proposed development would have little influence on this attribute.

### Old Town

From elevated parts of the Old Town, for example the Castle Ramparts (TVIA Viewpoint 10 and Protected View C1a/b), the proposal will be concealed by new development on the south side of St Andrew Square. In this regard, the proposed development would have no influence on this attribute.

### New Town

The built form and composition of the proposed development will bring about a notable change within the New Town, its prominence accentuated by its position at the end of the axial vista along George Street, as considered in section 3.3a). While its scale would be larger than that of Dundas House, the proposed development will contribute to the axial arrangement and symmetry of the New Town, providing a terminating effect to the axial view along George Street. In this regard, it will add positively to the town planning components, giving clarity to the urban structure of the New Town that contribute to the integrity of the WHS. This is supported by Edinburgh World Heritage Trust, who consider there to be a neutral impact on the layout of the New Town and a positive impact on the clarity of urban structure.

### Architectural Quality

The design quality is considered in section 3.3a) and 3.3f). While the proposed development is a modern intervention in the Georgian New Town, the façade details, proportions and materials of the building have been selected to respond to the classical order, proportions and materials of the New Town. This produces a contemporary high-quality building that responds to the New Town character.

### Topography, planned alignments and skyline

The dramatic topography of the Old Town combined with planned alignments of key buildings in both the Old and New Town, result in spectacular views and an iconic skyline. The impact on topography and skyline is assessed in section 3.3a).

The planned view along George Street towards Dundas House also contributes to the clarity of the urban structure of the New Town and alignment of key buildings, as set out in Section 3.3b). Dundas House is aligned on the key axis of the New Town, but generally not prominent in views along George Street. Whilst Edinburgh World Heritage Trust consider there to be a neutral impact on the planned alignments of key buildings, they conclude there would be a negative impact on the classical set piece around Dundas House and Dundas House itself as the finest free-standing house in the New Town.

Although the garden space has already been altered, the proposals would make this clearly evident in a way in which it has not previously been appreciated. This is reflected in section 3.3b) where it is considered that there would be a minor adverse impact on the alignments of these key buildings from the south of St Andrew Square (CH Viewpoint 6).

Furthermore, key elements of this architectural set-piece would not be affected; the layout of Dundas House on its plot, its front forecourt and flanking pavilions. CH Viewpoint 1 demonstrates that there would also be little impact when viewed from the pavement directly in front of the building, with Dundas House remaining readable as a free-standing house, set back from the urban square. Therefore, on balance, the central relationship Dundas House has with St Andrew Square and associated planned alignment would be sufficiently preserved.

### Influence of urban planning

The First New Town is characterised by its formal urban plan. The proposed development reflects the pattern by terminating the axial view along George Street and contributing to the symmetry of this planned alignment. Therefore, as assessed in section 3.3a), the new building will strengthen the sense of a planned layout.

### Culture and activities

In addition to the physical attributes of the OUV, the proposed development relates directly to the OUV of 'Culture and Activities'. The city has a predominant position within the Scottish arts scene, across a full spectrum of activities, and plays host each year to the highly regarded and world-renowned Edinburgh International Festival. The Management Plan states that sustaining a living capital city centre is a balance between protecting the environment, strengthening society and supporting a vibrant cultural scene. The magnitude of change as a result of the proposed development would be high, as the development would provide a new cultural and civic venue in the heart of the city, adding to the character of the city and supporting its vibrant cultural scene. The assessment and consideration of the cultural benefits is set out in section 3.3n). The proposed development has the potential to have a positive impact on this attribute. This is supported by the consultation responses from Historic Environment Scotland and Edinburgh World Heritage Trust.

### Conclusion

The effect of the proposed development on the WHS is complex, reflecting both adverse and beneficial impacts on different attributes of the OUV. The four attributes with potential to be affected include those associated with the New Town, its Architectural Quality, its Topography, Planned Alignments and Skyline, and its Culture and Activities. There would be a localised adverse effect due to the changes the new building would introduce to the perception of the attributes from within St Andrew Square to the south. Nevertheless, there is potential for beneficial effects on the cultural life of the city, an important attribute of the OUV of the WHS. In this regard, it is considered that overall the effect of the proposed development on the OUV of the WHS as a whole would be beneficial. Historic Environment Scotland consider that the conclusions of the EIA Report have been reasonably supported by the information provided.

In this regard, the application complies with LDP Policy Env 1.

**e) The principle of development is acceptable**

The aims and strategy of the LDP include supporting the growth of the city economy and helping to create strong, sustainable and healthier communities, enabling all residents to enjoy a high-quality of life. In doing so, the LDP supports Edinburgh's role as Scotland's capital city and recognises its importance as a key driver of the Scottish economy.

The application site is located within the City Centre, as defined on the LDP Proposals Map. In this regard, LDP Policy Del 2 is relevant. It states 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 a capital city.

The proposal seeks to create a diverse, thriving, welcoming and successful place which is integral to Edinburgh's role and functioning as a capital city, a regional service centre and major tourist destination. In order to maintain an intensively developed, vibrant city centre character, a wide range of uses are encouraged, including commercial leisure use, offices, community and cultural facilities and where appropriate libraries, education and healthcare facilities. Leisure, community, cultural and education uses are all provided for in the proposed development and all appropriate to the location of the site, its accessibility characteristics and the character of the surrounding area, thus complying fully with LDP Policy Del 2b). The benefits of these uses are assessed further in section 3.3n).

LDP Policy Del 2c) requires, where practicable, that offices be provided as part of major mixed-use developments. Although this is not considered a major mixed-use development, the applicant (IMPACT Scotland) and other associated parties will occupy the existing office building at 35 St Andrew Square and RBS will retain their bank branch and associated office space within Dundas House. These existing office uses will complement the proposal and contribute to the overall mix on the site.

LDP Policy Del 2a) supports comprehensively designed proposals which maximise the potential of the site in accordance with any relevant development principles, development brief and/or other guidance. The proposals provide a comprehensive design which maximises the potential of the site in accordance with the principles set out in the St James Quarter Development Brief. Within this context, the Development Principles for Proposal CC1 in the LDP include reference to how the current St James development will contribute to the regeneration of this part of the city centre. In particular, reference is made to the opportunity for a new civic space and public pedestrian routes to strengthen links with St Andrew Square. The proposed development supports this aspiration through the delivery of a high-quality public realm, making the entire area between the new Edinburgh St James development and St Andrew Square accessible and permeable to pedestrians and cyclists, adding to the vitality of the city centre. The creation of new traffic-free civic spaces and pedestrian routes complies with LDP Policy Del 2d).



LDP Policy Ret 1 applies a sequential approach to the identification of preferred locations for retail and other uses (including cultural facilities) which generate a significant footfall. The location of the site is in accordance with the town centre first approach, thus complying with LDP Policy Ret 1. Likewise, LDP Policy Ret 7 supports the principle of high-quality, well designed arts, leisure and entertainment facilities and visitor attractions in the city centre provided that they make a positive contribution in terms of the type of use and quality of design, are in accessible locations and do not produce unacceptable noise and late night disturbance. The benefits of the proposed use, quality of the design, transport and amenity issues are assessed in greater detail in the sections below. Nevertheless, it can be concluded that the principle of the proposed land use is in accordance with the LDP. The proposed use would make a positive contribution towards the city's cultural, social and educational provision, in accordance with the aims and strategy of the LDP, as well as LDP policies Ret 1, Ret 7 and Del 2.

#### **f) The design is acceptable and will contribute towards a 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 states 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.

The detailed view analysis in the EIA Report has informed the understanding of distant and local views and the setting of listed buildings, monuments, conservation area, garden and designed landscape and World Heritage Site, as mentioned in sections 3a), 3b), 3c) and 3d), all of which contribute to character and sense of place. This section will consider the more detailed aspects of the design.

The Edinburgh Urban Design Panel was consulted at the Pre-application stage. Their full report is contained within Appendix 1. The Panel were supportive of the principle of a music venue in this location and acknowledged that it represented an exciting opportunity to enhance activity and permeability in the surrounding public realm. The Panel's report encouraged a coherent, high-quality public realm which enhances legibility through the site, maximises barrier-free pedestrian movement and minimises conflict with service vehicles. The Panel also advised that the proposal's relationship to its special historic setting and its impact on important axial and oblique views, particularly the view of Dundas House from George Street, is critical and requires to be carefully considered. They questioned the then asymmetric form of the building behind Dundas House and expressed a concern about the positioning of the concert hall, studio and public foyer as separate elements across the site. These concerns have been addressed within the application. The current scheme has not been considered by the Panel.

## Elevational composition and materials

A contemporary façade is proposed that reflects and adapts to its sensitive context, whilst ensuring that it stands out as a modern public building. The façade design relates to and re-interprets the architecture of the First New Town in both its order and materiality. The ordered expression of a public realm base condition, body and crown, found on other neoclassical buildings in the surroundings, is reflected in the composition of the proposed building's massing.

The ordered expression of an aligned drum bound by a series of vertical pilasters relates to the proportions and symmetry of its setting, whilst the mineral quality, texture and tone of its precast concrete reflects the surface layering, articulation and variation in the colour and tones of the neighbouring stone buildings.

The drum and its ancillary volumes come to the ground with the topography of the site rising up across its surface. These repeated vertical pilasters dictate a rhythm, only ever breaking to provide entrances demarcated with projecting metal canopies. These canopies offer cover from the elements upon entry while lit signage acts as wayfinding. The external east-west passage below the northern volume of the venue doubles as a covered loading bay and as a public route through the site.

The vertical grit-blasted concrete fins are refined with chamfered edges that are honed to reveal a more materiality rich surface. Windows sit within the vertical bays around the perimeter of the public realm, offering glimpses into the ground floor areas and provide light into the building. Slot windows perforate the body of the drum at ground level giving further expression to the eastern public realm.

Windows within the ancillary volumes are in keeping with the scale and proportion of existing openings around the site. Some are paired or consolidated to form larger groups of openings that balance their size within the extent of the solid façade and provide excellent light conditions to the interior spaces.

A parapet detail adds refinement and definition, further unifying the volumes in a manner redolent of the surrounding neoclassical facades. The roofs of the north and south blocks comprise of a metal screen, allowing ventilation of roof plant accommodation while screening it from elevated viewing positions. The drum volume is finished in a pebbled stone ballast.

The expressive top of the building manifests itself as a subtle but refined crown that announces the public nature of the building from every approach. In the evening, the crown will be gently washed with light forming a calm backdrop to the lit centrepiece of Dundas House.

The materials comprise of a series of precast, honed and grit blasted coloured concrete panels with concealed vertical joints to emphasise the vertical nature of the façade. Their top surface will be honed, removing a layer of the surface to reveal the aggregates within the material. The choice of precast coloured concrete is not only a contextual response but also provides a thick layer of acoustic mass that isolates the hall and prevents noise break out. The quality, porosity and detailing of the panels will enable the building to absorb and shed water evenly. Several design details have been integrated into the design to mitigate the risk of water staining.

As an extension to an A listed building, it is considered appropriate for the proposed material to be different and distinguishable from Dundas House. The use of honed and grit blasted concrete allows for a sculptural approach which is central to the overall design approach to create a solid robust building with a fineness of detail. The proposed use of high-quality materials which complement the main building is positive, complying fully with LDP Policy Des 4d).

Overall, the design of the development is based on a strong concept which draws upon the positive characteristics of the surrounding area. The high-quality of design complies fully with LDP Policy Des 1 and Des 3.

### Public realm

LDP Policy Des 7 supports development which enhances community safety and urban vitality and provide direct and convenient connections on foot and by cycle. The proposed development opens up the entire site to the public, creating extensive civic space and two new publicly accessible routes. The design of the public realm within the site connects a sequence of three current or planned public spaces; St Andrew Square, the reimagined St James Square and the more intimate spaces at Register Lanes.

LDP Policy Des 8 supports development where all external spaces and features have been designed as an integral part of the scheme as a whole. Overall a high-quality public realm scheme has been set out appropriate to the intended use as a setting for a new public building.

Continuity is provided within the site through the creation of a unified surface material in Scottish Whinstone, extending from the forecourt of Dundas House to the eastern entrance at Elder Street and the main entrance to the south at Register Place. Whilst sandstone is the traditional material used as a flagstone within the First New Town, Whinstone is traditionally used for kerb stones but has been selected for its tonal fit with historic buildings and slip resistance. Different unit sizes and textures are used to denote the different characters within the site and the smaller units being suited to vehicle over-run and gradient changes. The same material is proposed within the internal floorspace, thereby providing connectivity between internal and external spaces. The proposed materials not only reinforce the New Town character, but also allow for ease of movement by disabled users.

To enable level access and to widen the pedestrian access into the site, the existing stone boundary wall to the curtilage of 35 St Andrew Square will be removed. It is acknowledged that, although this wall is not original, it demarcates the original historic feu. Instead of proposing an alternative physical boundary, the amended scheme proposes a change in material finish within the rear curtilage. A picked finish to the Whinstone and a sandstone edging will help to subtly delineate the historic feu of 35 St Andrew Square whilst also enabling a seamless surface for drainage, vehicle overrun and pedestrian movement.

Provision for publicly accessible seating is integrated within the building façade as a bench element set within the fluted elevation. Benches and chair seating are also integrated within the public realm and garden areas.

To the south-east the main entrance is enhanced by means of a garden space, where five Honey Locust trees will provide a canopy over outdoor seating areas and shrub beds. Whilst spatial constraints exist in terms of circulation, the northern boundary wall with Multrees Walk is planted as a green wall with climbers using a steel framework to avoid conflict with the natural stone. The rear garden to number 35 will include small trees within planters and seating set upon the deck over the below ground accommodation. A combination of ramps and steps within the garden also negotiate the changes in level between the entrances from Register Place and Elder Street.

Lighting to the public realm is to be achieved from a variety of sources which include feature lighting to trees and planting, wash lighting low light bollards and refurbished existing historic lanterns on the perimeter of the site. The lighting has been designed to provide visual clarity to principal routes, safety and security, integration with the landscape design and a high-quality night-time experience. Section 3.3b) considers the impact on the wider lighting strategy of the building.

The proposed development complies with LDP Policy Des 7 and Des 8.

#### **g) The proposal raises any issues in respect of transport and road safety**

LDP Policy Tra 1 supports major development comprising offices, retail, entertainment, sports, leisure and other non-residential uses, which would generate significant travel demand, on suitable sites in the City Centre. It is stated that these developments should be accessible by a choice of means of transport. The central location of the proposed development makes it ideally suited to make use of established public transport connections, as well as utilising walking and cycling provision. It is therefore, aligned with LDP Policy Tra 1 and the City Mobility Plan, which prioritises walking and cycling.

#### Pedestrian access

LDP Policy Des 2 supports a comprehensive and integrated approach to the layout of buildings, streets, footpaths and cycle paths as provided for in an approved development brief or strategy. The new venue is accessible by pedestrians from three directions; St Andrew Square, Elder Street and Register Place. Demolition of the rear wall to the Elder Street hammerhead has already enabled this. The site will, therefore, contribute to the objectives of the St James Quarter Development Brief and the Council's Registers Lane Study by improving footfall and pedestrian flow, adding value, creating a new place and destination, and improving the character of the area. The Registers Lane area has been identified by the Council as a key location within the city centre, connecting Princes Street, Edinburgh St James and St Andrew Square within the immediate vicinity of the tram stop. The north and east of 36 St Andrew square, in particular, has been identified as one of the four main areas of development. The application complies with LDP Policy Des 2.

LDP Policy Des 7 supports development which enhances community safety and urban vitality and provide direct and convenient connections on foot and cycle. The Transport Statement demonstrates that the available footway within the site will be able to accommodate the high level of pedestrian activity associated with the proposed use, with the northern route being the same scale as Multrees Walk.

Furthermore, the level change of two metres from north to south on the east boundary has been overcome by creating a new ramped walkway. This enables the public realm to be fully accessible for all users. The applicant is proposing to further enhance pedestrian movement along St Andrew Square through the provision of a continuous footway and dropped kerbs, built to full carriageway construction to accommodate a range of service vehicles. The delivery of this is secured through a condition. The application complies with LDP Policy Des 7.

### Vehicular access

St Andrew Square will be the main vehicular access and servicing point into the site. Averaged over the course of a year, and based on 298 days of performances per year, it is anticipated that there will be approximately four inbound HGV movements and four outbound HGV movements per week. On exceptional occasions (once every 6 months), a 16.5m articulated vehicles may also be used.

All the paved surfaces will be designed for vehicular overrun to enable fire and maintenance access to all facades of the building. The service route to/from the loading bay will, at all times, remain a high-quality pedestrian area as its primary function. Vehicle access is also required into the forecourt for the RBS branch operation. A consolidated waste strategy for the new venue, 35 St Andrew Square and the RBS branch is provided. To enable vehicular access into the site from St Andrew Square, dropped kerbs are proposed directly in front of the two front gates. Through the provision of swept path diagrams, it is demonstrated that these arrangements are acceptable, subject to suitable management. The diagrams indicate that the articulated vehicles will pass into the prohibited tram zone. An informative has been included which requires the applicant to arrange for the necessary permits and authority from Edinburgh Trams.

The loading bay for the new building is located to the north of the back-of-house technical core. It sits immediately adjacent to the large format service elevator, back-of-house lift and stair. This service elevator links the main performance spaces and dedicated storage areas to the loading dock. Although the loading bay can be accessed via St Andrew Square with vehicles up to 16.5m in length, the vast majority of all vehicles servicing the venue throughout the year will be 10m or less in length. During loading and unloading operations, temporary security barriers will be erected around the dock area to ensure that pedestrian safety and security is maintained during all operations. When not in use the loading bay will be fully opened to extend the public realm through the building and further improve the public permeability through the site. Through the design development, the applicant explored a number of potential underground service arrangements. However, these options were not operationally or financially viable.

### Parking

The existing office development has 95 parking spaces. The proposed development does not propose dedicated on-site car parking. The Edinburgh Design Guidance could permit up to 42 car parking spaces. However, the development is proposing zero parking due to the city centre location. Servicing access is managed by bollards at the entrance of the forecourt. These have been located to allow vehicles to wait within the site without blocking the footway, minimising potential conflict with pedestrians.

It is acknowledged that there is a large public car park consented as part of the Edinburgh St James development, which will be available for all uses within the wider area. This complies with LDP Policy Tra 2.

There is no designated disabled drop-off and pick-up on-site due to the highly accessible nature of the site. Disabled drop-off and pick-up will be possible via Elder Street, affording direct and level access to the main entrances of the new venue.

Edinburgh Design Guidance indicates that motorcycle parking provision should allow for one space for visitors and a minimum of one per 25 staff. However, as the proposed development will not be associated with any private motorised vehicle, it is accepted that no motorcycle parking will be provided on-site. Furthermore, there are numerous motorcycle parking spaces already available in close proximity to the site around St Andrew Square and on George Street.

The Edinburgh Design Guidance stipulates that cycle parking should be provided at a minimum of one stand per 50 seats, providing a minimum provision of 20 cycle parking spaces. Five long-stay cycle parking stands providing ten spaces will be primarily for use by staff and will be weather protected, lit and have controlled access. The long-stay parking will be distributed between two separate, but closely located, covered, secure buildings. Both facilities are conveniently located for access from St Andrew Square and the north building entrance. The application also proposes six uncovered Sheffield cycle parking stands within the public realm approximately 18m from the main south facing venue entrance, providing space for a further 12 bicycles. In addition, there are a further eight existing general use cycle parking racks located on the south-east corner of St Andrew Square, in close proximity to the development site. In this regard, combined with the eight off-site spaces, this would amount to a total of 20 short stay spaces within short distance of the front entrance and an additional 10 long-stay spaces for staff accommodated to the north of the site. This is acceptable.

This provision meets the requirements set out in the Edinburgh Design Guidance and complies with LDP Policy Tra 3 and Tra 4.

### Transport infrastructure

Policy Del 1 states that proposals will be required to contribute to the existing and proposed tram network. The site is located in Zone 1. In this regard, the Roads Authority have advised that the applicant will be required to contribute the net sum of £86,666 to the Edinburgh Tram in line with the approved Tram Line Developers Contributions report and Circular 3/2012. This amount will be secured by a suitable legal agreement prior to the issuing of a formal consent.

### **h) The proposal will have a detrimental impact on the amenity of nearby residents**

LDP Policy Des 5 relates to the amenity of existing and future occupiers and seeks to ensure that amenity is not adversely affected by new development. Representations have been made concerning the development's impact on residential amenity to St James Square. The application site is within close proximity to a number of residential properties and on the boundary of their existing communal garden space. The Edinburgh Design Guidance informs compliance with LDP Policy Des 5.

## Daylight

A daylighting study has been submitted by the applicant which applies the Council's recommended Vertical Sky Component (VSC) approach to assessing impact of development on the ratio of daylight available to existing properties. The Edinburgh Design Guidance requires that the amount of daylight reaching an external wall must be more than 27%, or 0.8 of its former value. For those windows that failed the VSC assessment, these have been re-assessed using the Average Daylight Factor analysis (ADF) which assesses internal spaces using assumed internal plan form. As the room types behind these windows are unknown and might vary between apartments, the analysis has been run for bedrooms (ADF of 1%), kitchens (ADF of 2%) and living rooms (ADF of 1.5%), which are protected.

The detailed study tested 76 residential windows on the west gable and northern and southern elevations of the existing residential building at St James Square, as well 128 windows on the two consented residential blocks within the Edinburgh St James development. The results show that, depending on the usage of the room within the St James Square tenements, there may be 18 windows on the west gable and northern elevations of the existing tenement where daylighting levels will be reduced below the targets set out in the Edinburgh Design Guidance. This is a result of the building's height and proximity to the windows. These were assessed using the ADF analysis.

On the west gable elevation, all four rooms tested using the ADF analysis fail in the existing and proposed condition for all room types. However, gable and side windows are generally not protected under the provisions of the Edinburgh Design Guidance.

Out of the 13 rooms on the northern elevation assessed using the ADF analysis, four rooms passed as bedrooms (six fail under the existing conditions), 12 rooms fail as living rooms (nine fail under the existing conditions) and 13 rooms fail as kitchens (all of which fail under the existing condition). The difference in ADF percentages between the existing and proposed is between 0.09 and 0.43 based on the percentage criteria for each room type as set out above. Whilst 0.09 impact is likely to be marginal, the 0.43 indicates that there will be impacts upon daylight. However, this is within the context of a heavily built up city centre environment and none of the ADFs have a reduction of more than 31% of their existing values.

The Edinburgh Design Guidance states that the layout of buildings in an area will be used to assess whether the proposed spacing is reasonable. In some parts of the New Town, for example mews lanes buildings come close together similar to that proposed. It is evident that, dependent on the use of the rooms on the northern elevation, between 69 and 100% of the rooms assessed fall under the targets set out in the Edinburgh Design Guidance. However, because of the unique historic and urban context of the New Town, this infringement of the guidance and LDP Policy Des a) is not significant enough to merit refusal of planning permission.

## Sunlight to existing spaces

The applicant has conducted a sunlight impact assessment on existing gardens and spaces for each hour of the day on the spring equinox (21st March), as required by the Edinburgh Design Guidance.

If a space is used all year round, the equinox is the best date for which to prepare shadow plots as it gives the average level of shadowing. The study demonstrates that of the three garden spaces tested, there will be a reduction in sunlight to the communal garden space of the residential tenement at St James Square as a result of the proposal.

The level of sunlight into this space on 21 March remains the same between 0700 and 1200 hours. However, sunlight is significantly reduced between 1300, 1400 and 1500 hours. At 1300 hours the garden drops from 40% of the area experiencing direct sunlight to 27.6%. At 1400, the garden drops from 63.3% of the area experiencing direct sunlight to 11.4%. At 1500 hours the garden drops from 31% to no longer receiving any direct sunlight. This reduction in sunlight would impact on the quality of the usable amenity space for existing residents. However, because of the unique historic and urban context of the New Town and giving due consideration to all other material issues, this infringement of guidance and LDP Policy Des 5a) is not significant enough to merit refusal of planning permission.

### Sunlight to new spaces

The applicant has also assessed the potential sunlight hours with respect to all new civic spaces within the development. The study demonstrated that 50.29% of the proposed new public spaces receive three or more hours of sunlight during the spring equinox. These areas relate to the proposed seating areas. This complies with the Edinburgh Design Guidance.

### Privacy and outlook

An assessment of the impact on privacy and outlook to the neighbouring residential tenement at St James Square was submitted with the application. Revisions were made to the design to limit exposure of the existing residential building to the windows on the eastern façade. The amended scheme not only reduces the overall number of windows on this elevation due to its functional form, but also relocates them away from the window openings of the existing residential building. In this regard, the majority of the venue's façade is opaque with selected window openings placed away from the residential building or screened by the interlocking massing of the design.

The scale, mass and form of the proposed building has been carefully designed to ensure the existing privacy and outlook of existing residential units is not compromised. There is no impact on privacy.

Although private views are not protected, immediate outlook of the foreground of what can be seen from within a building can be. As a result of the height, scale, massing and proximity of the new building, the immediate outlook of the western gable of the existing tenement building at St James Square will be altered to a degree to offer limited outlook. However, this tenement is hard on the boundary of private land, outlook is not protected in this case.



## Noise

A revised Noise Impact Assessment was submitted with the revised scheme. It demonstrates that the design of the building meets expected standards for protecting the amenity of nearby residents in terms of music, operational and plant noise from the premises. The performing spaces have been designed to provide a high sound insulation performance, in order to allow simultaneous use with minimal mutual disturbance. This consequently provides effective control of noise emissions to neighbouring buildings.

Noise from loading has also been assessed. The loading dock has been positioned to the north of the building, with the loading side of the vehicle positioned on the west of the loading dock, so that loading activities will be located away from the neighbouring noise sensitive buildings. No night-time (2300 to 0700) loading activities are proposed. Where vehicles need to reverse within the site during late evenings, banksmen will be employed to direct reversing without the use of audible alarms. The applicant intends to create a noise management plan for loading activities, outlining the required loading protocol to ensure noise from such activities to neighbouring buildings is minimised.

Predictions have been provided of likely crowd movement and noise levels generated by entrance and egress from the venue, taking account of the Edinburgh St James development. The design proposes several access routes to help maximise the speed with which people exit an event. It is anticipated that the majority of patrons will access the venue via the main entrance which faces south, with patrons arriving and leaving via St Andrew Square where public transport and taxis are located. The study demonstrates that, taking account of the anticipated frequency, duration and timing of the events, there will be minimal impact on the amenity of nearby residents. It is stated that an Event Management Plan will be prepared by the operator, which will cover noise control from patrons.

The Council's Environmental Protection Service is satisfied with the measures proposed in the assessment and raise no objection.

## Odour

The location of the kitchen extract is shown on drawing 131. It is 36m away from the neighbouring residential building windows. The height of the exhaust point is 88.97m AOD. This is 1.99m higher than the eaves height of the nearest residential building. In accordance with the Council's Environmental Protection Service guidance, a condition relating to the kitchen ventilation, to ensure that it is capable of achieving 30 air changes per hour to avoid cooking odours escaping into any neighbouring sensitive premises, is recommended.

## Conclusion - neighbouring amenity

The proposal has been designed to minimise any potential negative impact on its neighbour and raises no issues in respect of privacy, outlook, noise and odour. It is accepted that the proposal will infringe LDP Policy Des 5a) with respect to levels of daylight and sunlight into the neighbouring tenement building and garden space.

However, this is considered to be a minor infringement given the unique urban historic context, neighbouring property relationship and the proposed public/civic use. An infringement can be justified given the wider benefits of this case.

### **i) The proposals are sustainable**

The applicant has completed an S1 Form in support of the application, which confirms that the required sustainability criteria have been achieved. In addition to the essential criteria, the applicant has provided a commitment to further sustainability measures as set out in the 'desirable elements' sections, including the provision of Air Source Heat Pumps. Design measures have also been implemented to reduce the environmental impact of the construction of the building, including applying materials that have an inherently low embodied carbon, and the use of materials that have a high recycled material content.

In addressing the requirements of LDP Policy Des 6 a), applicants for major developments within the opportunity areas identified in the Heat Opportunities Mapping Supplementary Guidance must demonstrate the approach taken to identify whether a heat network is viable. The applicant has submitted a district heating analysis for the proposed development. The Scottish Government Heat Map illustrates that the development is in a high heat density area, with the closest district heating network 350m away at the Balmoral Hotel on Princes Street. This network is currently under development. The applicant has confirmed that, within the next stages of design, consideration is being given to providing the facilities to allow future connection into this district heating network.

By implementing the above energy and sustainability strategies, the proposed development complies with the requirements of LDP Policy Des 6.

### **j) The proposal raises any issues in respect of flooding and drainage**

LDP Policy Env 21 ensures development does not result in increased flood risk for the site being development or elsewhere. A Drainage Impact Assessment and Flood Risk Assessment was submitted with the application. No significant current risks of flooding or sewer capacity issues were identified in the local area based on an initial desktop assessment. However, a number of residual flood risks have been identified, associated with flooding from blockage/pump failure/surcharge of public sewers, site drainage and burst water supply pipes, groundwater and intense rainfall in excess of the capacity of the drainage. Subject to a number of mitigation measures to be incorporated at the next stage of design, the proposed scheme is considered appropriate for the hydrological setting and acceptable in flood risk terms. The Council's Flood Planning Service were consulted and are satisfied that it addresses the Council's requirements. The application complies with LDP Policy Env 21.

Sustainable Urban Drainage Systems (SUDS) will be incorporated in the design. This will be achieved through utilising a combination of storage systems, soft landscaping and permeable hard landscaping. A condition has been recommended which secures the detail design, location, size and maintenance of the SUDs.

### **k) The proposal raises any issues in respect of archaeology**

In order to safeguard the archaeological interests of the existing building and the earth below, the use of a condition is recommended to ensure compliance with LDP Policy Env 9. This would require a site survey to be undertaken to secure the recording of historic buildings and excavations, before development commences on site.

### **l) The proposal raises any issues in respect of ecology and trees**

LDP Policy Env 16 supports development that would not have an adverse impact on species protected under European or UK law. An updated Bat Survey of the site has been undertaken and bat activity within the site was recorded to be very low, indicating the site has negligible importance for commuting or foraging bats, likely due to its city centre location. In the unlikely event that a bat is discovered during the proposed development, the applicant has been made aware of what action to take.

LDP Policy Env 12 states that development will not be permitted if likely to have a damaging impact on any tree worthy of retention, unless necessary for arboricultural reasons. Where such permission is granted, replacement planting of appropriate species and numbers will be required to offset the loss to amenity. There is one existing tree within the site. The species is Swedish Whitebeam. A tree survey has been submitted, which identifies the tree as having internal decay and a life expectancy of less than five years. It is therefore, recommended that the tree is removed.

In its place, the application is proposing five new Honey Locust trees within the primary public realm and circulation space to the south east near the main entrances. The planting conditions for these trees will be optimized through the use of proprietary tree cells to provide a decent amount of growing space below ground for each tree. In addition to the trees, 274 shrubs are proposed in the north west and south east of the site. A green wall comprising of 232 climbing plant is proposed along the northern boundary wall to Multrees Walk. The ecological potential of the site is enhanced through the introduction of new trees, shrubs and climbers. The application complies with LDP Policy Env 12.

### **m) The proposal raises any issues in respect of air quality**

LDP Policy Env 22 supports development where there will be no significant adverse effects for health, the environment, amenity, air, and soil quality, the quality of the water environment or on ground stability. There is considered to be no impact on Air Quality as a result of there being no car parking on site, no public vehicular access through the site and it being located on a site with high public transport accessibility. An Air Quality Impact Assessment was not required as part of the application. This was based on the fact that the proposed development provides no significant new combustion plant and the changes in operational traffic flows predicted did not reach the threshold for likely significant air quality effects from vehicle traffic. The application complies with LDP Policy Env 22.

## **n) Other material considerations**

### Social and cultural impacts

The applicant has submitted a Socio-Economic and Cultural Impact Assessment to support the application, a topic which was also scoped into the EIA Report. These impacts have been assessed and form a significant material consideration in the determination of the application.

The proposed concert hall will be the first new mid-sized facility of its kind to be built in Edinburgh for 100 years and is the culmination of a 25-year search by the Council and the Scottish Chamber Orchestra (SCO). The need for a new venue has arisen due to the existing physical challenges and constraints associated with the Queen's Hall, the existing home of the SCO. The new venue completes the task of equipping all the national performing companies with modernised working conditions. Being the new permanent home to the SCO, the new venue will be equipped with the highest quality acoustics, clear sightlines, services and foyers. With flexible settings for stage and seating, it is also designed to accommodate a wide variety of music types, including traditional and contemporary, acoustic, pop, jazz and world music, as well as other chamber orchestras, ensembles and solo classical artists.

Creative learning and inclusive outreach will also have a prominent position in the new venue, offering wider community benefits to the city. This will build on the substantial experience of SCO's Creative Learning team, as well as facilitate the development of new strands of engagement with other partners. National Youth Choir of Scotland (NYCOS) will join IMPACT Scotland in their offices at 35 St Andrew Square. Their proximity to the new venue allows them to establish a regional training choir and an ambitious singing programme for communities across Edinburgh. A school for traditional music is also proposed. It is planned that all these initiatives will be designed to complement existing provision in the city and surrounding area. By being able to work with new partners, the design of the whole venue will address audience development and promote inclusion through the diversity of the musical offering and an audience focused approach to programming. The building's architectural appeal, its welcoming internal and external public spaces and central location will attract a wide range of people.

Through the delivery of a wide ranging educational and community programme, the new venue will also develop opportunities to involve those socio-economic groups currently under-represented as participants or audiences. A key aspect of this programme will be to engage people through lifelong learning, addressing the needs of all age groups through different stages of life. This work ranges from early-years music-and-movement to dementia care, covering education and community residencies (nursery, primary and secondary), special concerts for young people, Vibe (youth-music fusion initiatives), creative projects with children, university residencies and special-needs programmes. The proposed development creates the opportunity to present existing activities in a new city centre base that is able to utilise all the resources of the partners, the building, the auditorium, rehearsal hall and the studios, increasing overall effectiveness and efficiency. New digital facilities will also greatly increase the SCO's ability to reach out to wider audiences and retain contact with the more distant communities within Scotland.

The above activities will be supported by the appointment of a full time Education Officer and the letting of rehearsal space for educational outreach activities at no or little cost. These key aspects of the scheme are to a large extent, exemplified by the experience of the Royal Scottish National Orchestra (RSNO) in Glasgow. In 2015 the RSNO moved to a new custom-built rehearsal hall, providing new facilities that allowed them to embark on a series of initiatives that had not been possible in their previous accommodation. This resulted in their new venue attracting and engaging some 30,000 additional people per year.

The proposed development also supports the inclusive growth framework set out in the City Deal. Two of the five framework themes are pertinent to the current proposals. These are 'a significant programme of construction' and 'social benefit through innovation'. With regard to the first theme, IMPACT Scotland will, in the construction and subsequent operating phase of the venue, use agreed City Region Deal procurement Community Benefit clauses to support inclusive employment practices and other opportunities to meet inclusive growth targets. With respect to the second theme, consideration has been given to how the project can make a positive contribution to inclusive growth by influencing and supporting the cultural sector in building audiences that reflect the true, diverse nature of the City Region.

The Council's Culture Plan (2015) outlines a number of key objectives to develop the culture of the city. Three of these are particularly relevant for the proposed development:

- Support greater partnership working in the cultural and creative sectors and maximise resources available to help them thrive all year round;
- Develop and support the infrastructure which sustains Edinburgh's cultural and creative sectors and
- Invest in artist and practitioner developer and support and sustain the local artistic community.

Through a close working partnership with the Edinburgh International Festival, the new venue will provide a world class venue for supporting and developing the Festival. IMPACT Scotland has also established early relationships with other music and performing arts companies who would use the venue for performances and rehearsals. These include the National Youth Choir of Scotland, Red Note Ensemble, Celtic Connections, BBC Scottish Symphony Orchestra, as well as identifying community engagement projects with the SCO. As the first substantial new performance venue to be built in Edinburgh for 100 years, it reflects the city's ambitions and achievements as a Festival City with an expanding role in the creative and cultural industries. A 10-year strategy for Edinburgh titled 'Edinburgh Festivals: Edinburgh Hooves 2.0' prepared in 2015 by BOP Consulting and Festivals and Events International highlighted the importance of supporting proposals for new venues in order to achieve this ambition of Edinburgh as 'The Festival City'. In this regard, the proposed development aligns with the City's strategic aims with regards to culture, by creating additional infrastructure to reinforce and rebalance the creative sector and engage with the wider community.

However, it is acknowledged that there will be an issue around displacement of activity with the proposed venue. With a capacity of 1,000, it will divert some performance activity away from existing venues such as the Usher Hall and Queen's Hall. Both of these venues host performance, rehearsal and recording activity by the SCO, which would all move to the new venue.

It is anticipated that the Queen's Hall would experience the most impact due to the similar capacity levels, and it is currently generating revenues from being the principal box office for the SCO. To mitigate this impact and ensure a strategic and co-ordinated approach to the future programming of key music venues in the city, the Council will chair a working group including representatives from IMPACT Scotland, the Queen's Hall, Leith Theatre and the Usher Hall. The working group will ensure that a balanced and co-ordinated diary of events is planned and marketed for the city. The supporting information suggests that discussions with existing venues have confirmed that the new venue will be complementary to existing provision and welcome the competition and dynamism that the new venue offers in building and enhancing Edinburgh's reputation as a great city for live music.

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

The cultural and wider community benefits to the city, region and nation, brought about as a result of the proposed development in this location and the opportunities for advancement it provides, are acknowledged and supported in the EIA Report. The proposed use would make a positive contribution towards the city's cultural, social and educational provision.

### Economic impacts

The application proposes the removal of the office block to the rear of Dundas House which has the potential to cause a negative effect by taking away productive office space in the city centre. The Council's Economic Development Service were consulted on the application, estimating that, if fully occupied, the existing building could directly support a total of 161 FTE jobs and £26.2m of GVA per annum (2019 prices). The Socio-Economic and Cultural Impact assessment provided by the applicant for the proposed use suggests that the development would directly support 23 headcount jobs and £0.8m of GVA per annum. If multiplier effects and other indirect impacts are considered, these figures rise to 134 headcount jobs and £4.6m of GVA per annum for the proposed development versus 440 FTE jobs and £42.9m of GVA per annum (2019 prices) for existing building. While in theory the existing building could contribute £42.9m GVA per annum, it is unoccupied and the existing owner does not intend to use it given its age and condition. Although the development of a new performance venue is expected to have strong social and cultural impacts, as outlined in the section above, the Socio-Economic and Cultural Impact Assessment and EIA Report demonstrates more limited economic impacts.

However, it is considered that the economic impacts of the new venue are more indirect, being closely related to tourism. The interaction between cultural venues within the city and the relationship of the new venue to the festivals means that the economic benefits could be greater than would normally be expected in most other locations. The two main aims of Edinburgh's Tourism Strategy are to increase the value of tourism to the city and to its tourism industry, and to enhance the city's image and reputation.

To achieve these aims, the strategy outlines three objectives to be achieved by 2020. These are to:

- Increase the number of visits to the city by one third, from 3.3 million to 4.4 million visits;
- Increase the average spending of visitors to the city by 10%; and
- Reduce seasonality across the sector, by achieving half of the increased visits from the first objective in the months from October to March.

The strategy also identifies the lack of a suitable venue for live performances as a key challenge in improving the city's tourism appeal. The proposed venue will make a significant contribution to filling an identified gap.

The Council's Economic Strategy aims to deliver growth for everyone and sets out 10 steps Edinburgh needs to take in order to achieve this aim. One of these is to deliver sustainable and inclusive growth in Edinburgh's world leading culture and tourism sectors. The Strategy recognises the importance of culture and tourism to Edinburgh's global reputation and success as a city. It suggests there is a need to take new approaches to ensure the growth of these sectors is sustainable in the long term and provides a good balance between the needs of residents and the needs of visitors. It also highlights the need to make new investment in facilities in order to maintain Edinburgh's position as a world leading city. It specifically cites the delivery of a new world-class performing arts venue in the heart of Edinburgh as a key action and an example of investment it supports, making specific reference to the Impact Centre by name.

The site forms part of the wider Register Lanes area. The aspiration is that developments such as Edinburgh St James, The Registers and this site will enliven this area. The proposed development would be accessible by pedestrians from Register Place, adding considerable additional footfall to this area.

### Conclusion - social, cultural and economic impacts

The proposal creates a positive social and cultural impact and will play an important role in supporting the growth and success of Edinburgh's tourism, cultural and education sector, thus being aligned with the Council's Economic Strategy, Culture Plan and City Deal framework.

### **o) Environmental Impact Assessment Report**

An EIA Report has been provided alongside the application. This provides an assessment of the impact of the development in environmental terms, covering Cultural Heritage, Socio-Economics and Townscape and Visual. An addendum to the EIA Report was also submitted in February 2019 which included revisions to a selection of the verified views. A second addendum to the EIA Report was submitted in August 2021 which assessed the impact of scheme three. The scope of the EIA Report is acceptable, the content comprehensive and the methodologies used for the landscape/townscape and visual assessment are considered appropriate. Sufficient information has been submitted in the EIA Report to allow a balanced judgement to be made regarding resulting impacts. Therefore, this report not only provides an assessment of the proposal in planning terms, it has also considered the conclusions of the EIA Report.

## **p) Impacts on equalities and rights are acceptable**

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

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

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

An Integrated Impact Assessment (IIA) has been carried out and is viewable on the Planning and Building Standards Online Services.

The creation of a high quality environment offering level access throughout and a new public building with accessible facilities will have a positive impact on disabled users. The site is very accessible by a range of public transport methods, including the tram which offers good disabled facilities. The venue itself will offer education and cultural learning facilities which could offer a positive impact on the health and wellbeing of all populations. Creative learning and inclusive outreach will have a prominent position in the new venue, including early years music and movement, special concerts for young people, creative projects with children, university residences and special needs works, as well as dementia care. The applicant has also agreed to use City Region Deal procurement Community Benefit clauses to support inclusive employment practices and other opportunities to meet inclusive growth targets. This includes involving those socio-economic groups currently under-represented as participants. The venue will also let the rehearsal space for educational outreach activities at no or little cost. These will have a positive impact on those vulnerable populations falling into poverty. It can be concluded, therefore, that this is a significant public venue with wide ranging community benefits.

## **q) Public representations have been addressed**

### Material representations objecting to scheme three

- Question the need for a new cultural venue in the city. This is addressed in section 3.3e) and 3.3n);
- Inappropriate height, scale, massing, position on site, design and materials. This is addressed in section 3.3a) and 3.3f). The height of the main concert hall volume has been reduced in scheme three.
- There will be an adverse impact on the character and appearance of the New Town Conservation Area and Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site. This is addressed in section 3.3a) and 3.3d);
- There will be an adverse impact on the axial key views along George Street. This is addressed in section 3.3a);



- There will be an adverse impact on the character and setting of the A listed Dundas House including the interface with the new building and existing boundary walls, and the setting of other A and B listed buildings adjacent to the site. This is addressed in section 3.3b);
- Inappropriate landscaping and planting strategy for the site. This is assessed in section 3.3f) and l);
- Increased noise levels from the operations of the new venue, including the now open loading bay. This is addressed in section 3.3g) and 3.3h);
- Reduced daylight, sunlight, privacy and outlook into neighbouring properties. This is addressed in section 3.3h);
- Concern over potential flooding of neighbouring properties as a result of the new development and proposed drainage strategy. This is addressed in section 3.3j);
- Concern over the management of the construction stage including structural damage to Dundas House and neighbouring listed buildings. This is particularly the case given the proximity of the new development with its neighbours. - Such controls are not regulated under planning legislation. Construction issues will be managed and controlled through a Construction Management Plan that will be developed with the appointed contractor at the appropriate time. An informative relating to the Construction Management Plan has been included;
- Suggests that an alternative site would be more appropriate for a concert hall. Alternative sites were assessed by the applicant. The benefits of the scheme can only be met in this location. This is addressed in section 3.3e) and 3.3n);
- Concern over the impact on the existing residential waste bins on Elder Street. These will not be impacted by the development as vehicular servicing will no longer take place from Elder Street;
- Concerned over the number of inaccuracies contained within the Heritage Statement. Adequate information has been provided to make an informed judgement and assessment of the application; and
- Concern over the lack of engagement with the neighbours. The applicant's engagement strategy is contained with the Pre-application consultation report which exceeds minimum requirements. All neighbours were notified of all three schemes.

### Material representations in support of scheme three

- Edinburgh lacks a mid-size concert hall and a fit-for-purpose home and venue for the Scottish Chamber Orchestra, Edinburgh International Festival and other cultural events. This is assessed in section 3.3n);
- It is a well-considered high-quality design (externally and internally) that integrates sensitively with the surrounding context, becoming a positive addition to Edinburgh's skyline. This is assessed in section 3.3c), 3.3e) and 3.3f);
- The new venue will bring significant cultural, economic and tourism benefits to the city. This is assessed in section 3.3n);
- The site is well located in the city centre within close proximity to a range of public transport choices and the new St James Quarter. This is assessed in section 3.3g);
- The site is well located in the city centre to contribute to the regeneration of the city's east end, being within close proximity to a number of other developments such as Malmaison, Gleneagles, The Edinburgh Grand and the restaurants around St Andrew Square.

- Integrates with other neighbouring developments through the provision of new public spaces and permeable pedestrian links through the site. This is assessed in section 3.3f) and 3.3g);
- Supports the demolition and replacement of the unattractive existing 1960s office annexe to the rear of Dundas House. This is assessed in section 3.3a) and 3.3f);
- The design would positively contribute towards the character and setting of the World Heritage Site and New Town Conservation Area. This is assessed in section 3.3c) and 3.3e); and
- Support the proposed concrete panels and their high specification of finish. This is assessed in section 3.3a) and 3.3f).

#### Other material general comments to scheme three

- The single mature beech tree currently extant on the site is most likely a remnant of the former garden landscape of Dundas House and should be retained. This is addressed in 3.3l);
- Consider that greater distinction between the elliptical hall section and the northern edge block would be beneficial. The design has been assessed in section 3.3f);
- Consider that the views from Elder Street present a hostile frontage with a blank façade and vertical striations. This is addressed in 3.3a) and 3.3f);
- Concern that the physical connection with Dundas House is more direct and substantial resulting in a more significant impact to the listed fabric. This is addressed in 3.3b); and
- Consideration should be given to the creation of a processional route through Dundas House. The application includes an entrance route through Dundas House into the foyer of the new building for occasional access. RBS will continue to use Dundas House as their branch and office.

#### Other non-material representations objecting to scheme three

- Suggest instead that the Council purchase the site and develop it as a public garden. - This is not relevant to Planning and
- There will be an increase in litter as a result of the increase in people within the area. - This issue is not relevant to Planning.

#### Non-material representations in support of scheme three

- The development has been designed by an internationally acclaimed architect. This is not a relevant planning consideration.

#### Other non-material general comments to scheme three

- Advocate that access to the several garden areas by the Registers of Scotland be undertaken at the same time for example a new discrete opening in the existing wall of the Archivist's Garden; and
- The design team have consulted widely throughout the local business community.

### Material representations in support of scheme one and two

- Edinburgh lacks a mid-size concert hall and a fit-for-purpose home and venue for the Scottish Chamber Orchestra, Edinburgh International Festival and other cultural events. This is assessed in section 3.3n);
- The development will add vitality and cultural activity to the east part of the New Town. This is assessed in section 3.3b), 3.3.d), 3.3e) and 3.3n);
- Integrates with other neighbouring developments through the provision of new public spaces and permeable pedestrian links through the site. This is assessed in section 3.3f) and 3.3h);
- It is a well-considered high-quality design (externally and internally) that integrates sensitively with the surrounding context, becoming a positive addition to Edinburgh's skyline. This is assessed in section 3.3a), 3.3b), 3.3d) and 3.3f);
- The new venue will bring significant cultural, economic and tourism benefits to the city. This is assessed in section 3.3n);
- The site is well located in the city centre within close proximity to a range of public transport choices. This is assessed in section 3.3g);
- Supports the demolition and replacement of the unattractive existing 1960s office annexe to the rear of Dundas House. This is assessed in section 3.3b) and 3.3f); and
- The design would positively contribute towards the character and setting of the World Heritage Site and New Town Conservation Area. This is assessed in section 3.3a) and 3.3d).

### Material representations objecting to scheme one and two

- Question the need for a new cultural venue in the city. This is addressed in section 3.3e) and 3.3n);
- Inappropriate height, scale, massing and materials. This is addressed in section 3.3a) and 3.3f). The height of the main concert hall volume has been reduced in scheme three.
- There will be an adverse impact on the character and appearance of the New Town Conservation Area and Outstanding Universal Value of the Old and New Towns of Edinburgh World Heritage Site. This is addressed in section 3.3a) and 3.3d);
- There will be an adverse impact on the axial key views along George Street. This is addressed in section 3.3a);
- There will be an adverse impact on the character and setting of the A listed Dundas House including the interface with the new building and existing boundary walls, and the setting of other A and B listed buildings adjacent to the site. This is addressed in section 3.3b);
- Increased noise levels from the operations of the new venue, including the loading bay. This is addressed in section 3.3g) and 3.3h);
- Reduced daylight, sunlight and privacy into neighbouring properties. This is addressed in section 3.3h);
- Objects to the inclusion of Dutch Elm as the predominant tree species. Dutch Elm has been removed from Scheme Three.
- Concern over the health of the Dutch Elm Tree located between the tenement and the concert hall due to lack of sunlight - The Dutch Elm Tree has been removed from Scheme Three;

- Concern over the proposed servicing arrangement from Elder Street and St Andrew Square, existing parking situation and safety for pedestrians. This also includes the removal of the bollards located directly adjacent to number 37 St Andrew Square as they currently provide building protection against vehicular movement. - The bollards do not appear to have consent. The application proposes to replace these with a high-quality public realm. No servicing will take place from Elder Street. This is addressed in section 3.3g);
- Concern that the application has not been tested in a wind tunnel to ensure pedestrian safety. - The Council's Environmental Protection service has reviewed the extent of the proposal and its impacts and has not requested any information on this matter. It is not considered to have a significant effect in the same way as a high-rise urban block might;
- Concern over potential flooding of neighbouring properties as a result of the new development, including its proximity. This is addressed in section 3.3j);
- Concern over the management of the construction stage including structural damage to Dundas House and neighbouring listed buildings, traffic, noise, vibration and dust. This is particularly the case given the proximity of the new development with its neighbours. - Such controls are not regulated under planning legislation. These are regulated under the Control of Pollution Act 1974, which gives environmental health officers the powers to control noise and vibration pollution from construction sites. Construction issues will be managed and controlled through a Construction Management Plan that will be developed with the appointed contractor at the appropriate time. An informative relating to the Construction Management Plan has been included. The vast majority of construction vehicles will access the site from Elder Street;
- The application fails to identify the consented hotel at number 37 St Andrew Square as a noise sensitive receptor in the context of this proposed use. - Hotels would not be considered a noise-sensitive receptor in the context of this proposed use, given the relative amount of transience in their guests and short periods of exposure. The impact on nearby residents is assessed and reflected in the consultation response from Environmental Protection contained in Appendix 1;
- There would be an adverse impact on key views to the Edinburgh St James Central Hotel - the outline consent for the Edinburgh St James development supported a new feature building in this location, now known as the Central Hotel. This development, currently under construction, has been included within the baseline context for the Townscape and Visual Impact Assessment. In this regard, the effect on this has been considered and it has been concluded that it can still be seen clearly in key views along George Street and in the skyline within wider city views.
- It is understood that there will be refuse bins located on Elder Street. Concern that the interaction between the articulated vehicles mounting the pavement and these bins is not clarified. - The hammerhead at Elder Street was previously identified as a potential site for the relocation of the refuse bins for the St James Square tenements. The Council's Waste Services has since confirmed that they are not supportive of residential refuse bins in this location and are currently working with the developers of the Edinburgh St James development to find an alternative location;

- The entrance should be through Dundas House. - The application includes an entrance route through Dundas House into the foyer of the new building for occasional access. RBS will continue to use Dundas House as their branch and office; and
- Suggests alternative sites, for example Shrubhill depot, are more appropriate locations for a concert hall. Alternative sites were assessed by the applicant. The benefits of the scheme can only be met in this location.

#### Non-material representations objecting to scheme one and two

- There will be an increase in anti-social behaviour. Noise associated with the development is assessed in section 3.3h) but anti-social behaviour is not controlled by the Planning Authority;
- There will be an increase in litter as a result of the increase in people within the area. - This issue is not relevant to Planning;
- Suggest instead that the Council purchase the site and develop it as a public garden. - This is not relevant to Planning;
- The triangle of land and ramp access to 23-26 St James Square, south of Elder Street, is absent from the wooden architectural model. - The model does not form part of the material submitted with the application. All the plans for approval are accurate and include the triangle of land;
- No reference has been made in the Noise Impact Assessment to the potential fire/emergency alarm testing or the paging announcements prior to recitals and at the end of intervals. - These are issues relating to the operation of the venue and not relevant to the planning assessment; and
- The height of the proposed concert hall will have a detrimental effect on the amenity of guests at the St James Central Hotel. - Private views and daylight levels into hotels and other commercial uses are not protected.

#### Non-material representations in support of scheme one and two

- There is funding largely in place to deliver the new venue. - This is not relevant to the planning assessment;
- It makes sense to convert the nearby former Royal High School building to a music school. - This site is subject to a separate planning application and therefore, not relevant to the determination of this application; and
- The plans have been consulted on widely throughout the immediate local community as well as the wider network of interest groups within the city. - Public engagement is an essential part of the planning application process and its results help to inform the finalised proposals. However, quality of the engagement process is not a material consideration in the assessment of the finalised proposals.

#### Other material general comments to scheme one and two

- Appropriate to acknowledge the stone context, advocating that a sample panel is erected on site before a final decision is taken - A sample panel has been erected on the site and taken into consideration in the determination of the application. A condition referencing this has been included and

- The origin of the single mature beech tree on the site is worthy of consideration if this is a remnant of the former garden landscape. - The Tree Survey identified this tree as having internal decay and needed to be removed. This is addressed in section 3.3l).

## **Conclusion**

### Compliance with the Listed Buildings & Conservation Areas Requirements

Due to its proximity to listed buildings and being a site within a conservation area, the proposed development first requires to be assessed against Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the 1997 Heritage Act) which provide that there is a strong presumption against granting planning permission for development which would either: (i) harm a listed building or its setting; or (ii) conflict with the objective of preserving or enhancing the character or appearance of the conservation area. If engaged, the presumption can only be rebutted if the proposals would result in significant public interest advantages which can only be delivered at the scheme's proposed location.

With reference to Section 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 the proposal does not remove or detract from key characteristic components of the conservation area that gives the area its special interest. It will contribute to the architectural quality of the area with contemporary high-quality buildings, designed to respond to its historic and modern urban environment. Therefore, the proposals are considered to preserve and enhance the character and appearance of the Conservation Area.

With reference to Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, it is considered that the proposed development will not have a detrimental impact on the character and setting of any adjacent listed buildings. The relationship of the new building with the setting of Dundas House is complex and will change depending on the point of reference and experience of the view. In views from the eastern and southern sides of St Andrew Square where the development will have a greater impact on its setting, the elevational design and form, including the set-back and oval form, mitigates some of these. Whilst it is agreed that the impact on more distant views along George Street is beneficial, there is still a minor adverse impact on the setting of Dundas House from the south side of St Andrew Square. Overall, however, it is concluded that the proposals preserve the setting of Dundas House and the application complies with Sections 59 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

### Compliance with the Development Plan

The proposed music and performing arts venue would make a valuable contribution to the city's cultural infrastructure and provide opportunities for its use by the wider community. The proposed development, which forms an important cultural strand within the City Deal, will contribute to Edinburgh's strategic aspirations in terms of culture, tourism and the economy. The location of a cultural, leisure and entertainment venue at this accessible city centre site, accords with LDP Policies Ret 1, Ret 7 and Del 2. The proposed use also complies with the relevant principles of the St James Quarter Development Brief.

The proposed venue contributes positively to the formal planned alignment of the First New Town by terminating the axial view along George Street, simplifying the backdrop to Dundas House and contributing towards the symmetry of the street. The development is, however, considered to have an adverse impact on the setting of Dundas House when seen from a public viewpoint within St Andrew Square. On the immediate approach to Dundas House, this effect will be noticeably diminished as a result of its set back position within the site. The height, scale and massing of the extension expands beyond Dundas House. However, it has been sensitively designed to reflect its immediate context and mitigate some of these impacts. In considering the scheme as a whole and against the provisions of the Development Plan and other material considerations, the development is acceptable and will make a positive contribution to the city.

The proposal has been designed to minimise any potential negative impact on its neighbours and raises no issues in respect of privacy, outlook, noise and odour. It is accepted that the proposal will infringe LDP Policy Des 5a) with respect to levels of daylight and sunlight into the neighbouring tenement building and garden space. However, this is a minor infringement given the unique urban historic context, neighbouring property relationship and the proposed public/civic use. An infringement can be justified given the existing context and wider benefits of this case.

The proposed design of the building is based on a strong concept which draws upon the positive characteristics of the surrounding area. The design seeks not to compete with the historic and distinctive built features of the New Town but rather to complement and enhance them through a positive engagement with the architecture and urban morphology of its historic setting. The overall height and form create a subtle and positive addition to the skyline, appropriate for a civic building. Likewise, through its coordinated and high-quality public realm design, it makes a significant contribution to the delivery of placemaking within the St James Quarter area, as defined in the Local Development Plan and St James Quarter Development Brief. The proposals comply fully with LDP Policy Des 1, Des 2 and Des 4.

### Material considerations

As set out in section 3.3n), the proposal creates a positive social and cultural impact and will play an important role in supporting the growth and success of Edinburgh's tourism, cultural and education sector, thus being aligned with the Council's Economic Strategy, Culture Plan and City Deal framework. This is a very significant positive material consideration.

The proposal would also form an important strategic development in the city's cultural infrastructure and create a vital stimulus for live music, musicians and audiences. As well as strengthening Edinburgh as a 'Festival City', the venue would become a focal point for engagement, learning and outreach. These arise because of the development's location, being adjacent to IMPACT Scotland's offices at 35 St Andrew Square, where the National Youth Choir of Scotland will also be located. This allows the establishment of a regional training choir and singing programme for communities across Edinburgh.

The site is adjacent to bars/restaurants and other cultural venues, which are essential for the new venue to function successfully. The site also benefits from excellent active travel and public transport links, with Waverley train station 400m walking distance, Edinburgh bus station 170m away and the tram stop 100m away on St Andrew Square. It is also close to public parking. Six alternative city centre sites were considered, but none of these were suitable, available or deliverable.

The significant social, cultural and economic benefits of siting the development in this proposed location, as discussed in section 3.3n), are a considerable material consideration. The wider community and cultural benefits of the proposed development are compelling and exceptional reasons for approving the proposals. On balance, the significant and exceptional social, cultural and economic benefits of siting the development in the proposed location, which are a considerable material consideration, are further reasons for approving the application.

There are also positive impacts on equalities and human rights arising from the creation of a high-quality environment and new public building in a highly accessible location. The creative learning and inclusive outreach will provide significant positive equalities benefits to many different populations including the young, old and disabled.

Overall, the proposal complies with the Development Plan. There are no significant adverse material considerations that would justify refusal.

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

### **3.4 Conditions/reasons/informatives**

#### **Conditions :-**

1. Prior to commencement of works above ground, full details of the proposed external light fittings on the existing and proposed building elevations, including information on light levels, shall be submitted to and approved in writing by the Planning Authority, and shall be implemented on site, in accordance with the approved details.
2. The approved hard landscaping scheme shall be fully implemented prior to occupation of the new music venue or a suitable timescale agreed in writing with the Planning Authority.
3. The approved soft landscaping scheme shall be fully implemented within the first planting season of the occupation of the new music venue. Any trees or plants which, within a period of five years from the first planting, die, are removed, or become seriously damaged or diseased, shall be replaced with others of a size and species similar to those originally required to be planted, or in accordance with such other scheme, as may be submitted to and approved in writing by the Planning Authority.



4. Prior to the commencement of construction works on site:
  - a) A site survey (including intrusive investigation where necessary) must be carried out and submitted and approved in writing by the Planning Authority. The purpose of the survey is to confirm whether the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures should be undertaken to bring the risks to an acceptable level in relation to the development; and
  - b) Where necessary, a detailed schedule of any remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Planning Authority

Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Planning Authority.

5. The proposed kitchen ventilation system shall be capable of achieving 30 air changes per hour, to ensure that no cooking odour escapes or is exhausted into any neighbouring sensitive premises, as detailed in approved drawing number 131, dated 1 October 2021, all to the satisfaction of the Planning Authority.
6. The manufacturing technique of grit blasted and honed concrete, as detailed in the Design and Access Statement and the selection of stone aggregate, as illustrated by the sample panel seen on site on 28 March 2019 and illustrated in the document titled 'Concrete Sample Panels March 2019 - revised', shall be fully implemented. Any alteration to the colour of the concrete or aggregate shall be submitted to and approved in writing by the Planning Authority.
7. Prior to occupation of the new music venue, the applicant must implement the continuous footway and dropped kerbs along the east side of St Andrew Square directly in front of the site, as identified in drawing 53B. This must be built to withstand HGV movements. The detailed design and construction details/specification shall be submitted to and approved in writing by the Planning Authority prior to any works being carried out.
8. Prior to commencement of above ground works, a detailed specification, including trade names where appropriate, of all the proposed external materials (including the public realm), except the proposed concrete, shall be submitted to and approved in writing by the Planning Authority before work is commenced on site. Samples of the materials may be required.
9. Prior to commencement of above ground works, full details of the Sustainable Urban Drainage System, including location, design and maintenance of the underground storage tanks, shall be submitted to, and approved in writing by the Planning Authority.

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

**Reasons:-**

1. In order to safeguard visual amenity.
2. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
3. In order to ensure that a high standard of landscaping is achieved, appropriate to the location of the site.
4. To safeguard public safety.
5. In order to safeguard the amenity of neighbouring residents and other occupiers.
6. In order to safeguard the character of the conservation area.
7. In order to safeguard the interests of road safety.
8. In order to enable the planning authority to consider this/these matter/s in detail.
9. In order to enable the planning authority to consider this/these matter/s in detail.
10. In order to safeguard the interests of archaeological heritage.

**Informatives**

It should be noted that:

1. Consent shall not be issued until a suitable legal agreement has been concluded in relation to transport infrastructure:
  - Contribute the sum of £86,666 (based on the proposed 7,625sqm concert hall and existing 1,610sqm office use in Zone 1) to the Edinburgh Tram in line with the approved Tram Line Developer Contributions report.

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. This consent is for planning permission only. Work must not begin until other necessary consents, e.g. listed building consent, have been obtained.
6. The EIA Report has been taken into consideration in the making of this decision, as required under the Environmental Impact Assessment (Scotland) Regulations 2017.
7. Noise from new plant must not exceed NR25 within the nearest noise sensitive receptors, with windows slightly open for ventilation.
8. Music and occupational noise within the venue must not exceed NR15 within the nearest noise sensitive receptors, with windows slightly open for ventilation.
9. Any works affecting an adopted road must be carried out under permit and in accordance with the specifications. See Road Occupation Permits [http://www.edinburgh.gov.uk/downloads/file/1263/apply\\_for\\_permission\\_to\\_create\\_or\\_alter\\_a\\_driveway\\_or\\_other\\_access\\_point](http://www.edinburgh.gov.uk/downloads/file/1263/apply_for_permission_to_create_or_alter_a_driveway_or_other_access_point)
10. The applicant is aware of the potential impact of the proposed servicing arrangement on the Edinburgh Tram and the arrangement for the necessary permits and authority to work. Liaison with Edinburgh Tram will be required (see website <http://edinburghtrams.com/information/atw>).
11. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of a high quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities) and timetables for local public transport.
12. To minimise the level of construction noise to which sensitive receptors will be exposed, the construction work will be conducted in accordance with a Code of Construction Practice (CoCP). It should be noted the local authority has powers under the Control of Pollution Act (1974) to control noise from construction sites.
13. All accesses must be open for use by the public.
14. The archaeological 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.

15. External light fittings on the existing building will require Listed Building Consent
16. Any proposed signage requires advertisement consent and depending on the location, may require Listed Building Consent.
17. All construction works shall be undertaken in accordance with the Construction Management Plan, including a structural assessment of the neighbouring tenement buildings.

## **Financial impact**

---

### **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**

---

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

## **Equalities impact**

---

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

This application was assessed in terms of equalities and human rights. The impacts are identified in section 3.3p) of the Assessment section of the main report.

## **Sustainability impact**

---

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

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

## **Consultation and engagement**

---

### **8.1 Pre-Application Process**

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

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

Neighbours were notified of the planning application on 10 September 2018 and the application was advertised on 14 September 2018, with 21 days allowed for comments. The application also appeared in the Weekly List on 11 September 2018. The EIA Report was advertised on 14 September 2018. Due to an administration and technical error, neighbours were notified of the EIA Report on 24 January 2019 and it was decided to re-advertise the EIA Report on 25 January 2019, with 30 days allowed for comments.

The proposals that formed scheme one received 12 letters of objections, 38 letters of support and one general/neutral comment. This included comments from the following amenity bodies:

- The Cockburn Association
- The Architectural Heritage Society of Scotland
- Edinburgh Access Panel

The New Town and Broughton Community Council were treated as a statutory consultee and provided a neutral representation. This is contained in Appendix 1.

All the interested parties who previously commented on scheme one were re-notified on 27 February 2019, with 14 days allowed for comments. An EIA Report Addendum for scheme two was also submitted and advertised on 1 March 2019, with 30 days allowed for comments. Four representations were received objecting to scheme two, plus an additional objection from a party who hadn't previously commented on scheme one.

All interested parties who previously commented on scheme one and two and all neighbours within 20m of the site boundary were re-notified on 3 September 2021, with 21 days allowed for comments. An EIA Report Addendum for scheme three was also submitted and advertised on 3 September 2021, with 30 days allowed for comments. Nine representations were received; seven in support and two objecting. The New Town and Broughton Community Council provided their full support for the revised scheme, which is contained in Appendix 1.

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

## **Background reading/external references**

---

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

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

**Date registered** 24 August 2018

**Drawing numbers/Scheme** 01,02,03B,05,06A,07B,08B,09B,10B,12B,13B,14B,15B,17B,18A,,  
19A,21B,22B,23B,24B,25B,26B,27B,28B,30B,31B,32B,34B,39B,40B,,  
41A,51B,52B,53B,55B,56B,57A,58B,59B,66A,71A,72B,75B,76A,77B,,  
79B,80B,81B,82A,83B,84B,85B,86B,87B,88A,89B,90A,91B,92B,93B,,  
94B,95B,96A,97A,98B,100B,101B,102B,111A,112-130.,

Scheme 3

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

Contact: Emma Fitzgerald, Senior Planning Officer  
E-mail:emma.fitzgerald@edinburgh.gov.uk

## **Links - Policies**

---

### **Relevant Policies:**

**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.

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

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

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 2 (Co-ordinated Development) establishes a presumption against proposals which might compromise the effect development of adjacent land or the wider area.

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

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 Des 8 (Public Realm and Landscape Design) sets criteria for assessing public realm and landscape design.

LDP Policy Des 11 (Tall Buildings - Skyline and Key Views) sets out criteria for assessing proposals for tall buildings.

LDP Policy Des 12 (Alterations and Extensions) sets criteria for assessing alterations and extensions to existing buildings.

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

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

LDP Policy Env 4 (Listed Buildings - Alterations and Extensions) identifies the circumstances in which alterations and extensions to listed buildings will be permitted.

LDP Policy Env 6 (Conservation Areas - Development) sets out criteria for assessing development in a conservation area.

LDP Policy Env 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 Env 8 (Protection of Important Remains) establishes a presumption against development that would adversely affect the site or setting of Scheduled Ancient Monument or archaeological remains of national importance.

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

LDP Policy Env 12 (Trees) sets out tree protection requirements for new development.

LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

LDP Policy Env 21 (Flood Protection) sets criteria for assessing the impact of development on flood protection.

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

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

LDP Policy Tra 1 (Location of Major Travel Generating Development) supports major development in the City Centre and sets criteria for assessing major travel generating development elsewhere.

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.

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

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



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

# Appendix 1

## **Application for Planning Permission 18/04657/FUL at 35 - 36 St Andrew Square, Edinburgh, EH2 2AD Erection of music and performing arts venue with licensed café/restaurant and bar facilities, and related arrangements for infrastructure, demolitions, and other works. (See Cover Letter for full statutory description) (amended).**

### **Consultations**

---

#### **Economic Development - Revised Scheme response dated 20/09/2021**

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

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

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

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

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

#### *Commentary on existing uses*

*The application relates to a 0.77-hectare site to the east side of St Andrew Square incorporating 36 St Andrew Square (the category 'A' listed Dundas House office*

*building and its annexes: the "south wing" to the south and the "rear block" to the east) along with parking spaces, outbuildings, and the gardens of 35 St Andrew Square.*

*The "rear block" is a three-storey office annexe to Dundas House developed in 1965 for Royal Bank of Scotland staff. The proposed development would entail the demolition of 1,610 sqm of existing office space. The economic impact of this existing space if fully occupied can be estimated. Office lettings in St Andrew Square in recent years have been dominated by the financial services sector with Standard Life Aberdeen, Baillie Gifford, and Computershare all letting large properties. Based on a typical employment density for the financial services sector of one full-time equivalent employee per 10 sqm, a building of this scale could be expected to directly support approximately 161 FTE jobs if fully occupied ( $1,610 \div 10$ ). Based on a mean gross value added per employee for the "financial and insurance services" sector of Edinburgh of £162,697 (2019 prices), this could be expected to directly add £26.2m of GVA per annum (2019 prices) ( $161 \times £162,697$ ) to the economy of Edinburgh if fully occupied.*

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

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

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

#### *Commentary on proposed uses*

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

#### *Class 11 - Assembly and leisure*

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

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

*It is noted that of the 134 jobs expected to be supported by the development, 74 pertain to visitor expenditure and 17 pertain to performer expenditure. These are jobs*

*supported by expenditure in Edinburgh outwith the concert hall by the customers and performers attending the concert hall. These jobs may therefore be seasonal with lower levels of employment at times when patronage of the concert hall is lower rather than steady year-round employment.*

#### *Overall impact*

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

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

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

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

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

prices). Figures provided by the applicant suggest that the proposed development could directly support 23 headcount jobs and £0.8m of GVA per annum.

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

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

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

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

This response is made on behalf of Commercial Development & Investment

## **Scottish Water - Revised Scheme response dated 06/09/2021**

### *Audit of Proposal*

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

### *Water Capacity Assessment*

Scottish Water has carried out a Capacity review and we can confirm the following:

There is currently sufficient capacity in GLENCORSE Water Treatment Works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

### *Waste Water Capacity Assessment*

There is currently sufficient capacity for a foul only connection in the EDINBURGH PFI Waste Water Treatment works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

### *Please Note*

The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has

been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

#### *Asset Impact Assessment*

According to our records, the development proposals impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal to apply for a diversion. The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.

#### *Surface Water*

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

#### *General notes:*

Scottish Water asset plans can be obtained from our appointed asset plan providers:  
Site Investigation Services (UK) Ltd Tel: 0333 123 1223 Email: [sw@sisplan.co.uk](mailto:sw@sisplan.co.uk)  
[www.sisplan.co.uk](http://www.sisplan.co.uk)

Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Customer Connections department at the above address.

If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.

Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed. Please find information on how to submit application to Scottish Water at our Customer Portal.

#### *Next Steps:*

### *All Proposed Developments*

*All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via our Customer Portal prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals. Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.*

### *Non Domestic/Commercial Property:*

*Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at [www.scotlandontap.gov.uk](http://www.scotlandontap.gov.uk)*

### *Trade Effluent Discharge from Non Dom Property:*

*Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.*

*If you are in any doubt as to whether the discharge from your premises is likely to be trade effluent, please contact us on 0800 778 0778 or email [TEQ@scottishwater.co.uk](mailto:TEQ@scottishwater.co.uk) using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found [here](#).*

*Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.*

*For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas, so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.*

*The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at [www.resourceefficientscotland.com](http://www.resourceefficientscotland.com)*

## **Archaeology - Revised Scheme response dated 13/09/2021**

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

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

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

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

#### *Historic Buildings*

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

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

#### *Buried Archaeology*

*The proposals will require significant ground-breaking works, principally in regards proposed demolition of the 20th century buildings on the site and the construction of the new Arts Venue. Such works have the potential to disturb archaeological remains*



*relating to the construction and development of Dundas House. The potential for earlier remains surviving on site is however considered to be low. Nevertheless, it is recommended in addition/alongside the recommended historic building recording, that programme of archaeological work is undertaken during groundbreaking works, in order to record, excavate and analyse any significant remains affected.*

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

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

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

#### **Environmental Protection - Revised Scheme response dated 11/10/2021**

*Environmental Protection has no objection to the application subject to the following conditions:*

1. *Prior to the commencement of construction works on site:*

(a) *A site survey (including intrusive investigation where necessary) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*

(b) *Where necessary, a detailed schedule of any remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.*

*Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.*

2. *The proposed kitchen ventilation system shall be capable of achieving 30 air changes per hour, to ensure that no cooking odour escape or are exhausted into any neighbouring sensitive premises, and positioned as detailed in approved drawing 1485 SK 0179, dated 1 October 2021, all to the satisfaction of the Head of Planning and Building Standards.*

*The proposal seeks to demolish an office block structurally attached to Dundas House, 36 St Andrew Square, and replace this with a performing arts venue, including a 1,000-seat concert hall.*

*Environmental Protection had concerns regarding noise from this proposal affecting nearby sensitive receptors, particularly those at St James Square.*

*A Noise Impact Assessment by Sandy Brown Associates, (ref 20251-R04-B, dated August 2021) has been submitted on behalf of the applicant to address our concerns, demonstrating that the design of the building will meet our expected standards for protecting the amenity of nearby residents in terms of music, operational, and plant noise from the premises. It is acknowledged by Sandy Brown Associates that crowd behaviour is difficult to accurately model. It is also difficult to control via the planning process. However, Sandy Brown Associates have provided predictions of likely crowd movement and noise levels generated by entrance and egress from the venue, demonstrating minimal impact on the amenity of nearby residents.*

*Should all aspects of the design as proposed and commented upon in the Sandy Brown Associates Noise Impact Assessment be implemented, it is unlikely there will be significant impact on the residential amenity of nearby sensitive receptors in relation to noise.*

## **Historic Environment Scotland - Revised Scheme response dated 01/10/2021**

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

### *The proposals*

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

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

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

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

### **Our Advice**

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

#### *Listed building consent*

*18/07127/LBC and 18/07730/LBC*

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

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

#### *Planning application 18/04657/FUL*

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

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

#### *Environmental Impact Assessment*

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

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

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object.*

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

#### *Further Information*

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

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

#### *Annex 1 - Listed building consents*

*Your Council has consulted us in relation to works to two Category A listed buildings, which include the potential impacts on their setting. However, we have concentrated on*

*assessing the physical impact on the listed building in Annex 1, and the setting of the listed building through the planning application process in Annex 2.*

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

*18/07127/LBC - Application for listed building consent for associated proposed works, including demolitions, new boundary treatment and public realm (35 St Andrew Square) Although the removal of the stone wall affects an established relationship between Dundas House and its flanking 'pavilions' we understand the rationale for its removal. We note the sandstone strip paving detail that replaces it and marks out this historic boundary. Any opportunities to salvage and reuse the stone walling (on or off site) would be welcomed.*

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

#### *Demolition*

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

#### *Extension*

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

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

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

*However, due to the urban location and the enclosed and constrained site at the rear of Dundas House, the new music hall does not immediately read as an extension. We consider its major impact would be on the setting of Dundas House. We have therefore assessed this setting in our response to the planning application, with reference to our relevant Managing Change guidance on Setting. (See Annex 2.)*

#### *Alterations*

*Externally, the proposals involve alterations and remedial works to the listed building, mainly towards the rear. Here it is proposed to alter or infill several, now obsolete, openings and tidy up services. We welcome the designs to replicate a recessed blank*

*or dummy window in the architectural/historic openings within the rear façade of Dundas House. In other locations later openings in the walling are to be infilled with flush stonework.*

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

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

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

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

#### *Conclusion*

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

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

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

#### *Annex 2 - Planning Application*

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

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

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

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

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

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

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

#### *Dundas House*

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

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

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

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

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

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

#### *The historic asset*

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

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

#### *Define and analyse the setting*

*We assessed the setting of Dundas House in detail in our response to the previous application. To recap, Dundas House is a distinct architectural composition placed in a*

*set-back position on the square. It has a clearly defined relationship to St Andrew Square, enhanced by its twinned flanking 'pavilions' Dundas House also makes an important contribution to the formal grid plan of the first New Town, as an original (first generation) surviving set-piece development on the east side of St Andrew Square, centred on the principal axis of the first New Town, George Street.*

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

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

#### *Evaluate the impact*

*Our previous comments in January 2019 considered the impact of the development on the setting of Dundas House in a series of views from west to east. In longer views we considered the development would integrate itself as an additional layer of townscape, although there was a more significant impact in closer views, and a significant adverse impact when seen from the eastern side of St Andrew Square.*

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

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

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

#### *Conclusion*

*Our main concern with the previous proposals was the impact caused by the height and scale of the proposed new building on the setting of Dundas House. Much of our*

*pre- application discussions centred on finding solutions to reduce the height and scale of the new development.*

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

#### *The Old and New Towns of Edinburgh WHS*

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

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

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

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

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

#### *Conclusion*

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

#### *Annex 3 - EIA Report*

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

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

#### *Structure and content*

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



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

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

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

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

#### *Methodology*

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

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

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

#### *Assessment*

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

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

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

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

#### **Conclusion**

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

#### **Naure Scot - Revised Scheme response dated 01/10/2021**

*Thank you for your consultation with the above application and EIA.*

*We have no comment to make to this application. This is an urban development which does not raise significant natural heritage issues.*

*It is noted that an updated bat survey has been undertaken. Our protected species advice can be found on our website here: <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species>*

#### **Edinburgh World Heritage - Revised Scheme response dated 01/10/2021**

*Thank you for consulting Edinburgh World Heritage regarding the above application. We offer the following comments, which we hope you find helpful in determining the application. The scope and emphasis of our comments reflects our principal remit associated with impact on the Outstanding Universal Value (OUV) of the Old and New Towns of Edinburgh World Heritage Site ('World Heritage Site').*

#### **E DINBURGH WORLD HERITAGE ADVICE**

*Our previous letter of 12th November 2018 sets out fully our view with respect to the relevant considerations of OUV in this case, the context of surrounding urban development, impact and analysis of the proposals with respect to OUV. Our view at that time was that, on balance of the positive and negative impacts of the proposal on OUV, the overall impact of the proposals was neutral-to-beneficial.*

*In relation to the current consultation, we refer to the OUV analysis, context and key considerations in our earlier letter, which remain robust. With regards impact on OUV, we offer the following comments on the comparative OUV impact of the revised proposals.*

*The revised scheme has been significantly reduced in height and its visual impact on views and receptors of Outstanding Universal Value have resultantly lessened. The negative elements of OUV impact identified within the previous scheme - principally on the prominence and setting of Dundas House, and 23-26 St James Square - have been*

reduced. The work undertaken to reduce these heritage impacts in response to previous comments and context is welcomed. Those elements previously judged to be neutral or positive OUV impacts remain largely as before.

Therefore, on balance of OUV impact, the revised proposals are considered to have a more positive impact than the previous scheme. In line with our previous advice and relevant planning policy and legislation, we have no objection to the proposals.

We note that the civic presence of such an important cultural venue should be supported by the incorporation of Dundas House into the cultural venue in future - subject to sensitive associated interventions required, we would encourage this opportunity for engagement with this fine classical building to be sought moving forward.

We note the importance of material specification and aesthetics for both building and public realm materials, and alongside the expertise within the planning department, we would be happy to provide further input and advice if helpful on this matter.

We hope the above is helpful to you in considering this application.

### **Transport - Revised Scheme response dated 29/09/2021**

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 net sum of £86,666 (based on proposed 7,625m<sup>2</sup> concert hall and existing 1,610m<sup>2</sup> office use in Zone 1) 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 (see Note b)
2. The applicant will be required to upgrade the existing footway on east side of St Andrew Square to a continuous footway/pedestrian priority footway; with dropped kerbs at both vehicular access points designed and built to withstand HGV movements. The design and construction details/specification is subject to the Council's Locality approval
3. Lighting to be provided within the proposed site boundary to ensure safety at night.
4. The applicant is aware of the potential impact of the proposed servicing arrangement on the Edinburgh Tram and the arrangement for the necessary permits and authority to work. Liaison with Edinburgh tram will be required (see website <http://edinburghtrams.com/information/atw>)
5. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;
6. Any works affecting an adopted road must be carried out under permit and in accordance with the specifications. See Road Occupation Permits [http://www.edinburgh.gov.uk/downloads/file/1263/apply\\_for\\_permission\\_to\\_create\\_or\\_alter\\_a\\_driveway\\_or\\_other\\_access\\_point](http://www.edinburgh.gov.uk/downloads/file/1263/apply_for_permission_to_create_or_alter_a_driveway_or_other_access_point);

Notes:

a) The submitted transport statement in support of the planning application for a thousand capacity concert hall generally satisfies the requirement of transport statement. The application site is in the city centre and the applicant has demonstrated that the existing and proposed transport infrastructure improvement will be able to accommodate the impacts of the proposed development. Trips for typical weekday evening performance at the venue fall out of PM peak hour period with arrival and departure 17:45-20:00 and 21:15-22:00 respectively.

The applicant has by Fruin LoS analysis (number of pedestrian/metre/minute) justify that the available footway within the proposed site boundary will be able to accommodate the anticipated 15minute peak hour level of pedestrian flow density at departure time period after a typical weekday event. The resulting value of 900 persons at 15 minute peak of the peak hour departure time period with a footway width 2m wide and clearance 0.6m for the venue was estimated to be 43 persons/m/minute which corresponds to C LoS (Restricted ability to select normal walking speed and freely pass others; high probability of conflict where crossing movements and counter- flows exist; conflict avoidance requires frequent adjustment of walking speed and direction; flows are reasonably fluid, however considerable friction and interaction between pedestrians is likely to occur). The available footway within the proposed site boundary designed as a shared surface varies in width; with some areas more than 2m wide, hence better pedestrian movement than predicted.

The transport statement expected most of the trips to the proposed development to be mainly sustainable transport. The proposed development is within 500m to public transport halt/stops/station (tram, buses and rail). It is within 5 minutes walking distance to the tram halt and bus stops on the major streets of the city centre mainly Princes Street, York Place and St Andrews Square. The site is therefore very well served by public transport.

Three main accesses to the proposed development have been identified namely; Elder Street to the east, St Andrew Square via forecourt of Dundas House to the west; and Register Place to the south. Safe service management strategy through risk assessment will be implemented by the applicant to ensure safe movement of vehicles on public circulation areas (St Andrew Square). Applicant proposes Banksmen during servicing by HGVs to ensure pedestrian safety on affected streets. This is considered a suitable solution due to the frequency of service vehicles as detailed in item j below.

b) Existing 1610m<sup>2</sup> office use tram contribution in Zone 1 = £147,920 proposed 7,625m<sup>2</sup> music hall in Zone 1 = £234,586 Net tram contribution in Zone = £86,666

c) The proposed zero parking is considered acceptable due to the city centre location and public transport availability. It also ensures delivery of a better place. The existing office development has 95 parking spaces. Current Council parking standards could permit up to 42 car parking spaces.

d) It is noted that there is a public car park as part of the St James development, and this would be available for all uses within the wider area.

e) The proposed 20 cycle parking spaces meets the required 20 spaces by the Council's 2020 parking standards (10 secure covered spaces for short stay located adjacent SPEN sub-station and 10 secure covered spaces north west of the proposed development for employee or long stay).

f) Three main pedestrian accesses to the concert hall (footway on Register Lane from the south, St. Andrew Square via horseshoe forecourt of Dundas House from the west and from Elder Street in the east. Existing footway within the site boundary to be upgraded to stone paving and built to full carriageway construction to accommodate a range of service vehicles and footway delineated.

g) Disabled drop-off and pick-up point from St Andrew Square providing direct and level access to the main entrances of the new venue. Access is managed by a controlled vehicular bollard at the entry gate of the forecourt. The bollards are further inside the courtyard to allow disabled car user/service vehicle to wait without blocking St Andrew Square footway.

h) There are 2 disabled bays at the forecourt of Dundas House and on south side of St. Andrew Square.

i) Taxi provision on south side of St. Andrew Square near the proposed development

j) The applicant has demonstrated by swept path analysis to service the proposed concert hall from covered loading bay, located on the northern side of the building, with service vehicles entering and leaving the site using St. Andrew Square. There will be approximately

-4 inbound HGV movements and 4 outbound HGV (7.5 tonnes HGV/box van or 2-axle 10.0m HGV) movements per week

-2 artic lorry per year from St Andrew Square via the forecourt of Dundas House (inbound on forward gear and outbound reversing within the private forecourt and forward gear)

-7 deliveries between 08:00-10:00 per week

-Refuse collection per existing RBS arrangement - 2 per week

k) Emergency vehicle will service the site from Elder St, St Andrew Sq or Register Pl

l) The previous TS explored a number of underground service options namely using the existing underground service infrastructure with additional tunnel, servicing via Edinburgh St James service yard and servicing via Multrees Walk service yard. While these studies provided by means of swept path analysis that vehicular access underground would be feasible none of the potential options proved to be operationally viable due to following:

-Significant cost implication

-Unlimited right of way

-Land acquisition required

-Extensive underground works

-Conflict with other service arrangements

-Operational agreements required with both St Janes, Multrees Walk and Harvey Nichols.

## **New Town + Broughton Community Council - Revised Scheme response dated 18/10/2021**

As I am sure you are aware, the New Town & Broughton Community Council (NTBCC) has previously made representations in support of the original application (Scheme 1) in October 2018 and reiterated that stance in March 2019 following minor amendments made to the proposal (Scheme 2).

NTBCC also took part in the hearing at the Development Management Sub-Committee in April 2019 where again, subject to some concerns regarding impact on residents in

*the neighbouring James Craig Walk tenement building (especially 25), NTBCC were clear in our support for the proposal. In relation to the possible impact on nearby residents as indicated above, we were pleased that several residents from the James Craig Walk tenement were afforded the opportunity to voice their concerns and that they also took the opportunity to make representations at the hearing.*

*Following the commencement of a possible legal challenge to the approved scheme, we have had regular contact with the IMPACT Scotland team and were pleased to host a virtual presentation by them at our September 2021 meeting following the lodging of the current proposal (Scheme 3).*

*Whilst to a degree, we regret the now-proposed reduction in height for the new building which results in an overall reduction in facilities now possible in the new building, we acknowledge that some of the concerns that we raised previously are improved by Scheme 3 (e.g. the resulting increase in separation between the proposed concert hall and the tenement, coupled with the benefits of a reduction in height to those tenements) have been further mitigated by the latest proposal.*

*NTBCC continue to support the principle of developing a world-class purpose-built concert hall / performance venue in this part of the city centre. We also retain our previous view that the facility as envisaged will be a welcome addition to performance spaces across Edinburgh. Given that the current proposals retain many of the aspects included in the previously proposed new concert hall / performance venue, we would also state that it may be helpful to refer to our detailed response to the originally proposed scheme, dated 25 October 2018.*

*We note the recently lodged response by Historic Environment Scotland on the latest proposal.*

*We feel that it may be helpful to offer the following brief comments on key aspects that were raised in the discussion with NTBCC members.*

#### *Accessibility*

##### *1. Accessibility*

*Some concerns were raised initially as to the access of the venue by mobility-impaired visitors due to the level change between Register Place and Elder Street / St Andrew Square leading to Dundas House. Whilst not all possible routes to the main entrance off Register Place are directly accessible, the project team have demonstrated that level access is available to either the venue's main entrance (to the south) or to the secondary entrance (to the east) from nearby disabled parking bays or taxi drop-off points.*

*Internal disabled access within the building itself is served by two lifts to all levels. It was also confirmed that as well as the normal rotating doors, there were wheel chair accessible doors at all entrances.*

*One remaining question was where vehicles carrying people with electric wheel chairs could drop off passengers at a suitable location. The road between the St James Quarter (Elder Street) and the Concert Hall was highlighted but there was a question as to any limitations on the size of vehicles accessing the St James Quarter disabled*

parking bays. We do not have details of wheelchair-accessible concert seating but assume that this has been adequately catered for.

We note that the response from CEC Transport also covers how disabled drop-offs and pick-ups would be managed & we also note that access from St. Andrew Square via the horseshoe forecourt of Dundas House from the west is managed by a controlled vehicular bollard at the entry gate of the forecourt.

The CEC Transport response also covers, in accordance with the Council's LTS Travplan3 policy, that the applicant should consider developing a Travel Plan (including provision of a high-quality map of the neighbourhood (showing cycling, walking and public transport routes). It may be helpful to include the key points as outlined above for disabled visitors to the facility.

#### *Internal/External Lighting of Dunard Centre*

Questions were raised as to the visual impact of the building and surroundings at night time. We note that there is now a further submission covering this which shows a lighting scheme which is sympathetic to both the immediate buildings and the longer views. We acknowledge that the level and intensity of lighting is a balance - on one hand, being necessary to ensure that there is adequate lighting covering the main access ways from Elder Street and from the St Andrew Square tram stop to ensure safety for the users of the venue (which we believe will be the primary accesses for the majority of those using the facility) versus the need to ensure that the longer view night time impact sits comfortably with the surrounding buildings.

That said, as an aside, the longer views may well be impacted more by the new St James Quarter development, including the W Hotel to the rear.

#### *Future proofing the design for potential changes*

Given the removal of the previous street level foyer / circulation space, we were pleased to see that the option of a future entrance through the Dundas House banking hall has been retained. We were also pleased to hear that potential options had been considered regarding possible enhancements to the external space if the current function of Register House changed.

#### *Impact on Local Residents Roof Design*

In response to a question about use of green or blue roofs to capture water it was agreed that this could be considered further in the detailed design steps that would follow.

Although the views from buildings overlooking the roof of the new concert hall are not a key consideration for either residents or the community council, the management of surface water on the now flat roof may benefit from considering the roof design further.

In summary, NTBCC are clear in restating their full support for the principle to develop a world-class purpose-built concert hall / performance venue in this part of the city centre. The facility as envisaged will be a welcome addition to, and complementary to, performance spaces across Edinburgh, offering a mix of classical + other performances in an acoustically-excellent building.

Collectively, we are in full agreement that this new performance venue will add immeasurably to the amenity offered in central Edinburgh + specifically at the east end of the New Town. This will add to and complement the mix of resident / visitor offerings

*in this part of the city centre in addition to the already well-provided for retail, accommodation + food / beverage offerings.*

*We take the view that this project will make a significant and positive contribution to overall residential amenity and act as a further transformative catalyst for the revitalisation of the streets, lanes and businesses that surround it. Although this proposal will provide an acoustically-excellent home for the Scottish Chamber Orchestra, the benefits to the wider community to provide a year-round arts destination for performers, audiences and the wider community should not be under-estimated, despite the reduction in accessible public space within the proposed building.*

*We trust that these final comments will be taken as constructive input to the determination of this application.*

### **SEPA - Revised Scheme response dated 06/09/2021**

*Thank you for the above consultation. I have reviewed the application documents and note that SEPA has previously responded offering no objection to this proposal on three occasions, namely October 2018 (our ref PCS/161218 dated 11 October 2018) , February 2019 (PCS/163459 dated 7 February 2019) and March 2019 (PCS/164127 dated 12 March 2019).*

*I note that a revised EIAR has been submitted, along with FRA and DIA. However I do not consider that these documents raise any additional concerns for us. Please note that for developments, such as this one, where the only source of flood risk appears to be from surface water, we would refer you to our flood risk standing advice. For more general planning matters please refer to our standing advice for development management consultations.*

*I therefore confirm that we have no objection to this planning application.*

*I trust the above is of assistance. Please contact me if you require further information. If you require SEPA comments on some matter not covered by our standing advice please reconsult us, stating clearly the reason for the consultation and how it fits within the triage framework.*

### **Edinburgh Urban Design Panel - 27/09/2017**

#### **1 Recommendations**

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

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



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

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

## *2 Introduction*

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

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

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

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

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

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

## *3 Position, Scale, Massing and Design*

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

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

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

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

3.5 The Panel was concerned that the positioning of the concert hall, studio and public foyer in separate blocks (albeit connected by access links), could result the site appearing fragmented. There is precedent for this in the character of the immediate area but the coherence of the buildings, public realm and links in-between will be critical. Further work is needed to ensure this is delivered. The Panel was also keen to see the site linking logically into adjacent sites.

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

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

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

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

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

## 4 Public Realm

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

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

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

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

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

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

## 5 Permeability

5.1 The Panel was supportive of the aim to increase pedestrian permeability into and through the site. The Panel stated that links should be barrier-free and accessible for all users. The Panel stated that the emphasis should be placed on routes through rather than buildings across.

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

## 6 Use

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

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

## 7 Security

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

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

## **Archaeology - response dated 22/10/2018**

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

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

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

#### *Historic Buildings*

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

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

#### *Buried Archaeology*

*The proposals will require significant ground-breaking works, principally in regards proposed demolition of the 20th century buildings on the site and the construction of the new Arts Venue. Such works have the potential to disturb archaeological remains*

*relating to the construction and development of Dundas House. The potential for earlier remains surviving on site is however considered to be low. Nevertheless, it is recommended in addition/alongside the recommended historic building recording, that programme of archaeological work is undertaken during ground breaking works, in order to record, excavate and analyse any significant remains affected.*

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

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

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

## **Culture Service - response dated 25/02/2019**

### **1. Context**

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

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

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

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

### **2. Cultural Impact**

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

*capital ambitions realised. A new home for the SCO would complete this process and provide a national base for Edinburgh's only national performing company.*

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

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

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

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

*In recent years other cities have extended and improved their infrastructure for live music with major developments to support a range of music genres - Glasgow (City Halls, CCA, Royal Concert Hall expansion), the Sage Centre in Gateshead, London (major investment to South Bank Centre, King's Place, among a plethora of other expanding venues), Bristol (St George's, Colston Hall), the Millennium Centre in Cardiff to name a few. It is interesting to note that concert hall construction across the globe has grown dramatically with most cities investing in world class architecturally landmark venues, whilst Edinburgh has seen no new development for 100 years beyond the refurbishment of the Usher Hall.*

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

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

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

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

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

### **3. Summary**

*The IMPACT Centre proposal is fully endorsed by the Culture Service within the City of Edinburgh Council. It forms an important cultural strand within the ESESCR deal,*

*unlocking £25 million of strategic match funding from all levels of government and has significant financial backing and under-pinning from a private philanthropic donor. It will form an important strategic development in the city's cultural infrastructure - the first major new venue in over a century - and create a vital stimulus for live music, musicians and audiences. It will enhance the year round and festival offer in a landmark architectural venue, attracting new and existing audiences as active participants and consumers and set a new and exciting standard for the next 100 years.*

### **Edinburgh Access Panel - response dated 30/09/2018**

*1- The Panel was pleased to see that in the concert hall a number of wheelchair spaces on most levels was proposed, and that accessible WCs were indicated at those levels.*

*However, seating spaces were all at end-of-row locations. From the drawings it was not possible to see how this was to be achieved, but best practice, which we would hope was the aim, is to allow wheelchair users the opportunity to have companions sit alongside them. This is best achieved by separating the wheelchair positions by two conventional seats, which will give a companion the choice of the best communication aspect with regards to the wheelchair user. We have assumed that the accessible spaces are on a designated platform which will allow some flexibility regarding the relative position of wheelchairs and companion seats.*

*No wheelchair places were indicated on the 4th (top) level. Assuming that these would be the cheapest seats, we would hope that the management would permit wheelchair users to get a discounted ticket for the next lower level, or create spaces on the top level.*

*2- The Panel noted that two accessible parking spaces were available at the front of Dundas House. Given that there are 12 wheelchair spaces available in the concert hall, and ambulatory blue-badge visitors particularly would appreciate a shorter walk from car to lifts, we think that additional designated parking provision would be desirable.*

*3- We were surprised to see no toilet facilities at ground floor (Foyer/Event space level), though one accessible WC is indicated outwith the space at the north end.*

*4- Backstage: The panel believes that it is very important that full facilities are available for disable performers and administrators as well as the audience. We make the following comments -*

*1st floor (green room) level; we'd like to see one of the large WCs changed to and accessible WC, with outward opening door.*

*The Principal's room next to the green room seems to be an accessible WC/shower, and should have an outward opening door.*

*2nd floor level; The allocated accessible WC in the toilet 'suite' should have an outward opening door.*

**THE PANEL WOULD BE HAPPY TO DISCUSS THESE COMMENTS WITH EITHER THE CASE OFFICER AND/OR THE ARCHITECTS.**



## **Environmental Protection - response dated 08/03/2019**

*Environmental Protection has no objection to the application subject to the following conditions:*

*1. Prior to the commencement of construction works on site:*

*(a) A site survey (including intrusive investigation where necessary) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*

*(b) Where necessary, a detailed schedule of any remedial and /or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning.*

*Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.*

*2. The proposed kitchen ventilation system shall be capable of achieving 30 air changes per hour, to ensure that no cooking odour escape or are exhausted into any neighbouring sensitive premises, as detailed in approved drawing 121\_54, dated February 2019, all to the satisfaction of the Head of Planning and Building Standards.*

*The proposal looks to demolish an office block structurally attached to Dundas House, 36 St Andrew Square, and replace this with a performing arts venue, including a 1,000-seat concert hall together with a 200-seat studio.*

*Environmental Protection had concerns regarding noise from this proposal affecting nearby sensitive receptors, particularly those at St James Square.*

*A Noise Impact Assessment by ARUP (ref 255853-60/H04-r1), dated February 2019 has been submitted on behalf of the applicant to address our concerns, demonstrating that the design of the building will meet our expected standards for protecting the amenity of nearby residents in terms of music, operational, and plant noise from the premises.*

*It is acknowledged by ARUP that crowd behaviour is difficult to accurately model. It is also difficult to control via the planning process. However, ARUP have provided predictions of likely crowd movement and noise levels generated by entrance and egress from the venue, demonstrating minimal impact on the amenity of nearby residents.*

*Should all aspects of the design as proposed and commented upon in the ARUP Noise Impact Assessment be implemented, it is unlikely there will be significant impact on the residential amenity of nearby sensitive receptors in relation to noise.*

## **Transport - response dated 18/03/2019**

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 net sum of £200,507 (based on proposed 11,347m<sup>2</sup> concert hall and existing 1610m<sup>2</sup> office use in Zone 1) 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 (see Note b);
2. The applicant will be required to upgrade the existing footway on east side of St Andrew Square to a continuous footway/pedestrian priority footway; with dropped kerbs at both vehicular access points designed and built to withstand HGV movements. The detailed design and construction details/specification is subject to the Council's Locality approval;
3. Lighting to be provided within the proposed site boundary to ensure safety at night.
4. The applicant is aware of the potential impact of the proposed servicing arrangement on the Edinburgh Tram and the arrangement for the necessary permits and authority to work. Liaison with Edinburgh tram will be required (see website <http://edinburghtrams.com/information/atw>)
5. In accordance with the Council's LTS Travplan3 policy, the applicant should consider developing a Travel Plan including provision of a high-quality map of the neighbourhood (showing cycling, walking and public transport routes to key local facilities), timetables for local public transport;
6. Any works affecting an adopted road must be carried out under permit and in accordance with the specifications. See Road Occupation Permits [www.edinburgh.gov.uk/downloads/file/1263/apply\\_for\\_permission\\_to\\_create\\_or\\_alter\\_a\\_driveway\\_or\\_other\\_access\\_point](http://www.edinburgh.gov.uk/downloads/file/1263/apply_for_permission_to_create_or_alter_a_driveway_or_other_access_point);

Notes:

a) The submitted transport statement in support of the planning application for a thousand capacity concert hall generally satisfies the requirement of transport statement. The application site is in the city centre and the applicant has demonstrated that the existing and proposed transport infrastructure improvement will be able to accommodate the impacts of the proposed development. Trips for typical weekday evening performance at the venue fall out of PM peak hour period with arrival and departure 17:45-20:00 and 21:15-22:00 respectively.

The applicant has by Fruin LoS analysis (number of pedestrian/metre/minute) justify that the available footway within the proposed site boundary will be able to accommodate the anticipated 15minute peak hour level of pedestrian flow density at departure time period after a typical weekday event. The resulting value of 850 persons at 15 minute peak of the peak hour departure time period with a footway width 2m wide and clearance 0.6m for the venue was estimated to be 36.4 persons/m/minute which corresponds to C LoS (Restricted ability to select normal walking speed and freely pass others; high probability of conflict where crossing movements and counter-flows exist; conflict avoidance requires frequent adjustment of walking speed and direction; flows are reasonably fluid, however considerable friction and interaction between pedestrians is likely to occur). The available footway within the proposed site boundary designed as a shared surface varies in width; with some areas more than 2m wide; hence better pedestrian movement than predicted.

*The transport statement submitted expected most trips to the proposed development to be mainly sustainable transport. The proposed development is within 500m to public transport halt/stops/station (tram, buses and rail). It is within 5 minutes walking distance to the tram halt and bus stops on the major streets of the city centre mainly Princes Street, York Place and St Andrews Square. The site is therefore very well served by public transport.*

*Three main accesses to the proposed development have been identified namely; Elder Street to the east, St Andrew Square via forecourt of Dundas House to the west; and Register Place to the south. Safe service management strategy through risk assessment will be implemented by the applicant to ensure safe movement of vehicles on public circulation areas (St Andrew Square, Multrees Walk and St James Centre). Applicant proposes Banksmen during service by HGVs to ensure pedestrian safety on affected streets. This is considered a suitable solution due to the frequency of service vehicles as detailed in item g below.*

*b) Existing 1610m<sup>2</sup> office use tram contribution in Zone 1 = £147,920; proposed 11,347m<sup>2</sup> music hall in Zone 1 = £348,427; Net tram contribution in Zone = £200,507*

*c) The existing office development has 95 parking spaces. Current Council parking standards could permit up to 42 car parking spaces. The proposed zero parking is considered acceptable due to the city centre location and public transport availability and delivers a better place.*

*d) It is noted that there is a public car park as part of the St James development and this would be available for all uses with the wider area.*

*e) The proposed 36 cycle parking spaces exceed the required 20 spaces by the Council's 2017 parking standards (12 secure spaces within the building for employees and 24 spaces outside the proposed development for visitors).*

*a) Disabled drop-off and pick-up point from St Andrew Square providing direct and level access to the main entrances of the new venue. Access is managed by a controlled vehicular bollard at the entry gate of the forecourt. The bollards are further inside the courtyard to allow disabled car user/service vehicle to wait without blocking St Andrew Square footway.*

*b) Existing footway within the site boundary to be upgraded to stone paving and built to full carriageway construction to accommodate a range of service vehicles and footway delineated.*

*c) The applicant has demonstrated by swept path analysis to service the proposed concert hall from Elder Street with a service frequency of 2 HGVs per day with occasional service by van. Service frequency of artic lorry is 2 per year and will be undertaken from St Andrew Square via the forecourt of Dundas House (inbound on forward gear and outbound reversing within the private forecourt and forward gear). Refuse collection per existing RBS arrangement 2 per week.*

*d) The applicant explored a number of underground service options namely; using the existing underground service infrastructure with additional tunnel, servicing via Edinburgh St James service yard and servicing via Multrees Walk service yard. While these studies proved by means of swept path analysis, that vehicular access underground would be feasible none of the potential options proved to be operationally viable due to the following;*

- o Significant cost implication*
- o Unlimited right of way*
- o Land acquisition required*

- o Extensive underground works
- o Conflict with other service arrangements
- o Operational agreements required with both St James, Multrees Walk and Harvey Nichols.

### **Flood Planning - response dated 17/10/2018**

*I have reviewed the DIA and FRA provided by Julian for the concert hall development in St Andrew's square. I am satisfied that the contents address CEC requirements therefore we are happy for this to proceed to determination with no further comment from Flood Prevention.*

### **Historic Environment Scotland - response dated 15/01/2019**

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

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

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

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

#### *Our Advice*

##### *Listed building consent*

###### *18/07127/LBC*

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

###### *18/07730/LBC*

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

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

##### *Planning application 18/04657/FUL*

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

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

#### *Environmental Impact Assessment*

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

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

#### *Further Information*

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues in the national interest for our historic environment remit, and therefore we do not object.*

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

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

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

#### *Historic Environment Scotland*

##### *ANNEX 1 Listed building consents*

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

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

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

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

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

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

#### *Demolition*

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

#### *Extension*

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

*Our Managing Change guidance note on Extensions states that extensions should ordinarily be subordinate in both scale and form. In this sense, the proposals would be contrary to the advice offered by this guidance. However, as above, in this instance we consider that the key impact of the proposed development would be on the setting of Dundas House. We have assessed this impact as part of our advice on the planning application, with reference to our relevant Managing Change guidance on Setting. (See Annex 2)*

#### *Alterations*

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

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

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

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

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

#### **Conclusion**

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

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

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

#### **Historic Environment Scotland - response dated 25/01/2019**

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

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

### *Our Advice*

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

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object.*

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

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

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

### **Historic Environment Scotland - response dated 12/03/2019**

*Thank you for your re-consultations which we received on 27 February 2019.*

*Our comments below relate specifically to the design amendments, subject of your re-consultations, and should be taken into account together with our existing main response letter to these applications, dated 15 January 2019. Overall, we are satisfied that the amendments do not raise significant new issues for our interests, and that our position on the proposed development therefore remains the same.*

#### *Listed building consent applications*

##### *18/07127/LBC*

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

##### *18/07730/LBC*

*o We are satisfied that the design revisions for the proposed music venue, including refinement of façade detailing/materials and crown parapet, do not raise new issues for us regarding the overall impact on the category A listed Dundas House. These revisions are mainly set out in the submitted revised Design and Access*



statement, chapter 16. Please also see our comments on the planning application below.

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

### *Planning application*

18/04657/FUL

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

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

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

### *Environmental Impact Assessment*

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

*Planning authorities are expected to treat our comments as a material consideration, and this advice should be taken into account in your decision-making. Our view is that the proposals do not raise historic environment issues of national significance and therefore we do not object.*

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

### *Further Information*

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

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

*Technical advice is available through our Technical Conservation website.*

### **SEPA - response dated 11/10/2018**

*We have no objection to this planning application. Please note the advice provided below.*

*Regulatory advice for the applicant*

1. *Regulatory requirements*

*Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office.*

### **SEPA - response dated 07/02/2019**

*We have no objection to this planning application. Please note the advice provided below.*

*Regulatory advice for the applicant*

1. *Regulatory requirements*

*Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office.*

### **SEPA - response dated 12/03/2019**

*We have no objection to this planning application. Please note the advice provided below.*

*Regulatory advice for the applicant*

1. *Regulatory requirements*

*Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office.*

### **New Town and Broughton Community Council - response dated 25/10/2018**

*We are very grateful for the extension proposed for the New Town & Broughton Community Council to allow NTBCC to reflect the views of the community council and wider community to this important application.*

*We would want to firstly acknowledge the level of engagement extended by members of the development team with community council members and other local residents during the extended consultation process. Broadly, we expressed support for the approach taken during this consultation of initially setting the context of the proposal and exploring the wider public's thoughts on the key aspects that were important to them, and then using the feedback obtained to develop more specific design details covering the style, footprint, massing and height of the new building. We would, however, note that the initial Design Brief as set by the IMPACT team to achieve their goals has resulted in a significant challenge as to the facilities to be accommodated on this constrained site; requiring both an innovative approach to be taken as well as some compromise to the wider setting including the proximity to the residential tenement to the east. NTBCC would have preferred a slightly less tall main auditorium but we fully understand that is not possible with the proposed brief, and the "normal" option of reducing a residential or office building by one storey is not feasible.*

*The approach taken by the architects is innovative and achieves high levels of permeability for pedestrians through and/or around the building providing a real enhancement to this area.*

*Several members of the NTBCC attended the various Public Consultations (either at the Preview session or the later public sessions). Although some NTBCC members had already completed a Questionnaire - expressing their personal views on what they saw - we agreed to provide a broader consensus of views from within the community as far as we are able to gauge at this time. Hence, we responded to the Pre-Application consultation (17/04797/PAN) summarising our collective thoughts in November 2017 ; which we were happy to see included in the Pre-Application Consultation report lodged with the above application.*

*Furthermore, NTBCC were appreciative of the presentation by David Chipperfield Architects and others from the IMPACT team on the near-final proposals at the NTBCC meeting in June 2018.*

*We fully acknowledge and welcome the significant efforts of the developers to consult with a wide variety of stakeholders, including importantly residents, throughout the development of the final design for this project. We were also encouraged by the fact that the detailed presentation boards used at these consultations was available on the [ImpactScotland.org.uk](http://ImpactScotland.org.uk) website. We would further note that the design evolution has reflected many of the comments generated by this extensive consultation.*

*We also welcomed the early engagement with the Edinburgh Urban Design Panel and note their conclusions.*

*1. Support for a new international music and performance venue in central Edinburgh  
NTBCC are clear in stating their full support for the principle to develop a world-class purpose-built concert hall / performance venue in this part of the city centre. The facility as envisaged will be a welcome addition to performance spaces across Edinburgh, offering a mix of classical & other performances in an acoustically-excellent building.*

*Collectively, we are in full agreement that this new performance venue will add immeasurably to the amenity offered in central Edinburgh & specifically at the east end of the New Town. This would add to and complement the mix of resident / visitor*

*offerings in this part of the city centre in addition to the already well-provided for retail, accommodation & food / beverage offerings.*

*We take the view that this project will make a significant and positive contribution to overall residential amenity and act as a transformative catalyst for the revitalisation of the streets, lanes and businesses that surround it.*

*Although this proposal will provide "an acoustically-excellent home for the Scottish Chamber Orchestra", the benefits to the wider community to provide a "year-round bustling arts destination for performers, audiences and the wider community" should not be underestimated. We are also supportive of the applicant's desire to develop partnerships, creative programming and community outreach to engage and encourage participation of people regardless of age or background.*

*NTBCC also note, acknowledge and support the aim of IMPACT Scotland that the range of activities need to be consistent with longer term economic sustainability - despite the substantial public contribution being given in support of the capital costs (through the Edinburgh City deal).*

## *2. Location for the IMPACT Centre building*

*St Andrew Square is an excellent location for this new performance venue both in terms of complementing the mix of resident / visitor offerings in this part of the city centre as well as the transport infrastructure (bus, tram and train) as well as motor vehicles given the proximity to the new Edinburgh St James development. It is also well-positioned regarding pedestrian flows through this part of the city centre.*

## *3. Permeability and Relationship to Other Currently Consented Developments*

*The proposed design provides a welcome inter-connection with neighbouring developments and improves the permeability between St James Square, Elder Street and West Register Street, Register Place and St Andrews Square*

*We support this opening of access through the site, and with the design of the ground floor, we understand that this open access will be available for extended hours irrespective of the operation of the concert hall.*

## *3. Connectivity*

*We acknowledge the considerable connectivity of this site with Edinburgh's public transport network. However, given that it is likely that many concert attendees (at least in the short/medium term) will still travel by private car and will be tempted to park in nearby residential areas of the New Town - putting further pressure on these parking zones which already suffer due to the imbalance between available residential parking spaces versus. Allocated Residential parking permits. We therefore support the suggestion from The Cockburn Association who advocate some relationship with the operators of the new car park associated with the Edinburgh St James development be agreed, with perhaps concessionary ticketing for evening performances (when the car park is less likely to be used). Similarly, the integration of concert and public transport ticketing would be advantageous (i.e. buying a bus or tram ticket as part of the same purchase).*

*We acknowledge that this may be an operational matter and outwith the scope of planning conditions but given the concerns raised by residents in the New Town who may be impacted, we felt it necessary to register this issue.*

*4. Impact on Setting of Adjacent Buildings NTBCC support the principle of designing the new facility from "inside to out" i.e. ensuring that the building functions as an acoustically-excellent space but that does dictate to a degree the height and massing necessary to achieve this.*

*Accepting this, the key design element is to ensure that the new building complements the adjacent listed buildings and does not unduly detract from them or dominate them. We do, however, recognise that there is a desire to ensure that the new building has an individual presence on the site and to a degree, does stand out but this need not nor should not be a priority. The relationship between the new build and Dundas House in particular is key to a successful design that would be embraced by the local community. We recognise that the new building will be visible from many viewpoints within Edinburgh city centre and beyond, but we believe that the key viewpoint is that from George Street / St Andrews Square.*

*Although we understand that concerns have been raised by others, we do not believe that a major consideration should be whether the new building detracts from the new hotel and other adjacent buildings in the new Edinburgh St James development. From the residents' standpoint, it is the views from George Street / St Andrew Square that are of paramount importance rather than the views of hotel residents from the top of the "W" hotel.*

*There are differing views as to the benefits of the "W" hotel as a suitable backdrop / framing for Dundas House versus that of the more symmetrical and geometric proposed IMPACT development. On balance, NTBCC believe that whilst accepting that the IMPACT development cannot be described a subservient to the existing Dundas House, it does offer a different perhaps grander view from the George Street axis. Further, the oval domed roof of the proposed development is perhaps more fitting and consistent with the domed roof of Dundas House and could be seen as more beneficial in views from further afield, albeit with a denser development than the current view.*

*The key to ensuring harmony with the existing buildings is the choice of materials for the new development.*

*Finally, whilst acknowledging that within the constraints of the available site, the proposed concert hall is an effective and positive use of space, in terms of positioning of the new development within this constrained site, we take the view that locating the new building close to (or abutting) the rear of Dundas House (once the later extensions has been removed) has the benefit of both ensuring that there is maximum spacing between any new development and the existing tenements (both residential & commercial) to the east of the site as well as allowing in the longer term, consideration for a more fitting permanent access route through the current RBS building, which we believe would be advantageous in the longer term and therefore we support the proposal to retain that option with the proposed building design.*

## *5. Materials*

*We understand that although the Design & Access Statement covers the approach to be taken in terms of choice of materials, the exact choice of final surface finishes (for both the main elliptical concert hall and the orthogonal support (annex) buildings) has still to be made. NTBCC share the Cockburn's view that it would be appropriate to make some acknowledgement to the stone context of the building's setting. We also share and support the proposal by the Cockburn to ensure that sample panels (of whatever is proposed) be made available on site before any final decision is taken.*

*We have separately had various discussions with the architect on proposed materials and whilst normally being an advocate of sandstone for important developments within the New Town & especially when positioned close to existing listed buildings, we can appreciate the advantage of using reconstituted stone within parts of this development from the standpoint of being able to ensure consistency and also enable finer detailing of some of the building elements. We are also of the view that the use of polished reconstituted stone (formed from an amalgam of materials / colours from buildings adjacent to it) in certain areas could rest sympathetically with the buildings that surround the development site - including the limestone facades of the Edinburgh St James development. The key however is the quality of the final finish and the attention to detail given to it.*

*As we understand it, the elliptical concert hall building itself is shown to have a distinctive façade different from the adjoining orthogonal (annex) blocks. If our understanding is correct, this approach, including choice of materials could help to visually reduce the overall mass of the building and furthermore create additional visual interest.*

*It is worth noting that as far as we are aware, the roof of the annex blocks has still to be finalised. Given that these will potentially be visible from a number of viewpoints, this aspect of the detailed design should also be fully considered. We would support further community consultation on the final detailing of the project if possible through a further AMC application if necessary.*

*Overall, whilst expressing a preference, we would defer the final choice of materials to CEC Planning Dept., perhaps after further consultation with Historic Environment Scotland.*

#### **6. Impact on Local Residents**

*NTBCC would want to stress the importance of giving due regard to the small "enclave" of local residents immediately to the east of the proposed development. Whilst we are aware that they already have communicated their concerns directly, we believe that these concerns should be considered fully with respect to the relevant LDP policies.*

*It is one of Edinburgh city centre's main attractions that it still has a residential presence in its heart which in our view, should be preserved. Furthermore, those residents have already been subject to many disturbances and changes and this will continue for some years.*

*We note that the application includes a comprehensive daylight / sunlight study on the adjacent buildings (Design & Access Statement Appendix C) by Thornton Tomassetti, and we would especially refer to those sections covering "Building No. 1" & "Building No. 2" as defined in the report.*

*Whilst not having expertise in this area, NTBCC notes that this assessment would appear to show that there are multiple windows that do not pass the initial assessment regarding adequate daylighting and are therefore (based on existing LDP policies) required to undergo a further VSC analysis. The VSC analysis which we understand has been carried out in line with CEC policies then indicates that several windows still do not meet the required standards, and are then analysed further under the "Average Daylight Factor Analysis".*

*This would then appear to conclude with the statement "Room does not meet acceptable daylight target in the existing condition. No further analysis required."*

*We would request that the Planning officer ensures that this analysis regarding the impact on residential properties has been carried out in accordance with the current LDP policies.*

### *7. Connectivity*

*We share the view of the Cockburn Association that it is essential that the floorscape around the new Concert hall be integrated with the Registers and wider environment. This should respect the limited palette of paving materials in the New Town and be designed so that the pedestrian environment appears seamless to users who will approach the building from the various access points. Linkages to the new Edinburgh St James development should ideally also follow this approach. We would support efforts to regarding access to the several garden areas currently under the auspices of the Registers of Scotland (RoS) - (although we appreciate that there seems some reluctance from RoS to engage currently. There is an opportunity to create a new, interesting and intimate pedestrian quarter, in which the new concert hall forms the centre-point. It is also key that the proposed building connects seamlessly with the new developments that surround it.*

*As we have previously stated, we are somewhat surprised and disappointed) by the current thoughts regarding integration of the new concert hall development with the existing bank branch in 36 St Andrews Square. We would support (perhaps in the longer term) that a single main entrance to the new concert hall is defined and as we would expect the majority of those attending events at the new concert hall would be arriving from the west - either the St Andrews Square tram-stop, bus station or by pedestrian routes from Waverley station or the eastern end of George Street across St Andrews Square, that this would be preferable through 36 St Andrew Square.*

### *8. Access for servicing*

*We have discussed the potential issue of ensuring adequate servicing for the facility during the various conversations with the architects. Our strong preference would be to ensure that there is sufficient hard-standing at the rear of the new building to allow for waste removal / deliveries etc. but more importantly, adequate access for delivery vans (in support of the resident orchestra and others) with access from the extension of Elder Street to the square in the new Edinburgh St James development. This should be feasible as we are aware that there is already limited planned access at this location for hotel guests to the new "W" hotel. Although this should be a predominantly pedestrian area, we would hope that arrangements could be agreed (and with the necessary permissions) to provide access to the new concert hall by this route. The alternate of providing access from St Andrews Square could be detrimental to and*

*interact negatively with the pedestrian flow from St Andrews Square; servicing should be located away from the main entrance to the building.*

*We would again express the appreciation of NTBCC members that you have accepted a late representation on the above application.*

*In summary, whilst we are fully supportive in principle with much of the application as stated above, given the concerns on the potential impact of the proposed development on the local residents that live directly adjacent, we would maintain a "neutral" stance on this application.*

*We trust that this representation will be taken as constructive input to the determination of this application.*

### **New Town + Broughton CC - response dated 30/03/2019**

*Although the New Town & Broughton Community Council intended to provide further comments covering the various revisions submitted in February 2019, given the tight schedule for determination of this application and the forthcoming Development Management Sub-Committee (DMC) Hearing scheduled on April 24th ; we have re-visited our initial representation and believe that all material comments were satisfactorily reflected in that document.*

*We would again express our thanks both to the City of Edinburgh Council for holding a session covering the key changes in the February 2019 revision and also to the continuing level of engagement extended by members of the development team with community council members and the very helpful consultations, including that at the recent DMC site visit.*

*NTBCC continue to support the principle of developing a world-class purpose-built concert hall / performance venue in this part of the city centre. The facility as envisaged will be a welcome addition to performance spaces across Edinburgh.*

*However, we would offer the following brief comments on key aspects.*

#### **1. Materials**

*We appreciated having sight of the 2 large test panels and broadly welcome the approach to delineate the 3 'layers' of the proposed building by changes to the surface treatment (in line with the comment we expressed previously). We are also retain our view that the use of reconstituted / composite stone (a "terrazzo" formed from an amalgam of materials / colours from buildings adjacent) could rest sympathetically with the buildings that surround the development site. However, we were not fully convinced that the sample panels as*

*available represent the most sympathetic final colour palette / composition. We believe that there is a balance between creating a harmonious inter-relation between the proposed new build and the listed buildings surrounding the site vs. the desire to provide the new concert hall building with a distinctive presence; with the need for the building to sit harmoniously within the wider site taking precedence.*



*We would therefore suggest that, given its prominent location within the World Heritage site, further consideration be given to the final palette of the facades; perhaps through a planning condition.*

*Ultimately, however (as expressed previously) , we would defer the final choice of materials to CEC Planning Dept., perhaps after further consultation with Historic Environment Scotland.*

## *2. Impact on Local Residents*

*NTBCC would again want to stress the importance of giving due regard to the small "enclave" of local residents immediately to the east of the proposed development. Whilst we are aware that they already have communicated their concerns directly, we believe that these concerns should be considered fully with respect to the relevant LDP policies.*

*We welcome the comprehensive update to the Thornton Tomasetti Daylight analysis which provides more detail and clarity on the impact of this proposal on the adjacent residential building to the east. As commented previously, NTBCC do not have expertise in this area ; NTBCC notes that this updated assessment would appear to show that there are multiple windows that are compromised in terms of daylight by the proposed building.*

*We are also aware (& welcome ) that residents from the James Craig Walk / St James Square tenement building have had the opportunity to make specific comments on the updated assessment and we also understand that they will be granted an opportunity to present their concerns at the forthcoming DMC Hearing.*

*We would hope that the determination process and the draft report to be put before the DMC will ensure that the analysis regarding the impact on residential properties has been carried out in accordance with the current LDP policies and other Council guidance.*

*We trust that these brief final comments will be taken as constructive input to the determination of this application.*

## **Police Scotland - response dated 19/10/2018**

*I write on behalf of Police Scotland regarding the above planning application.*

*We would welcome the opportunity for one of our Police Architectural Liaison Officers to meet with the architect to discuss Secured by Design principles and crime prevention through environmental design in relation to this development. And our Counter Terrorism team would also wish to have input regards wider public safety.*

*Please contact me at your earliest convenience to enable us to progress this project.*

## **Scottish Water - response dated 19/09/2018**

*Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:*

*Water*

*o There is currently sufficient capacity in the Glencorse Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.*

*Foul*

*o There is currently sufficient capacity in the Edinburgh PFI Waste Water Treatment Works. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.*

*The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly*

*Infrastructure within boundary*

*According to our records, the development proposals impact on existing Scottish Water assets*

*The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team directly.*

*The applicant should be aware that any conflict with assets identified may be subject to restrictions on proximity of construction.*

*Surface Water*

*For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not normally accept any surface water connections into our combined sewer system.*

*There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.*

*In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.*

*General notes:*

*o Scottish Water asset plans can be obtained from our appointed asset plan providers:*

*Site Investigation Services (UK) Ltd.*

*o Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.*

- o *If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.*
- o *Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.*
- o *The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.*
- o *Please find all of our application forms on our website.*

*Next Steps:*

- o *Single Property/Less than 10 dwellings*

*For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a PreDevelopment Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.*

- o *10 or more domestic dwellings:*

*For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.*

*Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.*

- o *Non Domestic/Commercial Property:*

*Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at [www.scotlandontap.gov.uk](http://www.scotlandontap.gov.uk)*

- o *Trade Effluent Discharge from Non Dom Property:*

*Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.*

*If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email [TEQ@scottishwater.co.uk](mailto:TEQ@scottishwater.co.uk) using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found online. Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.*

*For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.*

*The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer.*

### **Scottish Water - response dated 29/01/2019**

*Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:*

#### *Water*

*o This proposed development will be fed from Glencorse Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a PreDevelopment Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website.*

#### *Foul*

*o This proposed development will be serviced by Edinburgh PFI Waste Water Treatment Works. Unfortunately, Scottish Water is unable to confirm capacity at this time so to allow us to fully appraise the proposals we suggest that the applicant completes a Pre-Development Enquiry (PDE) Form and submits it directly to Scottish Water. The applicant can download a copy of our PDE Application Form, and other useful guides, from Scottish Water's website.*

*The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.*

#### *Drinking Water Protected Areas*

*A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.*

#### *Surface Water*

*For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not normally accept any surface water connections into our combined sewer system.*

*There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.*

*In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.*

*General notes:*

*o Scottish Water asset plans can be obtained from our appointed asset plan providers:*

*Site Investigation Services (UK) Ltd*

*Tel: 0333 123 1223 Email: [sw@sisplan.co.uk](mailto:sw@sisplan.co.uk) [www.sisplan.co.uk](http://www.sisplan.co.uk)*

*o Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area then they should write to the Customer Connections department at the above address.*

*o If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.*

*o Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.*

*o The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.*

*o Please find all of our application forms on our website.*

*Next Steps:*

*o Single Property/Less than 10 dwellings*

*For developments of less than 10 domestic dwellings (or non-domestic equivalent) we will require a formal technical application to be submitted directly to Scottish Water or via the chosen Licensed Provider if non domestic, once full planning permission has been granted. Please note in some instances we will require a PreDevelopment Enquiry Form to be submitted (for example rural location which are deemed to have a significant impact on our infrastructure) however we will make you aware of this if required.*

*o 10 or more domestic dwellings:*

*For developments of 10 or more domestic dwellings (or non-domestic equivalent) we require a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.*

*Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which*

Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

o *Non Domestic/Commercial Property:*

*Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened up to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at [www.scotlandontap.gov.uk](http://www.scotlandontap.gov.uk)*

o *Trade Effluent Discharge from Non Dom Property:*

*Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.*

*If you are in any doubt as to whether or not the discharge from your premises is likely to be considered to be trade effluent, please contact us on 0800 778 0778 or email [TEQ@scottishwater.co.uk](mailto:TEQ@scottishwater.co.uk) using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found online. Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.*

*For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas so the development complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.*

*The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer.*

### **Scottish Natural Heritage - response dated 03/10/2018**

*Thank you for your consultation of 13 September 2018 regarding the application and EIA for the above proposed development.*

*This application is not envisaged to raise many natural heritage issues. Ecology was scoped out of the EIA and the undertaking of a Townscape and Visual Impact Assessment (TVIA), to reflect the urban nature of this proposal, was noted.*

*TVIA*

*We note the changes to views as shown in the range of visualisations accompanying this application. These changes relate largely to the urban townscape and/or cultural context. From a natural heritage point of view, we have no comments to make on this proposal.*

## **Scottish Natural Heritage - response dated 28/01/2019**

*Thank you for your consultation of 24 January 2019 regarding the application and EIA for the above proposed development.*

*This application is not envisaged to raise many natural heritage issues. Ecology was scoped out of the EIA and the undertaking of a Townscape and Visual Impact Assessment (TVIA), to reflect the urban nature of this proposal, was noted.*

### **TVIA**

*We note the changes to views as shown in the range of visualisations accompanying this application. These changes relate largely to the urban townscape and/or cultural context. From a natural heritage point of view, we have no comments to make on this proposal.*

## **Scottish Natural Heritage - response dated 19/03/2019**

*Thank you for your consultation of 27 February 2019 with the EIA revisions for the above proposal.*

*We have no additional comments to make on this proposal.*

## **Economic Development - response dated 12/03/2019**

### **Commentary on existing use**

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

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

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

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

### **Commentary on proposed uses**

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

#### *Class 11 - Assembly and leisure*

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

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

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

#### *Overall impact*

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

#### *Overall impact*

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

*There are three principal existing dedicated concert halls in Edinburgh city centre - the Usher Hall (capacity 2,200), Queen's Hall (900), and Reid Concert Hall (218) - along with multiple smaller music venues. There are also multiple other venues in the city centre that host music performances, including the Playhouse (3,059); King's Theatre (1,350); Festival Theatre (1,915); Assembly Rooms Music Hall (788); Royal Lyceum Theatre (658); and St Andrew's and St George's West (200). While it is recognised that there will be differences in the specifications of each venue determining what performances each can host, it is assumed that there will be some degree of crossover in terms of the market for each. From a cursory analysis of event calendars, it does not appear that all of the aforementioned venues are being fully utilised. It is noted that the Scottish Chamber Orchestra currently performs in the Queen's Hall and it is proposed to relocate these performances to the new concert hall, suggesting any economic*



*activity associated with the Scottish Chamber Orchestra will be displaced from the Queen's Hall. In the absence of any detailed analysis evidencing a current shortage of musical venues in Edinburgh city centre it is considered prudent to assume that there will be significant displacement of economic activity from elsewhere. This conclusion is borne out by the applicant's contextual report which describes the Queen's Hall as "a converted former church building with many limitations for both performers and audiences" and highlights the perceived low quality of existing venues, suggesting that the new concert hall is intended to be a higher quality replacement for the existing venues. The Council's Culture service has assessed the proposals and acknowledged that "that there will be an issue around displacement of activity with the IMPACT Centre [which] will divert some performance activity away from venues such as the Usher Hall and Queen's Hall". However, the Culture service has announced plans to create a working group to "ensure a balanced and co-ordinated diary of events is planned and marketed for the city" and concludes that the IMPACT Centre "has the potential to offer a net gain to the city for artistic performance and audience attendance."*

#### *Other considerations*

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

#### **SUMMARY RESPONSE TO CONSULTATION**

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

*This response is made on behalf of Economic Development.*

#### **Edinburgh World Heritage - response dated 12/11/2018**

*Thank you for consulting EWH on the potential impacts of these proposals on the Outstanding Universal Value of the World Heritage Site. It is a complex assessment due to a range of factors, principally the location of the site, the level of change in the area since the inscription of the World Heritage Site, and the proposed uses of the new building.*

*We are grateful to the IMPACT Scotland Team for engaging with us, and the concepts of World Heritage and Outstanding Universal Value, fully and frankly during the consultation process. This, and the quality of materials included within the planning application have greatly assisted in understanding potential impacts.*

*We acknowledge at the outset that the provision of a new public building in the form a 1000 seat concert venue with the very finest acoustics in a city of the size of Edinburgh is a rare occurrence.*

*It must be noted that this is an extremely unusual situation, due to the substantial and ongoing changes in the area around the site of the proposed development - we are in effect attempting to judge impact against a future that is as yet unbuilt.*

#### *Outstanding Universal Value and Attributes of the World Heritage Site*

*The local plan policy against which we test major development proposals is ENV 1, which states that:*

*'Development which would harm the qualities which justified the inscription of the Old and New Towns of Edinburgh and the Forth Bridge as World Heritage Sites or would have a detrimental impact on a Site's setting will not be permitted'.*

*The application documents demonstrate a good understanding of the World Heritage Site and the relevant aspects of Outstanding Universal Value, identifying four key attributes relevant to the application (abbreviated here):*

- The eastern view along George Street and the principle axis and primary street of the first New Town*
- The formality and planned discipline of the New Town Plan*
- Dundas House - and a group of three of the earliest townhouses*
- The position of Edinburgh within the Scottish, UK and International arts scene*

*These broadly fit a range of attributes identified in the nomination document, advisory body evaluation, statement of Outstanding Universal Value and the brief synthesis, which we identify as follows (emphasis added). These points are from the nomination document unless otherwise stated:*

- Dramatic topography combined with the planned alignments of key buildings in both the Old and New Town, results in spectacular views and panoramas and an iconic skyline*
- First New Town - clarity of urban structure, particularly the axis of George Street (designed for 'an axial public monument as its focus')*
- Some of the finest public and commercial monuments of the neo classical revival (The Advisory Body Evaluation notes 'The New Town is noteworthy for its planned ensembles rather than individual building. However, there is a number of notable public buildings')*
- Classical set pieces - Dundas House and its setting*
- Contrast - Layout, buildings, open spaces and views, that demonstrate the distinctiveness between the organic growth of the Old Town and the planned terraced and squares of the New Town*
- Culture: Nomination: Edinburgh represents the essence of cultural traditions of Scotland as a European city, and Edinburgh is tangibly associated with events - being the host of the world's largest number of annual cultural festivals and with living traditions*
- Edinburgh is a built embodiment of the evolution of Scottish society and settlements, indicating how they have adapted and changed over time, to take advantage of the physical constraints and opportunities..... Edinburgh is pre-eminently an associative cultural landscape enjoying powerful resonances of religious, artistic and cultural history of an international significance*

- *Philanthropy - the nomination document notes that Edinburgh 'with a fiercely proud municipal authority together with a number of influential charitable trusts and public boards was determined to see the Capital adorned with fine architecture'*
- *'Retains its historic role as the administrative and cultural capital of Scotland' (Advisory Body Evaluation)*

*There are a number of other individual receptors that contribute to Outstanding Universal Value nearby:*

- *Dundas House (noted as 'The finest free-standing house in the New Town' in the nomination gazeteer)*
- *23-26 St James Square*
- *Melville Monument*
- *Register House*

*An area of significant change since inscription*

*The site of the proposed concert hall development sits between the St James site and the eastern end of the First New Town.*

*It is normal practice to judge the impact of proposals on Outstanding Universal Value as defined at the point of inscription on the World Heritage list - in Edinburgh's case 1995 - and this is supported by local plan policy ENV 1.*

*In this instance, at the suggestion of the advisory body to the World Heritage Committee, the initial proposal for the World Heritage site was expanded to include the St James Centre, with a view to securing change beneficial to Outstanding Universal Value. Consequently it was accepted at the point of inscription that the 1995 baseline was, in this particular area, going to change.*

*These changes are ongoing - the St James Centre has been demolished and preparations are underway for the construction of its replacement.*

*On being presented with late-in-the-day changes to parts of the St James Centre replacement plan, the view of City of Edinburgh Council officers and EWH was the upper floors (9-12+) of the proposed hotel element would be damaging to Outstanding Universal Value. These concerns are recorded in planning correspondence and the hearing on the hotel element. Nonetheless, these proposals were passed.*

*This therefore set a new (and in our view, less desirable) baseline from which to manage Outstanding Universal Value in this area: the World Heritage Nomination Document notes that the St James Centre was largely hidden from view from the New Towns, whereas the consented scheme is highly visible, and especially dominant in views along the principle axis of the First New Town.*

*There have been other significant changes in the area since 1995, including the construction of the bus station, Harvey Nichols, the Standard Life building on the south of the square, the Registers development, the addition of tram infrastructure and the reimagination of the square itself.*

*Impacts of the proposals on Outstanding Universal Value*

*We acknowledge that the development team has substantially altered the proposals during the pre-application consultation process with a view to taking into account*

*potential impacts on Outstanding Universal Value, including a significant reduction in height. It remains the case that the proposals are for a large building in a sensitive location.*

*This sensitivity is largely limited to the view along George Street, the principle axis of the First New Town, and St Andrew Square, and close up to the proposals around Dundas House, the rear of the Registers complex, and the remaining St James Square tenement.*

*In other long views, the main body of the building sits within the 'shoulder' of the city, created by surrounding buildings. This is supported by design that complements the surrounding classical buildings. In some instances the crown/dome element stands proud (it is a similar height to the neighbouring consented Register Lanes development). The general characteristic of higher buildings in the World Heritage Site is that their upper floors are unoccupied.*

*EWH's view of the impacts of the proposals on Outstanding Universal Value is summarised below. A more extensive explanation of these can be found at the end of this letter.*

*We judge there to be a negative impact on one attribute and two receptors, these being*

- The classical set piece around Dundas House*
- Dundas House as the finest free-standing house in the New Town*
- 23-26 St James Square*

*We judge there to be a neutral impact on three attributes and two receptors, these being*

- Planned alignments of key buildings*
- The city's skyline*
- The layout of the New Town*
- The Melville Monument*
- Register House*

*We judge there to be positive impact on six receptors. We note that four of these are intangible.*

- Clarity of urban structure*
- Public buildings*
- Culture*
- Edinburgh as the embodiment and evolution of Scottish society and settlements*
- Philanthropy*
- Edinburgh's historic role as administrative and cultural capital of Scotland*

### *Conclusions*

*The majority of planning applications we engage with through the planning protocol with the City of Edinburgh Council primarily touch on the physical aspects of Outstanding Universal Value, and less so the intangible cultural aspects that are identified in the World Heritage Site nomination and associated documents. This reflects their private, commercial rather than cultural, public nature.*

*In this instance the balance is between negative impact on one attribute and two individual receptors, and positive impact on a range of attributes, including intangible*

elements. It is hard to accurately ascribe weight to the wider cultural impact, although this forms an important part of Outstanding Universal Value.

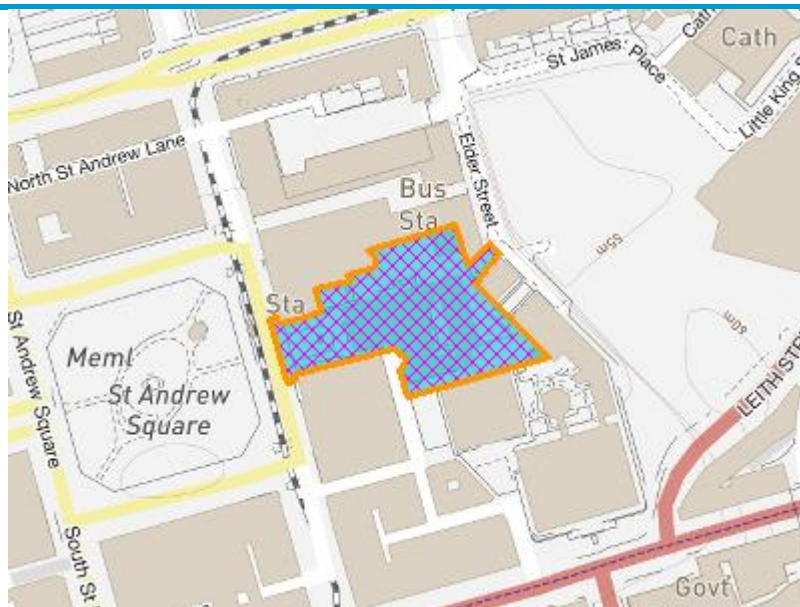
It is our view that the benefits of the proposals, in terms of Outstanding Universal Value, at the very least, balance out any harm, giving a neutral impact and depending on the weight given to the wider cultural impact, may be viewed to be beneficial.

### **Edinburgh World Heritage - response dated 29/03/2019**

Thank you for consulting EWH on the changes to the proposals.  
I write to confirm that these results in no way change our overall position, as expressed in our letter of 12/11/2018.

### **Location Plan**

---



© Crown Copyright and database right 2014. All rights reserved. Ordnance Survey License number 100023420  
**END**