



HISTORIC SCOTLAND  
ALBA AOSMHOR

**By E-mail**

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Our ref: HGG/A/LA/1749  
Our Case ID: 201503521  
Your ref: 15/03989/FUL

17 September 2015

Dear Sirs

**Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013**  
**New Parliament House, 5-7 Regent Road, Edinburgh**

Thank you for your consultation dated which we received on 04 September.

You have consulted us because you believe the development may affect:

**B27987 - 5 AND 7 REGENT ROAD, FORMER ROYAL HIGH SCHOOL, INCLUDING LODGE, CLASSROOM BLOCK, RETAINING/BOUNDARY WALLS, GATEPOSTS AND RAILINGS**  
**WH2 Edinburgh City**  
**G00367 THE NEW TOWN GARDENS**

We have reviewed your consultation and we wish to **object** to the proposals as outlined below:

We have contacted your Council recently to explain that we will provide a full response on this DMPR consultation, together with our comments on the listed building consent application, by 02 October, when our comments on the Environmental Statement (ES) (EIA-EDB053) are due. We understand this approach has been accepted. In the meantime we include a few short paragraphs on why we are objecting to the application for planning permission.

**Listed Building**

We believe the proposed hotel development, in particular the redevelopment of the western playground, would have a significant adverse impact on the setting of the Category A listed former Royal High School, including views to and from the main building and associated structures (pavilions, screen walls, gateways and railings) which all contribute to the present integrity of the original concept. The proposed extensions to the listed building, by their height, scale and massing, would clearly dominate and overwhelm the listed building, challenging its primacy on the site and diminishing significantly the building's status as an internationally-acclaimed exemplar of Greek Revival architecture.



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**Designed Landscape and wider setting**

The development would also have an adverse impact on the integrity of the Designed Landscape of Calton Hill (included in The New Town Gardens Inventory designation). The proposals would impact on the key characteristics and landscape features of the hill, as well as the carefully planned setting and relationship between the hill and the former school, the latter having been thoughtfully designed and positioned to harmonise with the natural contours of the site. In turn, the development would impact too on the monuments on the hill and their important relationship with the former school, and on other adjacent Category A listed buildings including St Andrew's House.

**World Heritage Site**

Both the former Royal High School and Calton Hill have great importance within the Old and New Towns of Edinburgh World Heritage Site. The Statement of Outstanding Universal Value (OUV) in the current Management Plan notes the survival of 'some of the finest ... monuments of the neo-classical revival'. The former Royal High School, specifically identified in earlier documents, is undoubtedly one of these foremost monuments, and the proposals would have a significantly adverse impact on its setting. The Management Plan recognises the 'dramatic topography' of Calton Hill and its 'collection of nationally important monuments'. It also notes the care taken to maximise 'long views and the picturesque quality of the site' in its original development. The proposals would undoubtedly harm these characteristics, introducing development in an area kept free for the important setting and views of the hill, but also for the architectural impact exploited from the site by the school and its relationship with the monuments on the hill, including the National Monument.

If you require any further information, please contact me.

Yours faithfully

**Steven Robb**

Heritage Management Team Leader, historic Buildings East