

# Development Management Sub-Committee Report

**Wednesday 24 May 2023**

**Application for Listed Building Consent  
15 Dalkeith Road, Edinburgh, EH16 5BH.**

**Proposal: Selective demolition, adaptation, extension and upgrading of Class 4 office building, demolition of car park and ancillary buildings and proposed development of residential accommodation with associated landscaping, parking and infrastructure.**

**Item – Committee Hearing  
Application Number – 22/04768/LBC  
Ward – B15 - Southside/Newington**

## **Reasons for Referral to Committee**

The application has been referred to the Development Management Sub-Committee because 10 material objections have been received and it is recommended for approval. Consequently, under the Council's Scheme of Delegation, the application must be determined by the Development Management Sub-Committee.

## **Recommendation**

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

## **Summary**

The proposal is acceptable with regard to Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 in terms of preserving a substantial part and features of the listed buildings that embody the special architectural interest that it possesses, and there will be no detrimental impact on the setting of any listed buildings, or the character and appearance of the conservation area.

Overall, the proposals comply with Historic Environment Scotland policy and guidance, with particular regard to securing a sustainable and long-term use of the retained part of this category A listed building. Whilst the level of demolition and interventions will have a significant impact on the listed building, these are justified as being the minimum level of intervention necessary to preserve the building's special interest.

## SECTION A – Application Background

### Site Description

The application site measures 2.5 hectares and is located on the north side of Dalkeith Road to the east of Holyrood Park Road and west of Parkside Terrace. East Parkside runs adjacent to the north site boundary. The Old Town and city centre is approximately one mile to the north-west.

The site is occupied by the former Scottish Widows Headquarters building and its landscaped grounds which replaced a Baronial style printworks (Parkside Works), dating from 1872 with later additions. The current building is a category A-listed, modern Expressionist style, reinforced concrete, modular office by Sir Basil Spence, Glover and Ferguson constructed between 1972 and 1976 (reference LB50213, listed on 03.03.2006). The structure comprises a cluster of 12 interlocking hexagonal blocks ranging from one to four storeys in height, with a basement and sub-basement, with continuous curtain wall glazing formed in brown solar glass within bronzed metal frames. The open-plan layout follows the 'Burolandschaft' concept which evolved in German office architecture in the 1950s and 1960s and the hexagonal modular layout was influenced by the BP-Haus headquarters in Hamburg, although the dolerite formations of Salisbury Crags could also have inspired the design.

A concrete constructed, double-height undercroft car park and boiler house with 300 parking spaces and a few cycle spaces is located to the rear of the building in the northern section of the site, concealed beneath landscape terraces and a sunken garden area to the south-east of the car park. These structures connect to the main building via an underground tunnel. There are 50 surface car parking spaces under pilotis at lower ground level in the south-east section of the site.

The surrounding landscaping is integral to the building, occupying approximately 1.6 hectares of the site. The design was influenced by Dame Sylvia Crowe and transitions from a more formal character, with two reflecting pools and areas of lawn addressing the urban context of Dalkeith Road, to a naturally inspired landscape in the rear section of the site towards Holyrood Park. A key feature of the section is the landscaped decks over the undercroft car park. The original species mix comprised a selection of simple, robust, low level ground cover with a limited selection of hardy native trees. Some of this planting scheme is still evident, but much has been obscured by overgrowth and other invasive species. The seating areas along the walkway over the car park are later additions.

The interior comprises extensive open-plan floorplates with two service core stairs and lifts without any traditional corridors. The stairwells and feature internal walls and external walling at the lower levels are faced in riven Yorkstone. The original 'Dampaline' acoustic ceiling tiles, fluorescent strip lighting and yellow-green carpet tiles have been replaced with modern finishes and none of the 1970's office furniture or café fittings remain. Nothing is left of Dame Sylvia Crowe's original interior planting scheme and other notable internal landscape features. However, the original exposed coffered ceiling slabs are still in situ within the entrance area.

The building has been vacant since 2020 and has not changed use from an office since construction. The gross internal floor area is approximately 26,800 square meters.

The site includes an L-plan former stable and carriage-house block, known as the Jointers' Workshop, at the far north-east corner of the site. The building is named after its most recent use as a training venue for electrical cable jointers. This structure is not listed and comprises a two-storey, squared sandstone constructed range with a longer east-west running wing. The stables and carriage house form the shorter north-south running wing. The longer wing has decorative crowstepped gables. An electricity substation sits on the site of the former coachman's house to the immediate south of the Jointer's Workshop behind a high sandstone wall and the gated vehicular entrance from Holyrood Park Road is flanked by stone piers. The Jointer's Workshop was built up against a warehouse that was demolished in 1981 and replaced by the current brick retaining wall along its eastern edge. The range was altered when converted to garages in 1925 and is now in very poor structural condition.

The following listed buildings are located in the immediate vicinity of the site:

- the Royal Commonwealth Pool at 21 Dalkeith Road and Holyrood Park Road, category A listed (reference LB43148, listed on 29.03.1996);
- University of Edinburgh, St Leonard's Hall at 18 Holyrood Park Road, including boundary walls, category A listed (reference LB28619, listed on 12.12.1974);
- Preston Street Primary School at corner of East Preston Street and Dalkeith Road, category B listed building (reference LB30047, listed on 12.12.1974); and
- Newington Old Burial Ground at 31 East Preston Street and Dalkeith Road, boundary walls and watchtower, category B listed building (reference LB27934, listed on 14.12.1970).

The site is within the South Side Conservation Area.

## **Description of the Proposal**

The proposal is for the demolition of five out of the twelve modules of the existing office building and the undercroft car park. The remaining structure will be adapted, extended and upgraded to form office accommodation comprising 19,252 square metres in gross internal floor area, including an ancillary café, creche and cycle store.

### Demolitions/External Alterations

The five modules to be demolished (Modules 8-12) constitute the north section of the existing office building.

The seven retained modules (Modules 1-7) on the building's south section will be extensively altered and upgraded.

Externally, the glazed curtain wall system will be removed and replaced. The new system will be constructed primarily with tinted, opaque glass panels with openable windows on the upper levels. The proposed framing will largely replicate the uniform mullion pattern of the existing and will be constructed in Polyester Powder Coated (PPC) aluminium with dark bronze toned mullions and transoms.

The lower section of the module used as the reception area (Module 1) will be extended slightly with the same detailing, except for clear, butt-jointed glazing replacing the existing aluminium framed, clear glazing. The supporting columns over the pond and bridge leading to the front entrance will be retained with the formation of a larger entrance platt.

The roof structure of the module at the building's west corner (Module 4) will be removed and an additional storey will be added in matching design and materials. Half the roof of Module 3 in the central area of the building will be removed to incorporate a large sky light.

The undercroft car park and energy centre/boiler house in the north-east section of the site will be demolished.

Sections of the existing stone boundary wall and railings will be removed to form new vehicular/pedestrian accesses from Holyrood Park Road and Parkside Terrace.

### Internal Alterations

The proposed internal adaptations to the building are associated with the aims of improving the interior's legibility and the retention, restoration and enhancement of existing original features. These works include the following:

- the formation of a full-height, central circulation core in Module 3 with concrete connecting walkways, and a feature spiral hanging stair and internal, irrigated, green wall;
- the hanging stairs in Modules 3 and 9, including the Yorkstone clad walling in the stairwells, will be relocated to new small stair cores in Module 5, but with replacement handrails and barriers;
- the existing steel "Management" stair located in the reception area (within Module 1) will be relocated to a new café in Module 7, along with its original decorative features;
- the relocation of the original double doors, and any original panelling remaining within the Boardroom at third floor level in Module 3, to first floor level to decorate the back wall of the office floor in Module 1; and
- areas of original Yorkstone cladding in various locations will be relocated in Module 1 (along with the commemorative opening inscription within the former staff restaurant), at courtyard and lower ground level as wall surfaces within the proposed circulation spaces, in the new café and within the landscaping (including around the amphitheatre outside Module 7).

Elsewhere the internal alterations involve the erection of new partitions to form a cycle store and changing facilities at lower ground level within Module 4, and other limited partitioning associated with the formation of new café and other facilities within other multi-function areas.

Non-original ceilings and partitions will be removed across all floors.

## Scheme 1

The original scheme proposed:

- a different curtain wall pattern and detailing for the office building and
- less salvage and re-use of original internal materials within the new office.

An associated application for planning permission has been submitted for the erection of a new residential development comprising 174 apartments in five separate blocks on the remainder of the site, including associated landscaping, parking and infrastructure (reference 22/04766/FUL).

The proposed substantial demolition of the Joiners' Workshop is the subject of the associated application for conservation area consent (reference 22/04769/CON).

### **Supporting Information**

- Heritage Statement;
- Planning Statement and Addendum;
- Design and Access Statement and Addendum;
- Townscape and Visual Appraisal and Addendum;
- Existing Building Performance Review Report (ARUP);
- Report on Suitability for Occupier Occupation and
- Economic Impact Assessment.

### **Relevant Site History**

13/03005/LBC  
15 Dalkeith Road  
Edinburgh  
EH16 5BH

Internal alterations to remove existing partitioning, ceilings, panelling and remove asbestos materials and to upgrade power, data, lighting and air-conditioning. Installation of new raised access floor, ceilings, and the reconstruction of 6No rooms, including 1st floor offices and boardroom, salvaging existing elements where possible, and re-creating internal finishes, features, built in fixtures and furniture to match the detailing and appearance of the previous existing installation.

Granted  
13 September 2013

### **Other Relevant Site History**

There is no other relevant planning history.

### **Pre-Application process**

Pre-application discussions took place on this application.

### **Consultation Engagement**

Historic Environment Scotland

Archaeologist

Refer to Appendix 1 for a summary of the consultation response.

## Publicity and Public Engagement

**Date of Neighbour Notification:** 5 April 2023

**Date of Renotification of Neighbour Notification:** Not Applicable

**Press Publication Date(s):** 14 April 2023/14 October 2022

**Site Notices Date(s):** 11 April 2023/11 October 2022

**Number of Contributors:** 41

## Section B - Assessment

### Determining Issues

Due to the proposals relating to a listed building(s) within a conservation area, this application for listed building consent requires to be assessed against Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 (the "1997 Heritage Act"):

- Having due regard to HES Policy and guidance, do the proposals:
  - a. harm a listed building or its setting? or
  - 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) 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) for approving them?

### Assessment

To address these determining issues, it needs to be considered whether:

#### **a) The proposals harm the listed building or its setting?**

The following Historic Environment Scotland (HES) guidance is relevant in the determination of this application:

- Managing Change: Use and Adaptation of Listed Buildings
- Managing Change: Setting
- Managing Change: Interiors

## Character of Listed Building

### Principle of Use and Adaptation

Historic Environment Scotland (HES) emphasises the importance of retaining listed buildings and only resorting to demolition if every other option has been explored. Keeping listed buildings in an existing use or finding a new use that has the least possible impact, is the best way to protect them. Alterations to a building, even if extensive, is better than losing the building entirely.

This proposal is assessed against HES's Managing Change publication "Use and Adaptation of Listed Buildings". HES's guidance, "Demolition of Listed Buildings" does not apply in this case, as only 5 out of 12 modules (Modules 8-12) will be removed, meaning that approximately two-thirds of the building will remain. "Demolition" is defined as the total or substantial demolition of a listed building, which is not applicable to the more selective level of demolition proposed in this development.

The proposal is acceptable with regard to Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 in terms of preserving a substantial part and features of the listed buildings that embody the special architectural interest that it possesses, and there will be no detrimental impact on the setting of any listed buildings, or the character and appearance of the conservation area.

Overall, the proposals comply with Historic Environment Scotland policy and guidance, with particular regard to securing a sustainable and long-term use of the retained part of this category A listed building. Whilst the level of demolition and interventions will have a significant impact on the listed building, these are justified as being the minimum level of intervention necessary to preserve the building's special interest.

Section 4 on page 13 of the "Use and Adaptation" guidance concerns 'selective demolition' which is "*a different consideration from substantial demolition, which would involve the total or substantial loss of a listed building.*" 'Selective demolition' is described as involving "*the removal, or demolition, of parts of a listed building in order to enable the significant parts of a listed building to be retained.*"

The overarching principle of this development is to retain a significant, representative, part of the former headquarters building and use the form and architectural character of the structure to inspire positive change on the remainder of the site.

This development does not qualify as "enabling development" as defined in Section 5 of HES's "Use and Adaptation" guidance. Whilst a substantial element of new build development is proposed, the extent of demolition proposed is not dependent on the level of new development proposed on the rest of the site. The percentage of the building to be retained is primarily driven by the impracticality of the structure in its existing scale for conversion to an office fit for the current market, or any other viable use. Nor does the new build element comprise "*'development' which would normally be contrary to planning policies, in order to obtain a desired objective.*" This acceptability of the development in terms of National Planning Framework 4 (NPF4) and the Edinburgh Local Development Plan (LDP) is assessed in Section B below.

## Need for Selective Demolition

The category A listed, former Scottish Widows Headquarters was designed in 1970-71 by the architectural practice of Sir Basil Spence, Glover & Ferguson and engineered by Ove Arup and Partners. Spence's partner, John Hardie Glover, and his senior assistant, John Marnoch Legge, were the principal designers.

The design was informed by the Bürolandschaft type of office-planning (literally 'office-landscape') which evolved in Germany in the 1950s and 1960s, based on open-plan offices developed in the USA in the 1940s. The interior design concept comprised large open spaces that could be decently lit and serviced with informal layouts suggesting a landscape, enhanced by the inclusion of potted plants. Whether or not the modular hexagonal layout of this building was designed deliberately to reflect the dolerite formations of Salisbury Crags, this is a key characteristic of the structure, along with the differing heights of its constituent blocks, its reflective brown glazed walls, riven Yorkstone external finishes and boundary walls, and coffered concrete ceilings.

### Current Building Condition

To understand the need for the level of selective demolition proposed, the unique circumstances of this building need to be explained. When the office became vacant in March 2020, the applicant carried out a comprehensive feasibility exercise to determine whether the building could be re-let to an office occupier in its current form and condition, or whether further intervention would be required. This work established that, in its current form, the building is no longer fit for purpose, particularly in terms of its energy performance - an Energy Performance Certificate (EPC) rating of G, the lowest category on the EPC scale). Against current standards, the levels of daylighting, sunlight and heat are also poor, as is fire safety. Also, the façade is in poor condition and contains significant amounts of asbestos.

When built, the headquarters represented a modern working environment of its time but is now a vast office space which, in its current scale, form and specification, cannot deliver many of the basic aspects of design and specification that companies now expect for their workforces. Furthermore, the basic elements of the structure make it extremely challenging to address many of these requirements, without undertaking substantial alterations at significant cost. The problems of the current building are categorised under the following.

### *Carbon Emissions*

As stated above, the existing building performs very poorly with an EPC rating of G and consumes around 70% more energy than that of an equivalent benchmark building. Even if the entire envelope of the building were completely refurbished and all existing services replaced with modern high efficiency equipment, the highest achievable EPC rating would be C+. This is significant in terms of the current office market as the higher specification, the more likely the office space will attract blue-chip companies who are in the market for single occupancy statement buildings. These companies look at their carbon footprint as a marketing tool, so anything lower than an EPC rating of A would not attract such occupiers. Leasing the building as a single office space is the optimum way to incur the least alterations to the original building, especially internally. The various uses that have been explored by the applicant will be considered later in this section, as this also has a bearing on the level of demolition proposed.



### *Building Envelope Performance*

The building envelope performance significantly impacts on the energy consumption and carbon emissions identified above. The façade is in poor condition with evidence of structural movement and with failed gaskets and seals to the extent that it has reached the end of its movement capacity. There is significant asbestos within the façade that provides fire protection at the floor slab edges and extends around the entire perimeter of the building at every level. This needs to be removed. The zinc roof covering has been frequently patched repaired and is now at the end of its serviceable life.

### *Daylighting and Thermal Comfort*

The existing glazing has a dark tint which significantly reduces the amount of daylight passing through the façade. Modern standards of daylighting are set out in the Building Research Establishment Environmental Assessment Method (BREEAM) (Visual Comfort) and WELL standard (daylight simulation). The performance of the existing façade falls significantly below these performance requirements and the expansive floorplates, which restricts daylighting to mainly the perimeter areas, contribute significantly to this poor performance.

The internal office environment is also substandard in terms of temperature control as the existing façade is not able to achieve the required solar loads targets. Previous occupants have confirmed that temperatures near the south-facing windows were uncomfortably hot, whilst in winter, the opposite applied when workers on the north side of the building were almost always cold. The original double-skin façade arrangement has been decommissioned and is no longer in operation so, in winter, the current arrangement would have a performance similar to a poorly performing standard single glazed façade.

### *Building Services*

The building is served by systems that are inefficient in operation, create on-site carbon emissions and are generally at or beyond their economic life expectancy. These need to be replaced/upgraded to decarbonise the building and make the office marketable for the intended class of occupier. The issue of fire safety is most relevant to the assessment of the proposed internal alterations which form part of the associated application for listed building consent.

### *Summary*

It is clear, that in its current form, the building is no longer fit for purpose in terms of energy performance, daylight, sunlight and heat levels, as well as being sub-standard in terms of fire safety and health and wellbeing (presence of asbestos). Although the concrete frame is structurally sound and the building has been well maintained to date, the extent of the challenges identified above in terms of non-compliance with current environmental and safety standards, whether required by regulation or occupier expectation, are particularly onerous. The question then is whether the proposed use and extent of demolition/alteration is acceptable.

## Alternative Uses and Office Market

### *Office*

The building was designed as a headquarters for a single occupier and is a particularly large office premises with a gross internal floor area of approximately 26,800 square meters. An office of this scale is unlikely to appeal to any future occupiers in today's market, particularly in Edinburgh where the number of such requirements has diminished over the years. For example, since 1998, there has only been one letting in Edinburgh over 18,500 square metres and around 80% of transactions in the current office market is for space below 465 square metres. The building's configuration and floorplate would make repurposing it for multi, rather than single, occupancy exceptionally difficult and would create a heavily compromised space which would be unattractive to prospective occupiers. This is over and above the other problems of sustainability accreditation, building performance, fire safety and health and wellbeing, as well as the potentially harmful effects of sub-division on the building's interior configuration as originally designed.

Modern office accommodation places far more emphasis on staff welfare and wellness in terms of natural daylight and air circulation than that which this building can deliver in its current condition. For example, large areas of the building at its lowest levels were specifically designed for paper filing/storage and plant which is now not needed on this scale (in terms of paperwork) or volume/location (in the case of plant). The adaptability of these spaces in their current form is very limited due to their restricted size, height and levels of daylight, as well as arrangement and location.

Despite the pandemic, 2021 saw a significant increase in occupier activity, particularly large corporates who are relocating to new and more sustainable office buildings on the expiry of leases. Edinburgh has one of the lowest vacancy rates for offices and a depleted pipeline of new developments, so this lack of supply and high levels of demand is driving rental growth. The options for existing Edinburgh businesses to relocate or expand will be limited, as will new build opportunities and this will result in a greater reliance on refurbished stock, such as 15 Dalkeith Road, being returned to the office market.

### *Residential*

The extensive floor depth dimensions are such that it would be impractical to convert the building into residential apartments, particularly in terms of daylighting levels and ventilation without significant interventions that would harm the character of the listed building. Also, the size and depth of the floorplates would mean that large areas would become redundant once rooms requiring natural daylight and ventilation were positioned around the perimeter. The unsuitability of residential use for this office building reinforces the conservation principle that the original use for which a listed building was designed is often that in which it should remain to best protect its historic and/or architectural character. This large, open-plan 1970's office headquarters with its unusual hexagonal, modular composition was designed for a single non-domestic occupier, so any use that would involve compartmentation and require a level of occupier amenity would be problematic in terms of the extent of physical intervention required.

Other alternative uses were considered for the building, including a laboratory, sport and leisure complex, urban/vertical farming facility, data centre, archive store, a museum/art gallery, residences, a hotel, and student housing. For any these uses, the building would present a unique and complex set of challenges from economic viability to the need for more intrusive alterations to meet current building regulations. Whilst, technically, the building could continue to operate in office use in its existing configuration and condition with a minimum level of intervention to meet basic functionality and safety requirements, more substantial changes are unavoidable in terms of economic viability. However, of the other possible uses explored that would result in a similar level of interventions as those required for continued office use, these would not work in terms of financial viability.

## Extent of Demolition

### *Office Building*

Normally, with regards to selective demolition of listed buildings, the best options for removal are those parts which are least important in terms of historic and/or architectural character, such as later extensions. However, the constituent components of this modular building are contemporary and have less obvious hierarchy, externally and internally, than seen in traditional historic buildings. That said, the main entrance/reception area is architecturally distinct and the three modules at the north-east (rear) end are comparatively low. Also, the frontage facing Dalkeith Road with its reflecting pools is more formal than the Holyrood Park Road frontage, particularly around the vehicular entrance and surface car park. The selection of Modules 8-12 for demolition is therefore logical in terms of the relatively low impact of these elements on the overall composition.

The removal of Modules 8-12 will address multiple challenges that would arise were the building to remain in its current extent in terms of use and financial viability. This extent of demolition will also permit the retention of the majority part of the existing structure, including its most significant and characteristic elements.

### *Undercroft Car Park*

The proposed demolition of the undercroft car park/boiler house structure is primarily to accommodate a high-quality residential redevelopment on a scale and configuration that is financially viability, whilst providing an appropriate level of residential amenity and accessibility for its future occupiers. The removal of the car park will also assist in the opening up of the previously private parts of the site for barrier-free public access. Whilst the structure is an interesting and integral feature of the original development, it occupies most of the south-east area of the site and its retention would not allow any beneficial residential development. Also, due to the structure's V-plan form and single-sided open edge, conversion to residential accommodation would be impractical. Other possible uses, such as a cycle/car park, would not address the fundamental need for, and benefits of, a residential development of the extent proposed.

### *Summary*

The level of demolition proposed is significant. However, this is necessary and proportionate due to the particular circumstances and challenges of this atypical, modern listed building.

## Other External Alterations

The principal parts of the building that are the most publicly visible, Modules 1 to 7, will be retained with some remodelling, but without this having any impact on their essential architectural character of hexagonal modules of differing heights. The most significant alterations proposed are examined in detail below.

### *Façade Replacement*

The bronze exterior of the building is a significant element of the structures' architectural character, so the replacement of the original curtain walling in its entirety, albeit altered previously to an extent, is a major intervention. However, the existing curtain walling does not meet current energy standards and would not meet the requirements of potential future occupiers. It is also reaching the end of its movement capacities and requires asbestos removal throughout. Upgrading the building's performance to meet today's standards requires a wholesale replacement of the existing curtain walling, as a complete overhaul of the existing system would not resolve the major problems of daylighting, thermal comfort, glare, and ventilation of the floorplates. Accordingly, a new thermally efficient aluminium curtain wall system with 'intelligent' glass panels is proposed.

The curtain wall was designed as a ventilated double skin system with interstitial blind shading to temper internal temperatures and control glare. However, shortly after the first occupation, inefficiencies of the system became evident and the mechanical ventilation services were removed along with most of the interstitial blinds which were replaced with internal roller blinds. The replacement blinds have a negative impact on the appearance of the façade as originally designed by breaking its visual uniformity. New raised access floors were also installed which blocked the opening of the inner openable panes, preventing access and maintenance. On this basis and given the poor condition of the existing system and its inability to be upgraded to the required current performance standards, the principle of wholesale replacement is acceptable.

The design of the proposed replacement system has been informed by the need to retain a glazed exterior and its solid, reflective properties, along with the existing glazing pattern and bronze aesthetic of the façade. This is in addition to performance specifications. The existing curtain wall comprises bronze body-tinted glass with aluminium mullions which have bronzed face caps externally, with the exception of two areas - the Reception and Cafeteria, where clear glass and anodized aluminium caps were used. The treatment of the reception area is assessed in detail below.

Detailed analysis of possible glazed facade systems demonstrated that the use of bronze tinted glass would not be sufficient in providing the required amount of daylighting internally, so the proposed 'intelligent' glazing has been specified to re-create the dark, uniform and reflective appearance of bronze tinted glass, whilst providing the necessary daylighting levels.

The proposed system comprises thermally efficient aluminium curtain walling with 'intelligent' glass panels and 250mm deep vertical bronzed mullions internally and bronze finished transoms. A notable amendment to the original pattern is the positioning of the horizontal spandrel bands to low level on each floor rather than high level as existing. This is to allow additional daylight penetration, as the current position of the spandrels blocks natural daylight. However, this alteration will not be noticeable within the context of the overall façade composition. In the revised scheme, the size of the glazed panels has been adjusted to suit a 1500mm grid with 750mm panels at the corner junctions to match the existing pattern.

'Intelligent' glass uses electrochromic technology whereby applying a small electrical charge will cause lithium ions to transfer between microscopic thin layers of ceramic material and cause the glass to tint, reducing light levels as well as energy loads. The system and each individual panel can be fully automated and the level of tinting is centrally determined based on live weather data, location, time and date. The system is therefore very efficient. Whilst this is a completely different glazing system to the original bronze tinted glass, the uniformity of the façade's appearance will be maintained, and the removal of the existing roller blinds will enhance this uniformity. Also, the facades of existing buildings with 'intelligent' glazing present a uniform appearance even when parts of the buildings' glazing are tinted fully and others are not, so there is no risk of a visually patchwork façade at 15 Dalkeith Road.

Whilst the proposed aluminium framing is light grey in tone and the 'intelligent' glazing will tint a warm grey rather than bronze colour, the incorporation of deep vertical bronzed mullions and bronze finished transoms will give a bronze tone appearance to the overall façade to mimic the original design, as well as its characteristic solid, reflectiveness. The new spandrel panels will match the tinted state of the intelligent glass in appearance, so these will not disrupt the visual uniformity of the façade. Neither will the proposed bronze toned metal louvred panels in concealed areas as part of the services strategy or the openable, inwards-tilting windows to provide night-time cooling. These openable windows are required due to the proposed exposure of the existing concrete floor structures internally. Finally, the external face cap profiling will match the original detailing as closely as possible and accentuate the vertical mullions.

The proposed new façade will therefore respect the original materiality of the building as well as the cutting-edge technology of the structure when it was designed, whilst contributing to the level of building performance that is required under current standards.

### *Reception Area Extension*

The reception area is within Module 1 and comprises almost the whole module which has a distinct appearance from the rest of the building. Module 1 is in a prominent, advanced location on the Dalkeith Road frontage and, despite its relative low height, has visual prominence due its elevation on stilts over a moat with bridge accesses. The structure also has a distinctive, recessed lower level with clear glazing and a concrete cantilevered base which connects with the pond when filled.

However, in its current form, the reception area falls short of some of the main requirements now for the entrance of office buildings of similar size and quality, especially in terms of space for reception facilities, waiting areas and sanitary facilities. For this reason, some alterations are required.

The proposed external alterations are modest in extent and recognise the significance of Module 1 within the overall function and composition of the listed building. The retention of the module's primary function as main office reception and entrance, with the addition of a modest extension at lower level and moderate increase in the external entrance platt, will have minimal impact on Module 1's functional and architectural character. The concrete cantilevered base detailing will be recreated around the extended perimeter to match the existing form as this is an important component of the original design.

The most significant visual change to Module 1, apart from the extension at lower level, is the proposed replacement of the original aluminium-framed clear glazing with butt-jointed frameless clear glazing. The assumption is that the glazing in this section was clear, unlike the rest of the building, to allow relatively uninterrupted views from the exterior and interior over the water towards Arthur's Seat. A proposed frameless glazing system has been proposed to reinforce this concept by maximising transparency. Whilst this is a deviation from the original framed glazing, the existing system needs wholesale renewal for the same reasons as the curtain walling throughout the building needs replacing. In this location, the level of change is acceptable given that the appearance of the existing glazing system is already distinct from that of the rest of the building and the proposed frameless glazing is an attractive and appropriate contemporary addition to this 1970s' structure.

#### *Module 4 Added Storey*

The addition of a second storey on Module 4 in identical style is acceptable in principle, given that the building was constructed in modular form with the specific purpose of flexibility in terms of adding extra modules. This added height will increase natural daylight into the core of the building. Modules 1-10 are constructed with canted concrete roof structures to create falls to the perimeter gutters, whereas Modules 11 and 12 have flat concrete structures with secondary metal falls. These latter roofs were designed to take an additional storey or storeys. Although the additional storey on Module 4 will result in the loss of the existing roof, this is an acceptable compromise to achieve the required volume of office space. Also, the existing zinc roof coverings through the building are in poor condition and need wholesale replacement, so only a comparative amount of sound original roof fabric will be lost.

The second storey on Module 4 is also acceptable in terms of architectural character as it will have no detrimental impact on the original compositional contrast in height between Module 4 and the adjoining higher modules.

#### *Module 3 Atrium*

Lack of daylight penetration into the building was an issue created in the original design. Apart from the impacts on energy consumption and relatively dark working environment for staff, there was not enough daylight in the centre of the building to sustaining the potted plants. In this respect, the Bürolandschaft concept failed.

The proposed alterations include the removal of sections of the existing roof of Module 3 to form a new full height atrium within this module. The increased levels of natural light will allow the re-introduction of a sustainable landscape concept to the interior of the building, but this time in the form of a green wall.

This atrium will also have the wider purpose of enabling Modules 2 and 4-7 to function with appropriate levels of daylighting, accessibility, ventilation, acoustics and toilet facilities, as well as achieving the required fire safety and escape standards for prospective occupiers. At present, the existing stair cores are non-compliant in terms of current fire and escape regulations, including accessibility. Also, circulation within the building is inadequate in terms of the number and location of stair cores for the scale of the office. Legibility within the building is also poor and the proposed atrium will improve this significantly.

### *Roof Alterations*

All existing roof covering will be replaced in like-for-like materials and photovoltaic solar panels will be installation to improve environmental performance. A communal office roof terrace will be formed on Module 7.

### *Boundary Wall Alterations*

The existing stone boundary walls and railings enclosing the site will be retained with limited interventions to form new accesses or modify existing, including the addition of an accessible ramp alongside the original northern pedestrian access from Dalkeith Road. The loss of stone fabric from the 1970s' wall and 19th Century wall on Holyrood Park Road will be minimal and the visual solidity and continuity of the boundary walls will be maintained. The two gates to be removed on Parkside Terrace are not significant features of the building's original boundary treatment.

### Internal Alterations

Key elements of the building internally have operated poorly from the outset, including the glazing system and extensive open-plan floorplates. As a result, the interior has altered significantly over time, including the removal of the original 'Bürolandschaft' layout and fittings. A major scheme was undertaken in 2013, when the original partitioning, ceilings, panelling and floors were removed and replaced, and new power, lighting and air conditioning systems were installed. The Boardroom and adjoining rooms were also relocated.

The current inefficiency and technical issues detailed above are such that minimal intervention will no longer be sufficient for a viable occupier for this scale and location of office building. More significant interventions are now necessary to improve fire safety, circulation space, legibility, accessibility, daylighting, and the provision of other facilities and amenities, all of an appropriately high standard and specification for modern office use.

The proposed internal adaptations also aim to retain, restore and enhance the most significant surviving original features.

Whilst the proposed full-height, central circulation core in Module 3 is the most significant alteration in terms of altering the original modular character of the interior, this intervention will create a new dimension to the experience of the building including views up and through the structure. The proposed detailing and materials of the new connecting walkways and feature spiral hanging stair will respect the modernist 1970s' character of the listed office.

The green wall within this space will be a modern interpretation of the original interior landscaping, none of which has survived, and the plant species in the wall will be of appropriate type in appearance and growth pattern, as well as being suited to this internal location.

The relocation of the existing matching hanging stairs is necessary to accommodate the new central circulation core. The stairs will be located symmetrically within Module 5 where they can be arranged to ensure compliance with current regulations. This will enable regular use of these stair, which was intended in the original design. Whilst the existing stair flights, landings, hanging supports and Yorkstone walls will be re-used, the handrails and barriers cannot be used for the re-sited stairs without losing key constituent parts and being altered to an extent that the retained fabric would become meaningless. The new handrails and barriers will be designed to match the original detailing as closely as possible.

The significance of the Management stair in Module 1 has been lost due to the previous dismantling and relocation of the Boardroom from its original location (which connected with the stair) to third floor level in Module 3, during the 2013 refurbishment works. This relocation resulted in the loss of much of the room's original panelling fabric. The proposed new location for the stair in Module 7 is both practical and fitting in terms of showcasing this original feature along with its original decorative features, including its mirror cladding, pebble plinth and suspended lighting. Also, the original orange colour will be restored to the stringers.

As regards the loss of the Boardroom, this is acceptable given its current non-original location and extent of remaining original fabric. The surviving original double doors, along with any original panelling, will be used to decorate the back wall of the office floor in Module 1 at first floor level. This is an appropriate approach to the salvage of this material and the doors will be symmetrical positioned on the wall to reflect the formality of the former Boardroom.

The areas of original Yorkstone cladding to be reused will be sited in prominent communal amenity areas, so the significance and hierarchical purpose of this architectural detailing will be respected.

Areas to be partitioned to any extent will be within areas of the building that are not importance in terms of visual volume. The removal of non-original ceilings across all floors will reveal the exposed coffered ceiling slabs as architecturally interesting and decorative features, which will also showing the structure of the building.

### **Setting of Listed Buildings**

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."*

This section assesses the impact of the removal of Modules 8-12, along with the extensions to the listed office building, and the demolition of the undercroft car park on the setting of this building and significant listed buildings nearby.



The impact of the new residential development and associated landscaping on these settings is assessed in the parallel application for planning permission (reference 22/04766/FUL).

### *Former Scottish Widows Headquarters*

The setting of this listed building is defined primarily by its integral surrounding landscape, although the backdrop of Arthur's Seat and the Salisbury Crags is a significant element of its wider setting.

The extensive landscape around the office building is attributed to a concept by the celebrated landscape architect and garden designer, Dame Sylvia Crowe. Whilst it seems likely that the landscape design was in fact a more collaborative endeavour between the office architects and Dame Crowe, the resulting design is a key element of the building's setting. In essence, it comprises a landscape of more formal character within the front sections of the site (around the office building) which transitions to a more natural inspired landscape in the rear section of the site (around and above the car park and towards Holyrood Park).

However, whilst the public-facing landscape along Dalkeith Road and Parkside Terrace and at the corner of Holyrood Park Road has remained largely intact, the original planting of the rear garden area, including that on the undercroft car park roof, has failed in parts and has been re-planted in certain areas. Also, substantial sections of this rear landscaping are now overgrown, notably the planting on the roof of the car park which occupies a significant area of the site. In addition to later planting, there has been colonisation by opportunistic and invasive species and although some of the original planting scheme is still evident, much has been obscured by overgrowth and other unintended species.

Furthermore, certain species that were included in the original planting scheme, such as cotoneaster horizontalis and rosa rugosa, are now listed as controlled species under the Wildlife and Countryside Act 1981 and should be removed, as these pose a threat to native biodiversity and habitats.

The scale of the building is such that the symmetry of the existing plan is only readily appreciable from elevated viewpoints. Whilst the reduced building will be symmetrical in plan, as opposed to the current asymmetrical plan, asymmetry will be returned to the site through the layout of the new residential blocks. The proposed extensions to parts of the retained Modules 1-7 are relatively discreet and will have no detrimental effect on views of the building from within or outwith the site.

Whilst a substantial section of the original landscape is being redeveloped, the retention of the existing undercroft car park, on which a substantial area of this landscaping sits, is not viable. Also, the landscaping around and above this structure has changed significantly in terms of the original planting and intended appearance. For these reasons, the re-landscaping of this part of the site is acceptable in principle.

## Views

The most important views of this category A listed building are 'panoramic', that is, those which provide an unrestricted view of the landscape giving a continuous and unbroken survey of the surrounding area. The only significant 'vista' - where the view from a specific point is restricted and controlled by firm containing edges - is in East Preston Street, where the building terminates views eastwards along the street. Also, it is important to note that all views analysed are snapshots of transient streetscapes and can change significantly, even just a short distance from the viewpoint location. Times of day, different climatic conditions and seasonal variations also have a bearing on key views.

The Townscape and Visual Appraisal (TVA) submitted demonstrates how the proposed development respects the setting of the listed building in terms of scale and form. This setting includes the immediate landscaped grounds around the building along with the wider landscape setting and surrounding townscape.

In terms of the listed office building in views, Viewpoint 3: Dalkeith Road, Figure 8c and Viewpoint 7: East Preston Street/Newington Road, Figure 7c show no detrimental impact on the existing views of the office frontage after the removal of Modules 8-12. The extension of Module 4 by one storey will have no significant impact on any key views of the building.

From within the site, a particularly significant view is from the landscaped area between Dalkeith Road and Module 1 across the reflecting pool towards Arthur's Seat. The proposed extension of the reception area is modest in scale and will have no detrimental impact on this view. In fact, the frameless replacement glazing system will enhance visibility through the reception area and the sense of connection with the surrounding landscape as a result.

The appreciation of the landscape setting of the listed building from within the site will be enhanced through the creation of a suite of new internal views from within the altered office building towards Holyrood Park, especially from the new roof terrace on Module 7. The replacement curtain walling without blinds and with low-level spandrels will provide new and uninterrupted views in all directions, including from modules that will gain external facades once Modules 8-12 are removed.

From elevated viewpoints, the architectural composition of the listed building and its landscape setting are most apparent, so the impact of the proposed development in terms of the partial demolition of the existing building is analysed in Viewpoints 5 and 7 from the Salisbury Crags and Arthur's Seat respectively. Currently, views from these locations to the office building (Viewpoint 5, Figure 10a and b and Viewpoint 7, Figure 12a and b) show the distinctive asymmetrical cluster of tiered hexagonal structures, reducing in height towards the northern edge of the green landscaped site. The removal of modules 8-12 will change the appearance of the building from these heights, but the remaining office structure will still be a prominent and striking built feature in panoramic views of the site.

### *Commonwealth Pool and Other Listed Buildings*

The most prominent listed buildings in the surrounding area which will be impacted by the proposed development in terms of setting are the category A listed Royal Commonwealth Pool and St Leonard's Hall (part of Pollock Halls), and Preston Street Primary School and Newington Old Burial Ground, which are category B listed.

From Dalkeith Road and Holyrood Park Road, the demolition of Modules 8-12 and extensions to the retained part of the office building will have no measurable impact on any views of the Commonwealth Pool. Whilst these modernist buildings date from a similar era, they are distinct structures in form, architectural style and tone.

The settings of the listed buildings on the opposite side of Dalkeith Road will not be affected to any significant degree as these settings are defined by the existing modules of the listed office building which dominate the east side of Dalkeith Road. No significant change is proposed to these frontage modules.

### ***Conclusion in relation to the listed building***

The proposed scheme involves a major intervention in this category A listed building and its conterminous and integral designed landscape, as well as in the building's wider urban and landscaping setting. However, the extent of demolition, extension and alteration to the original office building and undercroft car park is a necessary and proportionate response to the scale of the building, combined with its current (and original) functional failings and shortcomings, and to the extent and complexities of making the building fit for a viable use in today's market.

Historic Environment Scotland's assessment of the scheme is based on detailed discussions and site meetings with the applicant's team and the Council, including an assessment from the Council on the viability of the proposals and the wider Edinburgh office market. Whilst HES commends the design development and commitment to low carbon principles, some elements of the proposals are considered radical and harmful to both the listed building and its setting. However, HES recognises the exceptional difficulties in ensuring the long-term future and reuse of this distinct, large-scale, modern listed building and considers it unlikely that a less harmful viable scheme for the listed building is possible. On this basis, HES does not object to the proposals.

The importance and special interest of the listed building and its landscape setting have been understood and recognised in the amended scheme which demonstrates a holistic evidence-based approach for the whole site, respecting the architectural character of the building and its conterminous landscaping. This is in keeping with the recommendations of the Edinburgh Urban Design Panel. The opportunities for a purely conservation-led approach are limited, due to the particular challenges of this building, and the proposed development will conserve and re-use what is reasonably possible in the circumstances detailed above.

Whilst the level of demolition is significant, this is the minimum action necessary to preserve a substantial part of the listed building and its most representative part in terms of scale, prominence on the site and architectural hierarchy. This modular building was designed to have modules added, or even removed, if required, and the original design was for a larger structure.

The special interest of this listed building therefore lies more in its architectural concept than in the precise collection of modules that are on site today. As regards the current landscape setting, this is a substantially altered version of the landscape that was designed to surround and complement the headquarters building. Much of the original planting has been obscured or lost, including important visual connections with the building and its wider landscape setting.

On this basis, whilst the proposed works will have a significant impact on the listed building and its setting, this impact will not be harmful in terms of preserving the character and setting of the listed building. Also, this scheme is the best possible option available and if the building were to come onto the open market, it is likely that a harmful scheme would come forward, including for the proposed demolition of the entire structure.

A condition has been applied to ensure that all the existing structures on the site are officially recorded and that a robust methodology statement is submitted for approval before any of these structures or features are demolished/altered.

Further conditions have been applied to ensure that the details and specifications for all proposed external materials (including salvaged materials) for alterations and repairs to the retained historic assets on the site are appropriate.

The proposals are acceptable in terms of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and relevant HES guidance as the proposals preserve a representative majority part of the listed building that embodies its special architectural interest.

#### **b) The proposals harm the character or appearance of the conservation area?**

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

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

This section assesses the impact of the removal of Modules 8-12, along with the extensions to the listed office building, demolition of the undercroft car park, and alterations to the listed boundaries, on the conservation area. The impact of the new residential development and associated landscaping on the conservation area is assessed in the parallel application for planning permission (reference 22/04766/FUL).

The South Side Conservation Area covers a large urban area which includes various historical periods and stages of development forming a variety of character areas with different spatial patterns. The character appraisal splits the conservation area into five sub-areas representing distinctive patterns of growth and development. This site falls within the "Fifth Expansion Area": a distinct section of the conservation area, added in March 2019, characterised by unique and individual buildings/groups of buildings within their own integral settings and the wider landscape setting of Holyrood Park. These buildings include the Royal Commonwealth Pool, former Scottish Widows Headquarters and Pollock Halls which, together, form an outstanding category A listed group.

The South Site Conservation Area Character Appraisal summaries the key characteristics of the Fifth Expansion Area as follows:

*"The urban grain of the area is coarser than much of the Conservation Area as it comprises large scale buildings that are set back from the pavement within open space. The settings of the existing building, and Pollock Halls contains trees and shrubs, and a linear tree group separates the latter from the Royal Commonwealth Pool's rear car park'. Less of the historic layout and fewer historic buildings remain within the area surrounding the site, which is largely modern and atypical of central Edinburgh. These further divert from the typical characteristics of the Conservation Area'".*

Whilst the impact of the proposed development on the listed building at 15 Dalkeith Road and its setting is significant, the effect of change within the South Side Conservation Area is far more moderate, given the scale and nature of the broad context.

The proposed removal of Modules 1-8 and alterations and extensions to remaining Modules 1-7 will have no significant impact on existing street level views of the site.

As detailed in the section above, the proposed works will have a more significant impact on elevated views from Holyrood Park due to the removal of the five zinc-roofed 1970s' modules and existing landscaping in the rear section of the site. However, these impacts will not be detrimental to the character and appearance of this part of the conservation area, given that the essential character of the listed office building, defined as a substantial geometric mass echoing the stepped basalt rock formations of the Salisbury Crags, within a landscape setting, will not be altered.

The existing hard boundary, comprising stone walls and railings, is an important part of the site's character and this will be retained, with only modest breaches for new entrances into the site.

The proposed demolition of the Joiner's Workshop is assessed in the associated application for conservation area consent (reference 22/04769/CON).

### ***Conclusion in relation to the conservation area***

The proposed development will preserve the character and appearance of the Fifth Expansion Area of the South Side Conservation Area by safeguarding the listed office building for the future in an appropriate form.

The proposals preserve the character and appearance of the conservation area in accordance with the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

### **c) Other matters to consider**

The following matters have been identified for consideration:

## **Archaeological Remains**

The site lies within an area of archaeological significance, as the Scottish Widows headquarters was built on the site of the former Victorian Nelson and Sons Parkside Works, dating from 1870, and the Edinburgh Geographical Institute, dating from 1888.

As the site has been extensively developed over the years, it is unlikely that any significant archaeological features are present. However, the proposals involve the removal of approximately 30% of the existing A listed building on the site, along with its original carpark and some original internal features. On this basis, a programme of historic building recording is required to be undertaken during demolition to record elements that are affected. Also, a detailed mitigation strategy is required for the temporary removal and storage of the commemorative opening inscription within the former staff restaurant during these works, and its reinstatement within the refurbished building.

In addition, a provision for public/community engagement during this programme of archaeological works should be put in place.

A condition has been applied to ensure that a comprehensive programme of archaeological work is undertaken, incorporating the above requirements.

The implications of the proposed substantial demolition of the Joiner's Workshop and associated works in archaeological terms are assessed in the associated application for conservation area consent (reference 22/04769/CON).

## **Equalities and human rights**

Due regard has been given to section 149 of the Equalities Act 2010. No impacts have been identified.

Consideration has been given to human rights. No impacts have been identified through the assessment and no comments have been received in relation to human rights.

## **Public representations**

A summary of the representations is provided below.

### Scheme 1

Grange/Prestonfield Community Council (GPCC)

The GPCC's comments regarding the principle and adaptability of office use, sustainability, affordable housing, height of the new residential blocks, loss of trees and car parking relate to the associated application for planning permission (reference 22/04766/FUL).

#### *material objections*

- will destroy award-winning ensemble of Scotland's 20th architecture and landscape design, contrary to local, national and international conservation policy and practice;

- adverse effect on scale and form of listed building through part demolition;
- project does not demonstrate heritage-led approach and will result in significant and irreversible loss of fabric;
- no respect for original plan-form;
- building could be retained and subdivided to accommodate variety of occupants with without need for extremely high sustainability aims;
- relocation of spandrels panels of façade glazing from top to base of windows;
- extension of reception area and removal of management stair will disturb original composition of staircase, pond and entry bridge;
- loss of original layout, hanging staircases, fixtures and finishes and creation of new central circulation zone,
- adverse effect of demolitions on relationship with listed Commonwealth Pool when viewed from key vantage points and
- loss of part of listed building does not preserve or enhance character or appearance of conservation area;

*The impact on the proposed works on existing listed building on site and the adjacent listed buildings, including the setting of both and case for partial demolition of the office structure and undercroft car park, and the impact on the South Side Conservation Area is assessed in sections a) and b) of the assessment. The relevant determining issue is whether the proposals are acceptable in terms of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and relevant HES guidance. In this case, the level of demolition proposed and other interventions are necessary to prevent the total loss of the heritage asset.*

#### *support comment*

- retention and re-use of significant part of listed building.

#### *non-material comments*

The objection comments regarding the loss of the existing landscaping, sustainability issues, loss of trees, the impact on wildlife, scale and design of the new residential blocks, affordable housing provision, amount of green open space, impact on residential amenity and services, pedestrian access and safety, increase in noise and traffic congestion, car parking and waste collection are non-material to this application for listed building consent. These grounds of objection are addressed in the associated application for planning permission (reference 22/04766/FUL).

#### Scheme 2

- loss of a substantial portion of the listed building;
- adverse effect on scale and form of listed building through part demolition; and
- adverse effect of demolitions on relationship with listed Commonwealth Pool when viewed from key vantage points.

*The impact on the proposed works on existing listed building on site and the adjacent listed buildings, including the setting of both and case for partial demolition of the office structure and undercroft car park, is assessed in sections a) and b) of the assessment. The relevant determining issue is whether the proposals are acceptable in terms of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 and relevant HES guidance. In this case, the level of demolition proposed and other interventions are necessary to prevent the total loss of the heritage asset.*

*non-material comments*

Similar objection comments on the same non-material grounds as in Scheme 1 have been received. These grounds of objection are addressed in the associated application for planning permission (reference 22/04766/FUL).

### **Conclusion in relation to other matters considered**

The proposals do not raise any issues in relation to other matters identified.

### **Overall conclusion**

The proposal is acceptable with regard to Sections 14 and 64 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 in terms of preserving a substantial part and features of the listed buildings that embody the special architectural interest that it possesses, and there will be no detrimental impact on the setting of any listed buildings, or the character and appearance of the conservation area.

Overall, the proposals comply with Historic Environment Scotland policy and guidance, with particular regard to securing a sustainable and long-term use of the retained part of this category A listed building. Whilst the level of demolition and interventions will have a significant impact on the listed building, these are justified as being the minimum level of intervention necessary to preserve the building's special interest.

## **Section C - Conditions/Reasons/Informatives**

The recommendation is subject to the following;

### **Conditions**

1. No demolition of any listed structures on the site shall commence until the applicant has confirmed in writing the start date for the new development by the submission of a Notice of Initiation for the associated planning application reference 22/04766/FUL.
2. A detailed methodology statement for the demolition of Modules 8-12 and alterations to the retained Modules 1-7 hereby approved shall be submitted and approved in writing by the Planning Authority before any works commence on these structures. This shall include details of the proposed re-use of any materials/architectural features and details of the proposed repair/replacement materials.



No part of the development hereby approved shall be occupied until a substantial amount of the approved works to the retained part of the office building have been completed in a manner satisfactory to the Planning Authority and before written approval has been obtained from the Planning Authority.

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, public engagement, interpretation analysis and reporting, publication) in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority. This shall include detailed surveys to be undertaken prior to and during demolition/strip out works of the listed office building and the removal of the undercroft car park and existing landscaping on the site. These surveys will include surveyed elevations, phased plans, combined with photographic and written surveys and archival research to provide an accurate and permanent record of these assets.

A detailed mitigation strategy is also required for the temporary removal and storage of the commemorative opening inscription within the former staff restaurant during these works, and its reinstatement within the refurbished building.

4. Details of the proposed junction of the clear-glazed curtain wall and concrete base of the extended reception area hereby approved shall be submitted to and approved in writing by the Planning Authority before construction of this structure is commenced.

### **Reasons**

1. In order to retain and/or protect important elements of the existing character and amenity of the site.
2. In order to safeguard the character of the statutorily listed building.
3. In order to safeguard the interests of archaeological heritage.
4. To ensure that the detailing and appearance of this element closely matches that of the existing structure.

### **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.

### **Background Reading/External References**

To view details of the application go to the [Planning Portal](#)

### **Further Information - Local Development Plan**

**Date Registered: 22 September 2022**

**Drawing Numbers/Scheme**

01,02A-08A,09,10,11A,12,13A-20A,21,22,23A-26A,27-29,30A-36A,37,38,39A-40A,41,42A,43A,44,45A-66A,67,68,69A-71A,72,73A,74,74A,76,77A,78,79A,80,81A,82A,83+84A-86A

Scheme 2

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

Contact: Clare Macdonald, Senior Planning Officer  
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## Summary of Consultation Responses

NAME: Historic Environment Scotland

COMMENT: From the beginning of the pre-application process we have been aware that this is a distinctive, even unique, listed building with a particular set of complex issues, including the considerable scale of its existing open-plan floorplates, its use and location within the city, its largely-glazed facades and its landscaped and split-level site.

In our consideration of the applications, we have seen no issue with the principle of a mixed-use development on the site, welcoming the continued use of (the majority - and most visible portions of) the category A listed building as an office, assisting its intangible cultural significance. We are aware with the difficulties in converting the building to other uses that are perhaps more common in listed building casework in the city, and from an early stage accepted that the retention of the entire building in its current form and operation was unlikely.

However, it is clear that the current proposals are far from a conservation-based scheme. The demolition and truncation of the building, the extent and detail of the refurbishment and the scale of proposed new buildings would result in adverse, and harmful, impacts to both the listed building's special interest and its immediate and wider setting. There would also be impacts on the setting of the A-listed Royal Commonwealth Pool, the Royal Park of Holyrood and the inventory designed landscape of the Palace of Holyrood House.

Since the start of the pre-application process our objective has been to find a scheme that represents the least harmful viable scheme for the building and its setting, whilst retaining the elements that make up the building's special interest. We have tasked the applicants to substantiate that a less harmful set of proposals for the building's reuse does not exist, or is unlikely to exist.

We have received an assessment on the viability of the proposals, and the wider Edinburgh office market, from your Council, as well as an assessment from our in-house colleagues. We have also obtained additional information on the detailed design elements, including the glazing, foyer design and other internal features.

In conclusion, although we commend the design development and commitment to low carbon principles, the proposals are radical, and we consider they would be harmful to both the listed building and its setting. Having said this, after due consideration of the exceptional difficulties in ensuring the long-term future and reuse of a listed building of this scale and distinctiveness, and looking at the economic viability, on balance, we are not reasonably convinced that a less harmful viable scheme for the listed building and its setting is likely to exist. We think it possible that if these proposals were to fail and the building were to come onto the open market we may see a more harmful scheme for the building and its setting, or even proposals to demolish it completely. With this in mind, we have decided not to object to the current application(s).

If your Council is minded to approve the applications we would suggest a series of detailed conditions on the refurbishment of the listed building, including the glazing's appearance and detailing, salvage/reuse of existing stair cores, salvage/reuse of stone facings and timber panelling, foyer cantilever detail.

DATE: 1 May 2023

NAME: Archaeologist

COMMENT: The proposals with seek to remove roughly 30% of the current A-listed structure along with its original carpark and internal alterations. It is essential that a programme of historic building recording is undertaken during demolition to record elements that are affected.

A detailed mitigation strategy should be submitted for approval prior to any demolition works/development commencing for the taking down, securely storage and rebuilding of the Scottish Widows commemorative opening inscription.

The programme of archaeological works should contain provision for a programme of public/community engagement (e.g. site open days, viewing points, temporary interpretation boards), the scope of which to be agreed with CECAS.

Condition should be attached to ensure that these measures are undertaken.

DATE: 14 November 2022

The full consultation response can be viewed on the [Planning & Building Standards Portal](#).

## Location Plan



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