

# Development Management Sub Committee

**Wednesday 24 November 2021**

## **Application for Listed Building Consent 18/07730/LBC at 35 - 36 St Andrew Square, Edinburgh, EH2 2AD. Proposed demolitions, alterations, remodelling and erection of extension to the listed building.**

**Item number**

**Report number**

**Wards**

B11 - City Centre

### **Summary**

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With reference to Section 14 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, the proposals will not diminish the special interest of Dundas House through the interventions proposed to its interiors or external building fabric. However, the proposed extension does not fully comply with the HES Managing Change guidance on 'Extensions' by virtue of its insubordinate scale failing to respect the architectural integrity, composition and setting of the listed building. The proposed design seeks to mitigate these negative impacts 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 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.

In the event that the Development Management Sub-Committee does not agree with this assessment and concludes that the negative presumption is engaged, consideration was given to paragraph 15 of Historic Environment Scotland's 'Interim Guidance on the Principles of Listed Building Consent' 2019 (GPLBC) to assess whether the presumption can be rebutted.

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

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, it does not result in significant harm to the character and appearance of the Conservation Area.

The proposed venue contributes positively to the formal planned alignment of the First New Town by terminating the axial view along George Street, cleaning 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.

The proposals are therefore judged to be in accordance with Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

There are positive impacts on equalities and human rights arising from the creation of a high-quality environment 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.

## **Outcome of previous Committee**

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This application was previously considered by Committee on 24.04.2019

## Links

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[Policies and guidance for this application](#)

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

# Report

## **Application for Listed Building Consent 18/07730/LBC at 35 - 36 St Andrew Square, Edinburgh, EH2 2AD. Proposed demolitions, alterations, remodelling and erection of extension to the listed building.**

### **Recommendations**

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

### **Background**

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#### **2.1 Site description**

The application 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 listed buildings and monuments in proximity to the site.

Dundas House is highly significant as one of the first and grandest town houses in the First New Town. It comprises a freestanding symmetrical villa, in a 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. The original villa was built with a separate single storey kitchen block linked via a colonnaded screen wall/passage and a freestanding two-storey stable block and court to the south and south east.

Dundas House was built contrary to James Craig's plan for the 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 No.35), remains one of the few surviving original architectural compositions on the square.

Originally built as a residence for Lord Dundas, the building has been in institutional use since 1787 and has been remodelled and extended on a number of occasions including the addition of a front porch; library and banking house extending eastwards from the position of the former kitchen block between 1835 and 1850; and most notably, by the 1858 Peddie and Kinnear designed domed banking hall in 1858. Further extensions, also by Peddie and Kinnear, included a two-storey south wing and a small single storey extension to the north west corner of the banking hall which were added in 1875. During the late 1950s and early 1960s, infill development and extensions by architects Gratton and McLean were undertaken to the south of the banking hall. These comprised the addition of a mansard roof to the former library and bank house building and a two-storey infill block between this and the banking hall. In 1965, a large four to five storey flat roofed computer block linked to the former library and bank house was built to the rear of the banking hall.

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

## 2.2 Site History

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

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

- May 2019 - 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**

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### **3.1 Description of the Proposal**

In May 2019, The City of Edinburgh Council granted planning permission and listed building consent for this application (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), therefore, remain live.

As a consequence of the mediation process, the applicant has varied the design of the proposed development. Revised and updated drawings and plans, with full supporting documentation, were submitted to the council as Scheme Three.

For the avoidance of doubt, these plans and drawings and the supporting information supersede the previous design which was granted listed building consent but subsequently reduced by the Court.

The application proposes the removal of the 1960's extension located to the rear of Dundas House and the erection of a new extension to accommodate a 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.

### *Concert hall*

The building is divided into three main blocks/masses: The auditorium, The South Block (front of house & main entrance) and The North block (back of house). The accommodation is split over eight levels, with public access to Basement One to Level Three only.

The proposed gross floor area of the music venue building is 7,625 sq. m (reduced from the previous 11,347sq m) 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 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 proposed venue is organised around the oval form of the concert hall volume sitting on axis with George Street. This volume contains the main concert hall with its stage platform. 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. Two lower, overlapping volumes house the venue's ancillary and public functions.

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 auditorium has been designed to have a flawless acoustic to attract both national and international performers. It is this world class acoustic criteria that has determined its overall height, scale and massing.

The application proposes to use 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. Vehicular access 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 public through when not in use.

### *External alterations to Dundas House*

Enabling works to the rear of Dundas House include the removal of 1958 rear entrance lobby on the rear (east) elevation of Dundas House with associated repairs and making good elevations. This will include masonry repairs and the infilling openings following the down taking of existing extensions where these have removed elements of original fabric. Alterations are proposed to some window profiles, including infilling some windows and exposing the lower section of the rear elevation within the new building.

The extension will be built over the existing light well to the basement and physically attaches to Dundas House via a soft non-structural connection across a 155 sqm blank portion of the rear (east) elevation of the banking hall. 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 allowing for the historic cornice and corbel details of the wing to remain undisturbed. Shared rainwater goods including a box gutter between the concert hall and banking hall is also proposed. A small lightwell courtyard has also been formed to the southwest corner in order to permit light into adjacent Dundas House accommodation.

### *Internal alterations to Dundas House*

Internally, the historic rear façade of the banking hall will be partially exposed within the ground floor foyer. The formation of a single connection from the new venue's foyer to the banking hall to provide direct access between the historic and new building is also proposed. This will incorporate a centrally aligned timber panelled double door with opaque windows and architraves to match the profile and detailing with those existing within the banking hall. Further minor reconfigurations and alterations to facilitate RBS's retained banking functions within the building include a replacement stair and communications room.

### 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 11.347m<sup>2</sup> to 7,625m<sup>2</sup>;
- 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.

The assessment of this application for listed building consent has been informed by the Heritage Statement submitted in support of the listed building consent application, and also other supporting information, including the Environmental Impact Assessment (EIA) and Integrated Impact Assessment (IIA) reports submitted as part of the associated detailed application for planning permission

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

### Supporting information

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

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

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

### **3.2 Determining Issues**

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

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

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

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

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

In determining applications for Listed Building consent in a conservation area, it is principally the HES Policy and guidance that the proposals should be assessed against. The Development Plan is not a statutory test. However, the policies of the Local Development Plan (LDP) inform the assessment of the proposals and are a material consideration.

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

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

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

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

### **3.3 Assessment**

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

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

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

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

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

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

The introductory paragraph in Historic Environment Scotland's (HES) 'Interim Guidance on the Principles of Listed Building Consent' 2019 (GPLBC) identifies:

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

The assessment on character and setting of the listed building and character and appearance of the conservation area have been informed by the Heritage Statement submitted in support of the listed building consent application, and also other supporting information, including the Environmental Impact Assessment (EIA) and Integrated Impact Assessment (IIA) Reports, submitted as part of the associated detailed application for planning permission.

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

**Method of assessment**

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

Stage 1:

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

The relevant Managing Change Guidance applicable to this assessment is:

- a. Extensions
- b. Interiors
- c. Setting

## Stage 2:

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

### **HES Managing Change in the Historic Environment - Extensions guidance**

HES Managing Change in the Historic Environment: Extension's guidance (2010) notes that key issues in extending a historic building require that they:

- 1) *must protect the character and appearance of the building;*
- 2) *should be subordinate in scale and form;*
- 3) *should be located on a secondary elevation and*
- 4) *must be designed in a high-quality manner using appropriate materials.*

*Furthermore, it is not expected that an extension, or extensions, will dominate a listed building either through scale, materials, location or height. The document notes that extensions should be sensitive and modestly scaled, skilfully sited, and should generally be lower and set-back behind the principal façade. Extensions that would 'unbalance a symmetrical elevation and threaten the original design concept should be avoided'.*

### **HES Managing Change 'Extensions' and 'Interiors' Guidance Key Issue 1 - 'Character and Appearance'**

#### *External alterations to Dundas House*

The proposed demolition works primarily involve the 1960's office block by Glasgow architects Gratton & McLean. This block does not contribute to the special architectural interest of Dundas House and its removal is therefore acceptable. However, it should be acknowledged that the existing extension is set-off the rear elevation of the listed building and is of a much smaller scale than the proposed concert hall. The 1960's office block is therefore relatively concealed from public views. The extension to form the proposed new concert hall is planned to directly connect with the rear facade of the banking hall, itself a mid-19th Century extension to the original Dundas House and is of a far greater scale, massing and height than the existing office block.

The covering of the light wells will alter a previously compromised feature given the extent of previous extensions and additions to the rear facade of the banking hall. Within the context of the wider proposals and the benefits the alterations will allow for enhanced public realm will help mitigate any negative impact on the building. Similarly, the proposed blocking up of windows on the rear of Dundas House, which would become part of the interior of the concert hall, is a minor alteration acceptable in the context of the wider proposals. Furthermore, 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 155 sqm of the blank portion of the existing building to the rear of the banking hall abuts to the new building by a solid yet, 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 allows for 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 majority of the remaining external alterations to main building are minor in nature and have no adverse impact on the building or any features of architectural or historic interest. 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.

#### *Alterations to the curtilage of Dundas House*

The removal of the sections of shared boundary wall with 35 St Andrew Square is assessed in detail through the separate application for listed building consent for 35 St Andrew Square (application reference number: 18/07127/LBC). However, the shared boundary walls also, delineate the original curtilage of the historic feu to Dundas House. Whilst their removal will dilute the sense of place and historical understanding of the Dundas House undermining an important element of its special architectural character and historic interest, their removal will permit vehicular access into the site from the east of the site and improve the permeability of the concert halls site to pedestrians. A picked finish to the unified Whinstone setts used within the wider public realm proposals within the site help to subtly delineate and define the historic feus of both Dundas House and 35 St Andrew Square whilst also enabling a seamless surface for drainage, vehicle overrun and pedestrian movement.

#### *Internal alterations to Dundas House*

The proposed internal alterations include a new opening between the new concert hall and Dundas House. The opening is modest in scale, suitably detailed and would have no adverse impact on the building or any features of historic or architectural interest. The alteration would create a physical opening between Dundas House and the new concert hall and would allow access through the banking hall and into the new extension when deemed appropriate. The opening reinforces the axial nature of the wider proposals for the concert hall through the opening in allowing a route from the original Dundas House on axis with George Street, through the original villa, later banking hall and into the concert hall and comprises a very positive feature of the design. This opening is important to the scheme by facilitating a permanent connection between the concert hall with the banking hall of Dundas house to allow for further flexibility in the case of special events.

The majority of the remaining internal alterations are minor in nature, taking place in secondary spaces of Dundas House and having no adverse impact on the building or any features of architectural or historic interest.

## **HES Managing Change 'Extensions' guidance Key Issue 2 - 'Scale, Massing and Form'**

The extension, to form the proposed new concert hall, is planned to directly connect with the rear facade of the banking hall, itself a mid-19th Century extension to the original Dundas House and is of a far greater scale, massing and height than the existing office block. From immediately outside the boundary railings, to the front of the listed building, the extension would not be visible above the roof line of Dundas House. The extension would protrude on either side of the building, but would not be visually prominent or impact on the building or its setting. Only as the viewer moves through St Andrew Square and along George Street does the extension become visible and visually dominant. These views clearly highlight that the scale, massing and form of the extension is not in keeping with HES guidance on extensions to listed buildings. Due to the scale, massing and form, and how the building is attached directly to the rear elevation of Dundas House, the proposed extension has an adverse impact on the character of the listed building including its setting.

The HES Managing Change guidance on 'Extensions' states that extensions *should be subordinate in scale and form*. The height and mass of the extension is significantly larger than the relatively modestly sized Dundas House and, regardless of visibility, would have an impact on the architectural composition of the listed building. While the building would read as a new building, not an extension, in long views, the integrity, composition and character of Dundas House would be compromised to some degree by attaching such a significant structure to the rear.

Due to the depth of Dundas House and the fact the building has a forecourt and is set back from the street edge, the extension is also set far back in the site. In addition, the architects have attempted to mitigate the height of the building through design. However, 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'*. This requirement results in a building of significant size that would have an adverse impact on the integrity, composition and setting of the listed building by virtue of its scale, mass and form.

However, there are mitigating factors relating to the altered form and massing of the new building in scheme three that has sought to adopt a simpler, more cohesive backdrop to the rear of Dundas House, against which, its profile can still be read. The classical architectural composition including the subtle crown detailing and use of one contrasting material to the rear helps to create a uniform canvas against which Dundas House can be more clearly interpreted. The material qualities including its unified use on the new building helps propel Dundas House forward into views to allow the viewer to interpret it more clearly. Nevertheless, the new building has a impact on the setting of Dundas House when considered in isolation. However, against the baseline of St James development, the proposed building is beneficial to the understanding, appreciation and experience of Dundas House, in these longer views along George Street.

While the composition is considered as a positive response to Dundas House, the scale of the new building is not subordinate.

### **HES Managing Change 'Extensions' guidance Key Issue 3 - 'Position on the building'**

The extension, to form the proposed new concert hall, will directly connect with the plainly detailed rear facade of the banking hall, itself a mid-19th Century extension to the original Dundas House. Whilst the extension is located on a secondary elevation, it will impact on the principal elevation of Dundas House due to its scale.

### **HES Managing Change 'Extensions' guidance Key Issue 4 - 'Design and Materials'**

The new building seeks to respond to Dundas House and the surrounding historic buildings with its proportions and materials representing a contemporary, high quality architectural response to the New Town character.

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 offer generous 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 visually richer 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. The building touches the ground delicately, either meeting the stone ground plane with a carefully detailed flushed footing or sitting atop a perimeter bench along the south and west facades.

The central portion of the venue's facades are defined by the depth, relief and verticality across its surfaces. This composition embraces the verticality of neoclassical facades found throughout the New Town, reducing this language to its fundamental elements of depth and order. Due to acoustic sensitivity of the drum volume, windows are only afforded at its ground floor, making it a predominantly opaque volume.

The application of a continuous façade treatment to this central portion provides a consistently calm backdrop to Dundas House and its flanking pavilions.

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. The glazed elements of the façade from windows to revolving doors, are unified through a common metalwork language which is also picked up in the entrance canopies.

Whether solid or glazed, the regular rhythm of vertical pilasters provides visual continuity across the façade ensuring that the identity of the Dunard Centre is consistent from all approaches to the site.

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 refined yet subtle crown that announces the public nature of the building from every approach. The crown is formed through a deeper rebated panel that creates a band around the drum's entire perimeter. This band is then capped by an articulated cornice that curves and blends into each honed pilaster. 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 factors have been integrated into the design to mitigate the risk of water staining.

As an extension to a Category 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 and overall, the design of the development is based on a strong concept which draws upon Dundas House and the positive characteristics of the surrounding area.

#### *Conclusion - HES Managing Change Guidance on 'Extensions' and 'Interiors'*

The proposals will not diminish the special interest of Dundas House through the interventions proposed to its interiors or external building fabric and present an extension that's design is based on a strong concept which draws upon the positive characteristics of the existing composition and surrounding area.



Nevertheless, the proposed extension does not fully comply with the HES Managing Change guidance on 'Extensions' by virtue of its insubordinate scale failing to respect the architectural integrity, composition and setting of the listed building to the detriment of its special architectural character and historic interest.

However, the proposed design seeks to mitigate these negative impacts 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.

Therefore, and on balance, the design preserves the architectural integrity of Dundas House and the detailing of the interface will ensure all works to the historic building are reversible

#### *Historic Environment Scotland consultation response*

Historic Environment Scotland (HES) do not object to these considerations in this or the corresponding planning application. HES is content that the proposed direct physical interventions would not unduly diminish the building's special architectural and historic interest, preserving the existing compositional relationship Dundas House has with the Square and its flanking pavilions. However, HES consider that the proposals would not conform to their Managing Change guidance on 'Extensions' to historic buildings. Nevertheless, due to the constrained urban site, HES consider the more significant impacts will be on the setting of the building.

It is considered appropriate to further consider the detailed impacts of the scale, massing and form of the proposals on the setting of Dundas House by examining the proposals within the context of HES Managing Change in the Historic Environment guidance on 'Setting'.

#### **HES Managing Change in the Historic Environment - Setting guidance**

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

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

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

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

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

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

### **HES Managing Change 'Setting' guidance, point 1 - 'Identify the historic assets that might be affected'**

For the purposes of this listed building assessment, Dundas House is the historic asset most directly affected. However, the setting of Dundas House includes 35 and 37 St Andrew Square and therefore, the impacts on these buildings need to be taken into account when considering the setting of Dundas House.

### **HES Managing Change 'Setting' guidance, point 2 - 'Define the setting'**

The existing setting of Dundas House is much changed from when it was originally constructed. As one of the first buildings in the First New Town, it was set against the back drop of a significant garden area and countryside. The twinned flanking pavilion townhouses were built shortly after the main listed building creating the set piece along with the forecourt of Dundas House and clearly define its relationship to St Andrew Square on the principal George Street axis. The buildings now form part of a dense urban context as the square and surrounding built environment have been developed through time. The building sits on axis at the east end of George Street and St Andrew Square.

Of primary significance in the composition of the site is Dundas House, flanked by the two pavilion buildings, 35 and 37 St Andrew Square providing a unified and distinct architectural composition that is clearly legible on both site and plan. These buildings help frame Dundas House and add to the significance of the building and its setting.

This set-piece of Dundas House and its two flanking pavilion buildings can be appreciated in a range of axial views to and from Dundas House from St Andrew Square, including Cultural Heritage (CH) Viewpoint 3, 5 and 6, where the symmetry of Dundas House and its pavilions on the axis of the street can be observed. It is however acknowledged, that views of its surrounding urban context within St Andrew Square from along George Street have never been static. There are a number of taller structures both beside and to the rear of the building. These include buildings constructed during the 19th and 20th Centuries such as the Harvey Nichols department store; the demolished St James Centre; and its replacement which is nearing completion. The category '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 category 'A' listed Melville Monument, sits directly in front of Dundas House within the centre of St Andrew Square as a key landmark in the east axial view. Given this urban context, Dundas House is not dominant in views along George Street.

Dundas House now comprises part of this very dense urban context as the square and surrounding built environment has been developed and further redeveloped through time. The present surroundings and baseline for the assessment of impact on setting is the Edinburgh St James Development, including the landmark hotel currently under construction.

The site is surrounded by larger buildings such as the twinned pavilion buildings with the adjoining Harvey Nichols and former Bank of Scotland building at 38-39 St Andrew Square to either side. The category 'A' listed tenement on St James Square can be seen behind Dundas House in more distant views of the site. All these buildings create a setting that, when viewed from distance, results in a lack of clarity to the category 'A' listed building and its flanking townhouses. The height of the buildings to the rear, result in Dundas House becoming lost within the dense urban environment.

### **HES Managing Change 'Setting' Guidance, point 3 - 'Evaluate the potential impact of the proposed changes'**

The Design and Access Statement has been informed by the series of verified views included in the Cultural Heritage section of the EIA Report that explores how the setting of Dundas House exists against the baseline context and how the proposed concert hall would affect these views. The St James Quarter development undoubtedly has a significant impact on the setting of Dundas House and how the building is read in both long and more close up views.

#### *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 complements the traditional stonework and roofing of Dundas House and other buildings in the New Town. The classical architectural language and use of a complimentary material in texture and colour 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 concert hall, 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.

### *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 - HES Managing Change guidance on 'Setting'*

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.

#### *Historic Environment Scotland consultation response*

Historic Environment Scotland (HES) do not object in this or the corresponding planning application. HES consider the setting of Dundas House would be integrated with the townscape in longer views, against the backdrop of the St James Square and hotel development. However, in closer views the new building will remain visible and, consider that there would be an adverse impact on the setting of Dundas House from views from the eastern side of St Andrew Square, with the development visible above the roofscape of Dundas House, losing some of the buildings current silhouette against the skyline. However, HES confirm that this adverse impact is much reduced from Scheme Two.

#### **Overall Stage 1 Assessment - HES Managing Change Guidance on 'Extensions', 'Interiors' and 'Setting'**

The proposals will not diminish the special interest of Dundas House through the interventions proposed to its interiors or external building fabric. However, the proposed extension does not fully comply with the HES Managing Change guidance on 'Extensions' by virtue of its insubordinate scale failing to respect the architectural integrity, composition and setting of the listed building. The proposed design seeks to mitigate these negative impacts 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 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.

Therefore, it can be concluded that on balance, the design preserves the architectural integrity and setting of Dundas House.

## Stage 2 Assessment

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

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

### **GPLBC Point a - Special interest**

Dundas House is an internationally important building. It is one of the finest Georgian houses, built by Sir William Chambers for Sir Laurence Dundas, and one of the earliest buildings in the New Town. Built contrary to James Craig's New Town plan, on a site identified for a public building (St Andrew's Church), it sits on axis with George Street in a significant location within the New Town and World Heritage Site. It is acknowledged, that despite being remodelled and extended on a number of occasions including the addition of the banking hall and the 1960's four to five storey computer block it retains its original form as a freestanding symmetrically designed classical Georgian villa of modest proportions. Despite continuous changes to the surrounding built environment, it retains a presence on St Andrew Square by virtue of its design.

Though relatively small, it is flanked by 35 and 37 St Andrew Square which, as a composition, along with the forecourt to Dundas House create an important set piece and comprises a very significant surviving part of the original fabric of Edinburgh's New Town. Dundas House contributes considerably to the townscape of the New Town Conservation Area and the Old and New Towns of Edinburgh World Heritage Site.

### **GPLBC Point b - Scale of impact**

Whilst the principle of the use is acceptable in this location the nature and acoustic requirements of the use dictates the scale, mass and form of the proposed extension. As a result, the extension is a significant intervention to an extremely important category 'A' listed building. The proposals will not diminish the special interest of Dundas House through the interventions proposed to its interiors or external building fabric. However, the proposed extension does not fully comply with the HES Managing Change guidance on 'Extensions' by virtue of its insubordinate scale failing to respect the architectural integrity, composition and setting of the listed building.

The proposed design seeks to mitigate these negative impacts 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 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.

Therefore, it can be concluded that on balance, the scale of the individual adverse impacts identified on the integrity, composition and setting of the listed building are such that overall, the proposal preserves the architectural character, integrity and setting of Dundas House.

### **GPLBC Point c - Other options for use of the building**

The site is currently used by the Royal Bank of Scotland. While the 1960's extension is currently vacant, it forms part of the RBS site and could still be used as an office or an alternative use without significant alteration.

### **GPLBC Point d - Significant Benefits**

The applicant has submitted a Socio-Economic and Cultural Impact Assessment to support the corresponding application for planning permission, a topic which was also scoped into the EIA Report.

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 in its ambitions as part of the creative and cultural industries.

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

The report of handling for the parallel full planning application sets out the benefits the proposal brings to the City in this location and contends that the use would make an exceptionally positive contribution towards the city's cultural, social and educational provision. These arise because of the development's location being sited adjacent to IMPACT Scotland's offices at 35 St Andrew Square, where the National Youth Choir of Scotland will also be located. This allows them to establish a regional training choir and singing programme for communities across Edinburgh. The site also benefits from excellent public transport and active travel links. This exceptional level of benefit sets out a compelling case for justifying a departure from the presumption set out in paragraph 8 of the GPLBC.

## **Stage 2 Assessment Conclusion - Paragraph 15 GPLBC (2019)**

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

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

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

### **b) 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 site is located within the New Town Conservation Area. The essential characteristics of the Conservation Area as identified through the New Town Conservation Area Character Appraisal include:

- the formal plan layouts, spacious stone-built terraces, broad streets and an overall classical elegance.
- views and vistas, including axial views along George Street.
- terminated vistas have been planned within the grid layouts, using churches, monuments, buildings and civic statutory, resulting in an abundance of landmark buildings. These terminated vistas and the long-distance views across and out of the Conservation Area are important features.



- 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 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 Views 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 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 as the sky space opens out to the north and south, 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 section 3.3a), 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 significant, long-term and 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.

Development which rises above the prevailing building height is only permitted 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, development is supported 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 general 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 the agreed skyspace. 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 (VP 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 is considered not significant and a neutral effect during operation. Despite the value of this view and medium-high susceptibility of viewers, the magnitude of change is low, owing to distance from the viewpoint (1.3 km), the more limited proportion of the view occupied by the proposal and its flat roofline, relative height and colour match to the historic fabric of the New Town.

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 limited 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. The report relating to the detailed application for planning permission recommends a condition on lighting to ensure that any lighting is appropriate for the historic context of the area.

## **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 proposal creates a new visual composition with the backdrop of the St James Central Hotel that is not part of one architectural set piece but rather a design response to reconcile the relationship between two contemporary forms. In this regard, its form is a logical and positive response.

### **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 the assessment section of the associated application for planning permission, 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.

### c) Impacts on equalities and rights are acceptable

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

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

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

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

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.

The elements of the scheme such as, the demolition of the 1960's computer block and the creation of the new access between the banking hall and the concert hall including further internal alterations to Dundas House covered solely within this application for listed building consent are judged to not give rise to any overriding concerns.

#### d) Public representations have been addressed

Material issues raised in objection to scheme three

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

Material representations raised in support to scheme one and two

- Positively contribute to the cultural offer of not just Edinburgh, but of Scotland helping to attract visitors which will benefit the wider economy. Addressed in 3.3a);
- Design and form of the proposed building is of sufficient quality that paired with the cultural benefits arising from the scheme, justify the impact on the listed building including its setting. Addressed in 3.3a); and
- Public benefits of the proposals outside of performance time given the provision of function spaces, café, foyer and crown walkway as publicly accessible spaces within the scheme. Addressed in 3.3a).



## Material representations raised in objection to scheme one and two

- The proposed building is on an excessive scale, massing and in close proximity to Dundas House of which it will tower above. - this is addressed in section 3.3a);
- The proposed will diminish Dundas House's special interest and status as the focal point at the east end of Edinburgh's New Town Plan. - this is addressed in section 3.3a) and 3.3b);
- The site is too small to accommodate the proposed building with the proposals representing an overdevelopment of it. - this is addressed in section 3.3a);
- Impact on the character and special interest of the A listed Dundas House - this is addressed in section 3.3a);
- Previous extensions to the original building including the subordinate design of the domed banking hall extension when viewed from St Andrew Square and should be used to inform the manner of further extension or alteration of Dundas House. - this is addressed in section 3.3a);
- Concern about the way in which the proposed building butts up against Dundas House. A more pronounced link between the old and new would enable the extension to read as a separate building. - this is addressed in section 3.3a);
- The demolition of the boundary wall to the north of the forecourt is not acceptable as it fails to recognise the important role the pavilions and boundary walls flanking the forecourt of Dundas House play in creating an appropriate symmetrical setting for classical building - this is addressed in section 3.3a);
- Concern over the proposed demolition of the boundary wall adjacent to 23-26 St James Square - this now benefits from planning permission and listed building consent under application references 20/01010/LBC, 20/01012/FUL and 20/03355/LBC ; and
- Object to the removal of part of the original boundary wall at Elder Street - this now benefits from planning permission and listed building consent under application references 20/01010/LBC, 20/01012/FUL and 20/03355/LBC.

## Non-material issues raised in objection to scheme one and two

- Concern over the demolition of the 1960's block and the depth of the basement excavations and proximity to the neighbouring tenement building, and the potential damage this could cause to neighbouring buildings during construction particularly through the use of piling - This is a legal matter.

## Conclusion

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

The proposals will not diminish the special interest of Dundas House through the interventions proposed to its interiors or external building fabric.

However, the proposed extension does not fully comply with the HES Managing Change guidance on 'Extensions' by virtue of its insubordinate scale failing to respect the architectural integrity, composition and setting of the listed building. The proposed design seeks to mitigate these negative impacts 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 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.

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

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

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

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, it does not result in significant harm to the character and appearance of the Conservation Area.

The proposed venue contributes positively to the formal planned alignment of the First New Town by terminating the axial view along George Street, cleaning 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.

The proposals are therefore judged to be in accordance with Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

### *Material considerations*

There are positive impacts on equalities and human rights arising from the creation of a high-quality environment 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.

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

### **Addendum to Assessment**

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

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

#### **Conditions :-**

1. 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.
2. Prior to commencement of works above ground, full details of the juncture between the banking hall and the extension proposed shall be submitted to and approved in writing by the Planning Authority, and shall be implemented on site, in accordance with the approved details
3. 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.
4. Prior to commencement of works above ground, full details including materials specification for the proposed doors between the banking hall and concert hall foyer shall be submitted to and approved in writing by the Planning Authority, and shall be implemented on site, in accordance with the approved.

**Reasons:-**

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

**Informatives:-**

It should be noted that:

1. The works hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.
2. This consent is for listed building consent only. Work must not begin until other necessary consents, eg planning permission, have been obtained.
3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. External light fittings on the existing building will require Listed Building Consent
6. Any proposed signage requires advertisement consent and depending on the location, may require Listed Building Consent.

**Financial impact**

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

There are no financial implications to the Council.

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

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

## **Equalities impact**

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

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

## **Sustainability impact**

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

The parallel application for full planning permission (ref: 18/04657/FUL) meets the sustainability requirements of the Edinburgh Design Guidance

## **Consultation and engagement**

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

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

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

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

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

- The Architectural Heritage Society of Scotland

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

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

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

## Background reading/external references

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

**Statutory Development  
Plan Provision**

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

**Date registered**

19 September 2018

**Drawing numbers/Scheme**

01, 02, 03B, 05A-06A, 07B-09B, 11B-14B, 16B, 17A, 18A,,  
20B-24B, 25A, 26B-27B, 29B-33B, 38B-39B, 40A, 42B-44B,,  
45B-47B, 48A, 49B, 50B, 57A, 62A, 63B, 66B, 67A, 68B, 69B,,  
70B-72B, 73A, 74B-76B, 78B, 79A, 80A, 81B-85B, 86A-87A, 88B,,  
90B-92B, 99A, 101-107, 107-120,

Scheme 3

**David Givan**

Chief Planning Officer

PLACE

The City of Edinburgh Council

Contact: Daniel Lodge, Planning officer

E-mail: [daniel.lodge@edinburgh.gov.uk](mailto:daniel.lodge@edinburgh.gov.uk)

**Links - Policies**

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**Relevant Policies:**

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

**Relevant Government Guidance on Historic Environment.**

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

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

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

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

Managing Change in the Historic Environment: Extensions sets out Government guidance on the principles that apply to extending listed buildings.

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

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

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

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

### **Relevant policies of the Edinburgh City Local Plan.**

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

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

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

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

#### World Heritage Site

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

The organic plan form of the medieval Old Town and the clarity of the geometrically planned neo-classical New Town together with the outstanding historic buildings are



fundamental characteristics of the World Heritage Site. All proposals affecting the plan form or historic buildings, including their setting, will be considered for their impact on their design integrity.

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

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

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

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

# Appendix 1

## **Application for Listed Building Consent 18/07730/LBC At 35 - 36 St Andrew Square, Edinburgh, EH2 2AD Proposed demolitions, alterations, remodelling and erection of extension to the listed building.**

### **Consultations**

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

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

#### *The proposals*

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

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

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

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

#### *Our Advice*

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

#### *Listed building consent*

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

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

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

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

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

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

#### *Environmental Impact Assessment*

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

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

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

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

#### *Further Information*

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

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

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

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

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

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

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

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

### *Demolition*

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

### *Extension*

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

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

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

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

### *Alterations*

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

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

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

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

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

## *Conclusion*

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

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

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

## *Annex 2 - Planning Application*

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

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

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

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

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

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

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

*Dundas House*

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

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

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

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

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

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

*The historic asset*

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

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

#### *Define and analyse the setting*

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

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

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

#### *Evaluate the impact*

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

*In the current proposals, the height of the new development has been significantly reduced. We consider the setting of Dundas House would again be integrated with the townscape in longer views, against the backdrop of the St James Square and hotel*

*development. In closer views the new building will remain visible, but any impact on its setting would be reduced.*

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

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

### *Conclusion*

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

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

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

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

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

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

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

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



## Conclusion

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

## Annex 3 - EIA Report

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

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

## Structure and content

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

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

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

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

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

## Methodology

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

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

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

#### *Assessment*

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

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

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

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

#### *Conclusion*

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

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

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

#### *Listed building consent applications*

*18/07127/LBC*

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

18/07730/LBC

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

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

*Planning application*

18/04657/FUL

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

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

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

*Environmental Impact Assessment*

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

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

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

#### *Further Information*

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

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

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

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

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

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

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

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

#### *Our Advice*

##### *Listed building consent*

*18/07127/LBC*

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

*18/07730/LBC*

*We are content that the proposed demolitions, alterations and extension to Dundas House would not significantly diminish the special architectural and historic interest of*

*the building. However, we consider there would be a significant impact on the setting of the building, which we have commented on under the associated application for planning permission below.*

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

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

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

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

#### *Environmental Impact Assessment*

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

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

#### *Further Information*

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

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

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

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

#### *Historic Environment Scotland*

#### *ANNEX 1 Listed building consents*

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

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

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

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

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

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

#### *Demolition*

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

#### *Extension*

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

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

#### *Alterations*

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

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

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

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

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

## *Conclusion*

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

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

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

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

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

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

#### **Our Advice**

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

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

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

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

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

### **Archaeology - Scheme 3 response dated 13/09/2021**

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

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

*The site occurs within the former gardens and curtilage of the A-listed RBS HQ (Dundas House, 36 St Andrew Square). Originally designed by Sir William Chambers this building was constructed in 1771 for Sir Laurence Dundas, becoming the HQ for the RBS in 1825.*



*The site has seen several extensions since the mid- 19th century, most notably the construction of the banking hall + library wing (by Peddie and Kinnear) in 1858 and the 1960's rear extension and carparking. Located at the heart of James Craig's Georgian New Town the site is also surrounded by a number of A + B listed buildings including New Register House, 24-25 James Craig Walk, 37-39 St Andrew Square + 27-31 James Craig Walk*

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

### *Historic Buildings*

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

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

### *Buried Archaeology*

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

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

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

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

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

### **Archaeology - Scheme 2 response dated 22/10/2018**

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

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

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

#### *Historic Buildings*

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

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

### *Buried Archaeology*

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

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

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

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

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

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

*If multiplier effects and other indirect impacts are taken into account, these figures rise to 134 headcount jobs and £4.6m of GVA per annum for the proposed development*

versus 440 FTE jobs and £42.9m of GVA per annum (2019 prices) for the existing building.

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

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

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

#### *Commentary on existing uses*

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

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

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

### *Commentary on existing use*

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

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

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

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

#### *Commentary on proposed uses*

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

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

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

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

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

#### *Overall impact*

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

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

#### *Other considerations*

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

#### **SUMMARY RESPONSE TO CONSULTATION**

*The development as proposed will result in the loss of a 1,764 sqm office building within the central business district; it is estimated that, if fully occupied by a financial services occupier, this building could directly and indirectly support a total of 388 FTE jobs and*



*£32.6m of GVA per annum (2016 prices). Figures provided by the applicant suggest that the proposed development could directly and indirectly support 204 headcount jobs and £7.1m of GVA per annum.*

*This response is made on behalf of Economic Development.*

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

### *1. Context*

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

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

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

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

### *2. Cultural Impact*

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

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

*Equally, the year round cultural infrastructure is a critical element in enabling the festivals to thrive. The capital investment in the IMPACT Scotland proposal therefore reflects the interdependence between renewing cultural content as well as infrastructure, only this*

*twin approach will avoid eroding Edinburgh's status as the pre-eminent cultural 'Festival City'.*

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

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

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

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

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

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

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

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

### **3. Summary**

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

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

### **1 Recommendations**

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

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

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

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

## 2 Introduction

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

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

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

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

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

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

## 3 Position, Scale, Massing and Design

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

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

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

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

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

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

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

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

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

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

#### 4 *Public Realm*

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

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

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

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

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

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

## 5 Permeability

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

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

## 6 Use

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

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

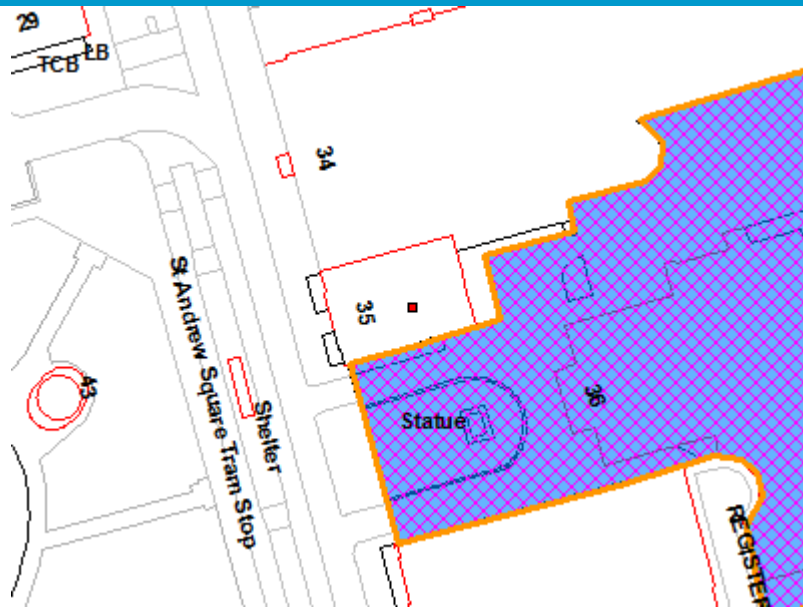
## 7 Security

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

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

## Location Plan

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**END**