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15/03990/LBC & EIA-EDB053

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By E-mail

Planning and Building Standards
City of Edinburgh Council
Waverley Court
4 East Market Street
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Dear Ms Parkes

**Town And Country Planning (Development Management Procedure) (Scotland) Regulations 2013
Proposed Calton Hill Hotel Development - Former Royal High School, 5-7 Regent Road, Edinburgh**

Thank you for your consultation which we received on 7 September. You have consulted us because you believe the development may affect:

- Setting of Category A Listed buildings:
 - Old Royal High School
 - St Andrew's House
 - Regent Terrace
 - Burns' Monument
 - Monuments on Calton Hill
- Setting of Scheduled Monuments: Holyrood Palace, Abbey and Gardens
- New Town Gardens – Historic Gardens/ Designed Landscape – Inventory Site (Calton Hill & Holyrood Palace Gardens & Regent Terrace Gardens)
- Outstanding Universal Value ['OUV'] of Edinburgh Old and New Towns World Heritage Site ['WHS']

In addition this letter responds to the associated Listed Building Consent application (15/03990/LBC) and the Environmental Statement (EIA-EDB053).

We have previously objected to the planning permission affecting some of the above heritage assets because we do not consider it is possible to deliver a hotel of this scale on the site without unacceptable harm to the historic environment (our letter dated 17 September). This letter expands on that response and confirms both that we object to the planning application and that we cannot support the application for listed building consent.

We regard the Royal High School as one of Scotland's most significant buildings. We consider it to be of international significance as one of the world's highlights of Greek Revival architecture, fully the equal of the work of masters such as Leo von Klenze or K F Schinkel in Germany, or William Wilkins or Sir Robert Smirke in England.



We consider that the proposals would, above all, have a significant adverse impact on the integrity, setting and significance of the Royal High School, and on that basis alone we would object to the proposals.

We further consider that the proposals would have an adverse impact on the integrity of Calton Hill, which forms a critical and visually prominent element of The New Town Gardens Inventory designed landscape, and on the setting of the A-listed monuments on the Hill; and of St Andrew's House, sufficient in each case to warrant our objection. As regards the impact on the settings of Holyrood, of the Burns' Monument, and of Regent Terrace, we consider that not to be harmful to the extent that would warrant our objection.

Regarding the World Heritage Site, we dispute strongly the statement within the Heritage Impact Assessment that the present development would have a more beneficial than adverse impact on its OUV. The high significance of the Royal High School to the WHS was highlighted in the first Management Plan, and that degree of importance remains obvious today. We consider that the present proposals would have a significant adverse impact on the school's setting, reducing the building's current prominence and dominance of its carefully conceived site to that of a routine piece of neo-Classical townscape. The proposals would also introduce development in an area kept deliberately free in order to create the important setting and views of the hill, and would intrude on the wider architectural impact exploited from the site by the school and its relationship with major buildings to its west (originally Robert Adam's Bridewell Prison – now St Andrews House) and the monuments on the hill, including the National Monument, the Parthenon to the Royal High School's Propylaea.

We also consider that the assessment presented within the Environmental Statement does not adequately consider the impacts of the proposed development on all aspects of the historic environment, and consequently we have difficulty placing confidence in its conclusions.

With regard to the Listed Building Consent application, we recognise the degree of proposed intervention has been scaled down significantly from what we saw previously. However, there remains a high level of change being proposed, including interventions both inside and on the flanks, demolition of listed buildings, original boundary treatments and the addition of highly over-scaled wings to each end of the main building. The proposed western extension conflicts with Historic Scotland's Guidance, and whilst we have advised previously that we could see scope for a new development east of the main building, the current scale, location, height and prominence of the combined flanking extensions proposed sets them wholly at odds with our previous advice.

We consider this to be an overdevelopment of the site which is harmful to the character and special interest of the listed building and its wider setting, and we are unconvinced that the present scheme represents the only option for the building's future.

I attach as an annex to this letter (i) a more detailed appraisal of the proposals set against the impacts they would have, and (ii) copies of relevant previous

correspondence. Meanwhile, should you wish to discuss anything in this letter further, please feel welcome to contact me.

Yours sincerely

Steven Robb

Heritage Management Team Leader, Historic Buildings

Annex 1 : ROYAL HIGH SCHOOL

Detailed Consideration

Background

Historic Scotland was not involved in, but became aware of the original Council competition process for the building in 2009 after being approached by three of the bidders, and wrote to your Council in November 2009 to discuss approaches to the site. At this stage we repeated advice given during the earlier Museum of Photography discussions which viewed opportunities for new development on the site in three distinct areas.

We considered that the central portion of the site containing the listed Hamilton school building should be subject to minimal change, largely repair and conservation, with any alterations or additions kept to an absolute minimum, and then justified for essential functional need.

The western part of the site, which contained the western playground, lodge and entrance gates, had a more open aspect and provided an important setting for the hill, school and St Andrew's House. We considered that any development in this area would have to be very carefully considered, and later suggested a pavilion structure of around one storey may be possible.

This left the eastern part of the site, which we considered had a more discrete aspect and, although highly visible in long views, we considered it was capable of some development. We later suggested that, provided it was fully justified, and allowed a conservation-based scheme for the remainder of the site, we could accept a case for the loss of the classroom/ gymnasium building, and other ancillary structures here.

Once Duddingston House Properties had been appointed as preferred bidder we followed up with another letter, in March 2010, outlining our strong initial concerns with the emerging proposals by Gareth Hoskins architects. Although, the designs were at a basic concept stage they proposed two, largely glazed, wings with 150 hotel rooms between them, either side of the main listed building. As designs developed we followed up with another letter in June 2010, and following a series of five workshop sessions, provided a more detailed response in October 2014. We have placed these letters as Annex 2.

More recently we attended a design review at Architecture & Design Scotland (A&DS). These meetings were directed towards the design of the hotel only, with the suitability of the proposed use, conservation and demolition works and the quantum of enabling development possible specifically not under discussion. A&DS considered these issues should be examined by other bodies as a pre-requisite to the design review's consideration.

As part of the current application we welcome the work on the historical evolution of the site and its buildings undertaken within the Heritage Statement by Andrew PK Wright, and the other documents produced to assist our consideration of the case.

Planning Permission (15/03989/FUL)

We are now responding in more detail on the specific reasons for our objection to the planning permission application.

The Royal High School and its setting

The international importance of Thomas Hamilton's Royal High School building is undisputed. Arguably the most significant and accomplished Greek Revival building in the UK, it has claims to be amongst the finest on a worldwide stage.

The Royal High School, built between 1825 and 1829 is Hamilton's masterpiece. It is, as the historian Howard Colvin notes 'admirably composed, impeccably detailed and magnificently situated'. More than this it is a skilful adaption of the windowless Greek temple to a modern use, more truthful than many other Revival buildings which often sacrificed authenticity for usability. Hamilton was able to adapt the form of the Propylaea, the gateway building to the Acropolis in Athens, to serve as a similar foil to the National Monument, a replicate Parthenon then being constructed on Calton Hill. Hamilton sourced details from the Temple of Hephaestus (or Theseus) in Athens, further cementing, indeed securing Edinburgh's Enlightenment name as the 'Athens of the North'. This allusion, originally an intellectual description, was carried on to the ideals inherent in the school's educational role. Additionally, the building itself, Scotland's finest classical school, was an early use of the Greek Revival style, a distinct style that would help differentiate the capital Edinburgh (Athens) from the capital London (Rome), and one which, was embraced nationally by Scotland, before being later eclipsed by styles sourced from Scotland's own historical past.

In assessing the setting of the school we have followed our Managing Change in the Historic Environment guidance on setting (Oct 2010). The managing change guidance explains in detail how to apply Scottish Ministers' policies contained in the Scottish Historic Environment Policy (SHEP). Where development is proposed this guidance notes the importance of first identifying the historic asset, then defining its setting, and finally assessing how any new development would impact on this setting.

Hamilton's Royal High School, and its associated pavilions, screen walls, gateways and railings is clearly the principal asset, alongside the less important later buildings covered by the listing, including the gymnasium/classroom block and the lodge.

It is first worth considering the immediate setting of the building itself. Although the main architectural treatment and monumentality of the building is necessarily directed towards the windowless front elevation the secondary elevations echo the 'impeccable' detailing and careful assemblage of details and elevations. This was perhaps inevitable as the main entrance to the building has always been from the rear, the convoluted frontage access only being for limited ceremonial use. Therefore, the rear elevation, visible from many points on the hill, not least the access road, is given a finer elevational treatment than might otherwise be expected, with a central pilastered portico. In addition, the building is approached from the west, and it is the carefully composed and symmetrical west elevation (naturally mirrored on the east) that

provides the visitor with a first view of the building. (This can be seen in Hamilton's elevation drawing on p.34 of Part 1 of the Heritage Statement). Thus, the building must be seen 'in the round' with any interventions to the rear and sides of the site carefully handled so as not to harm the overall setting.

The wider setting of the building is also important. It is prominently situated at the base of Calton Hill with the main elevation facing south, and is visible from many positions across the city, including from the hill. (Many are shown on the illustrated HIA photomontages). The backdrop to the building is the rock, gorse and woodland of the hill itself. The school was originally built on an artificial ledge in the centre of the site flanked by playgrounds with the open background of the hill on both sides. Although the eastern playground was partly developed (initially at a lower level) the western playground has remained comparatively clear, with only single-storey buildings tucked in the lee of the hill's access road. This must be deliberate, and it should be noted that even when the school was looking for extra space to expand the western playground appeared sacrosanct with the importance of the building and its setting here a consideration in the final move to Barnton in 1968. The structures here include the western lodge, a classical homage to the main building by the Edinburgh School Board specialist Robert Wilson, and the original Hamilton gates, piers and railings. Under the proposals both these elements would be demolished, their mutual relationship with the main school lost.

Our Managing Change guidance for extensions (Oct 2010) notes that extensions to listed buildings must protect the character and appearance of the building; should be subordinate in scale and form; should be located on a secondary elevation; and must be designed in a high-quality manner using appropriate materials. Consequently, it is not expected that an extension, or extensions, will dominate a listed building either through scale, materials, location or height. The document also notes that extensions should be sensitive and modestly scaled, skilfully sited, and should generally be lower and set-back behind the principal façade. We do not consider that the current proposals address these key considerations.

The most recent revisions to the bedroom wings have redesigned their form and configuration providing a more 'organic' design with purposely different materials and character. They have sought to draw the upper levels of the wings away from the main Hamilton building, to allow a space for the listed building, and to reduce the effect, from the previous proposals, of a continuous 'wall' or terrace of development from Regent Terrace across the site from east to west. Nevertheless, they are still linked to the main listed building, creating small enclosed courts. Besides the unfortunate linkage through the facade, discussed under the listed building consent, the design and position of the western bedroom wing would almost completely mask and obscure the important and carefully composed western side elevation, currently visible from the western approach and entrance to the site. The new wings and linkage to the listed building would inevitably limit the current understanding and appreciation of the building, currently seen in the round.

The design and changed configuration of the new bedroom wings has actually meant an increase in the height of the building on the western playground to six-storeys, so that it is now a full 10 metres above the side elevations of the Hamilton building, with

the eastern wing over a full storey higher. We consider the former school would become subordinate to its proposed wings rather than the desired opposite.

The change in materials from stone to copper would serve to differentiate the wings from the material of the main building, but numerous storeys of full-height glazing would still have a radical impact by the windowless temple, reflecting the light by day and lit-up by night. The design and height of the new wings would be immediately noticeable, drawing the eye from the more sombre Craighleith clothing of the school.

Conclusion

We consider that both wings, and specifically the six-storey western bedroom wing, would, by their height, scale and massing, dominate and overwhelm the listed building challenging its primacy on the site. The proposals would, if implemented, diminish significantly the building's status as an internationally-acclaimed exemplar of Greek Revival architecture. The harm to the setting and character of the building would be considerable, it being impossible to view and appreciate Hamilton's masterpiece, either by itself or in context, without the oversized extensions taking precedence.

The New Town Gardens Inventory Designed Landscape

The Royal High School is located on the southern flank of Calton Hill, which forms a significant and visually prominent element of The New Town Gardens Inventory designed landscape.

The designed landscape makes an outstanding contribution to the Edinburgh townscape, providing a setting of the surrounding buildings and monuments. The architectural historian Charles McKean described Calton Hill as 'every bit as symbolic a location to Edinburgh as the Castle, and even more carefully crafted for picturesque effect, albeit in classical rather than military garb.' It has outstanding historical, architectural and scenic value as well as outstanding value as a work of art. The Calton Hill Conservation Plan, produced in 1999 by LDN Architects, found that 'Calton Hill, its buildings, monuments, burial grounds and landscape is a Scottish cultural asset of international importance which should be cared for and promoted as such'. It notes that '[the] hill cannot be considered in isolation from the features of the wider hill which create its setting such as the vista along Waterloo Place, Calton Hill Terrace, the whole of the Regent/Royal Terraces and their gardens which provide a wooded continuation of the hill to the east, the London Road and Regent Road roadside gardens, the former Royal High School, St Andrew's House, and Regent Road which creates such an impressive approach to the city'.

We consider the proposals would harm 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. The development of the Calton Hill area was the subject of a competition, and eventually passed to the architect William Playfair to implement. Playfair worked to recommendations of William Stark, an architect well versed in 18th century picturesque theory, which formed the basic principles and ideas for laying out Calton Hill. Stark favoured a less formal or geometric design, taking full account of the topography, and keeping the hilltop free of commercial housing development. As a result the school (and the

surrounding Royal and Regent Terraces) was carefully placed on an artificial terrace, a substantial and costly civil engineering exercise, but one that retained the building's relationship with the topography and base of the hill, evident in the pavilions to the central block following the sweep of the road.

Calton Hill is prominent and visible from a wide range of locations, its monuments giving it emphasis and a characteristic form. The proposed development would have an adverse impact on a series of important views of Calton Hill, and its picturesque composition of landform and monuments. The view from Queens Drive in Holyrood Park, which forms part of the Palace of Holyroodhouse Inventory designed landscape, is illustrated in Viewpoint 13.32. The proposed hotel wings dominate the view and obscure much of hillside of Calton Hill, robbing the school building of its landscape setting and changing the scale of the composition. This visualisation demonstrates that the proposed development would have a significant negative impact on this key view of Calton Hill with its carefully planned relationship of dramatic landform, wooded slopes and imposing buildings.

Conclusion

The proposals would impact on the key characteristics and landscape features of Calton Hill, as well as introducing a development that would harm the established and carefully planned character of the hill. We therefore consider the development would have an adverse impact on the integrity of this part of the Inventory designed landscape.

Setting of other Category A Listed buildings

Our objection is primarily focused on the impact the proposals would have on the Royal High School, but there are other A listed buildings in the vicinity that are affected, by differing degrees, to the proposals.

We consider the impact on the following Category A listed buildings would be sufficient in each case to warrant our objection

St Andrew's House

The development of the western playground with the six-storey hotel wing would adversely affect the setting of the Category A listed St Andrew's House. Designed in 1934, David M Walker notes in, *St Andrew's House – An Edinburgh Controversy 1912-1939*, that the architect (later Sir) Thomas Tait specifically took reference in his Report to the 'monuments on Calton Hill' together with 'particular consideration' being given to the 'architecture of the High School buildings adjoining' He also took care to design a building that would address the Calton Hill, with its 'varied and picturesque monuments forming an ideal background for the new building'. Tait's design was generally agreed to have done so, neither 'overloading the hill or obliterating its fine outline' The new six-storey bedroom wing, which inclines towards St Andrew's House, would reduce the current impact of St Andrew's House against the hill's backdrop introducing a level of development between it and the school. The 'filling in' of this open green space would enforce the 'wall of development' in long views.

Monuments on Calton Hill

The Conservation Plan for the Hill notes that ‘nearly all the major buildings and monuments on the hill were built during this period [early nineteenth century], including the Royal High School and National Monument, and all were built in classical styles that alluded to classicism and reinforced the intellectual link with Athens’. The Royal High School clearly has strong links to the monuments on the hill, particularly the National Monument which was under construction, its completion assumed when Hamilton designed the school. The National Monument was to be a restored version of the Parthenon in Athens, a choice helped by Calton Hill’s visual resemblance (seen by many) to the Acropolis. Therefore, when Hamilton based his design on the Propylaea, the gateway building to the Acropolis in Athens, the link was obvious and intentional.

The relationship between the school building and its picturesque setting by the hill, with its skyline monuments, reproduced in numerous images, would be harmed by the large extensions either side of the listed building. The sheer scale and visibility of the new bedroom wings would immediately draw the eye reducing the former school in stature and prominence, and in particular harming the links between the unfinished Parthenon and its Propylaea.

Although we consider there would be some impact on the following Category A listed buildings it would not be to an extent that would warrant an objection in its own right.

Burns Monument

The Burns Monument was also designed by Thomas Hamilton, and again adopts an Athenian classicism, this time sourced from the Choragic Monument of Lysicrates, which was also the inspiration for the Dugald Stewart Monument on the hill by William Playfair. Views made with both monument and school included were common. The Monument’s current setting against the lower ‘gymnasium’ block would be affected by the increase in scale of the eastern hotel wing but the impact is not considered significant.

Regent Terrace

The proposals introduce a larger block to the western end of the listed Regent Terrace, but the impact would not be significant.

Royal Park

The development is within 800m of a Royal Park. Although the proposed development would likely be visible from the Royal Park, its impact would not be significant.

Holyrood Palace, Abbey and Gardens - Scheduled Monument

The Addendum to Part 3 of the Heritage Impact Assessment images show that the proposed development would be visible from the palace grounds, a scheduled monument, and likely the palace itself, a Category A listed building, but the impact is not considered significant.

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 former school is also within the New Town Conservation Area whose Conservation Area Character Appraisal identifies it as an integral component within the ensemble of monuments and buildings on Calton Hill.

The Inscription Document for the World Heritage site (1995) notes the survival of some of the finest public and commercial monuments of the Neo-classical revival in Europe, reflecting the status of the capital of Scotland as a major centre of thought and learning in the 18th century Age of Enlightenment. The first Management Plan specifically identifies the Royal High School as one of three 'notable public buildings', in the New Town, the others being Register House and the Royal Scottish Academy.

The Royal High school is undoubtedly a key building within the WHS, and the proposals would have a significantly adverse impact on its setting, reducing its current prominence and domination of its carefully conceived site to a subordinate structure to its new bedroom wings.

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 early nineteenth century development.

The proposals would harm these characteristics, introducing development in an area kept deliberately 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 St Andrews House and the monuments on the hill, including the National Monument, the Parthenon to the Royal High School's Propylaea.

Conclusion

Regarding the World Heritage Site, we dispute strongly the statement within the Heritage Impact Assessment that the present development would have a more beneficial than adverse impact on its OUV. We consider the development would have a significant adverse impact on the settings both of the A-listed buildings and of Calton Hill.

Listed Building Consent (15/03990/LBC)

As listed building consent concerns any works that affect the character of a listed building, there are several comments mentioned above that would apply to both planning permission and listed building consent, most notably our strong concerns over the setting of the listed building. In addition, we will comment on the physical interventions to the listed building and the demolition of buildings and structures included within the wider listing.

In our letter of 25 June 2015 we have previously commented on the listed building aspects of the emerging scheme, some elements of which still apply.

The Royal High School (The Hamilton Building)

We welcome the repairs proposed for the main building and recognise there have been revisions made during the design process to respond to concerns over the external treatment of the main listed building. In particular, we welcome the removal of the proposed new staircase from Regent Road, glazed winter gardens, rear porch cochere and additional openings under the portico.

We have previously discussed, and accepted, the general principle for new access openings to the rear of the main hall and the proposed addition of a glazed circulation corridor to ensure the main rooms remain independent. The careful detailing of this corridor will allow the building to remain visible behind. However, the two proposed new openings into each of the two 'dining lounges' from the glazed corridor are of concern. It would seem less damaging to the historic fabric to utilise the immediately adjacent and original existing doorways as lobbies to the spaces instead. As planned, the original doorways are proposed to serve a cleaners' cupboard and as a lobby to a toilet.

Another matter of concern are the links between the listed building and the proposed new wings. We note the additional images showing the detailed treatment, but our strong concerns over the treatment of the listed building remain. Both the side elevations of the Hamilton building are carefully detailed and visible symmetrical facades. The desire to access the façade at two different positions with two different approaches would adversely affect the symmetry of the façade, the lower floor of which would become an internal courtyard with limited external visibility, rather than an important open element of a considered and visible façade. The rear two-storey corridor link would intersect with the façade awkwardly, truncating the Vitruvian window surround and involving the loss of the lower window, fanlight and stonework.

We agree with the heritage statement that the enclosed links to the east and west pavilions are adverse. The accommodation of these elements within the wider development could have been handled more sympathetically. Even though from the south these additions will be largely obscured by the screen wall, filling in the open space here will harm the individuality and separate nature of the pavilions, reducing understanding of these important buildings within the wider site.

As before, we have strong concerns with the proposed access bay at the east of the site off Regent Road. The large slapping in the enclosure wall would entail the loss of the articulated door and its Vitruvian doorpiece, as well as other unwelcome alterations to a carefully considered elevation. We believe a less interventionist alternative could be found.

We note that full access from Regent Road is now discretely proposed by a lift within the left niche reached through a passageway in the bedrock providing access to the floor above. This would appear to be a skilful and creative solution to providing full access without impacting on the ceremonial stairways.

Internally, we welcome the restoration work in the main hall including the restoration of Hamilton's doorpiece in the south wall of the main hall, removed for a marble

alternative in the 1920s – itself removed to Barnton. The opening up of the door is also welcomed but the external balustrade would need to be carefully handled if it is not to be visible. The removal of the PSA balcony extension and restoration of the original stairs to access it are also welcome, as are repairs to the coffered ceiling. We also welcome the deletion of the proposed storm lobby whose design was to ‘complete’ the balcony despite it being originally absent from either end wall. However, the proposed loss of the form and fabric of the school assembly hall, retained in the PSA works, with its ranked tiers of seating and central ‘well’ would be unfortunate. It is a distinctive feature of the original school, noted in the Heritage Statement as ‘well-proportioned’ and ‘memorable’. It was retained and adapted for the proposed Scottish Assembly.

Elsewhere in the building we welcome the reopening of larger volumes in rooms formerly subdivided by the PSA, and any investigation and restoration of original decorative schemes.

Demolition of listed curtilage buildings and structures

The applicants have used SHEP test c.) in order to justify the demolition of the lodge and gymnasium/classroom block, arguing that the loss of both buildings are essential in order to deliver significant benefits to economic growth. In addition the gymnasium block is considered to be of less worthy of listing in its own right. Both buildings were designed in 1885 by Robert Wilson, the Edinburgh School Board architect, with the gymnasium extensively added to in 1894, and are covered by the Category A listing.

In the case of applications for demolition, it is Scottish Ministers’ policy that no listed building should be demolished unless it can be clearly demonstrated that every effort has been made to retain it. In order to justify this test the benefits to the economy would have to be substantial, on at least at a regional level. In addition, the benefits would only be able to be achieved with the loss of the buildings. Your Council may be best placed to judge the economic justification provided, but we have concerns that the need to demolish the buildings is based on this specific scheme and that other less invasive proposals may be able to retain more of the buildings, specifically the lodge and boundary treatments.

Lodge

The western lodge is, all parties agree, in good condition and of architectural and historic merit, contributing to the understanding and evolution of the site at its important entrance. As above, we remain to be convinced that its loss is justified.

Entrance gates, piers, steps and boundary walling

Alongside the later lodge, the proposals involve the loss of Hamilton’s original entrance gates, gatepiers and a substantial run of boundary wall and railings. Elsewhere steps and walling will be lost. Hamilton’s care for attention and detail is evident in the various boundary treatments he employed throughout the site. The applicant notes the importance of the rear boundary wall and belvedere, but we would argue that the very visible and public-facing gatepiers and associated walls and features should be afforded at least the same attention, especially as the new bedroom wing will obscure most views of the restored belvedere.

The loss of these elements, the entire entrance to the site, is most unwelcome.

Gymnasium / Classroom block

We have previously accepted that a case for the demolition and redevelopment of the gymnasium could be made if it enabled a conservation-based solution for the remainder of the site. We still believe a case could be made, but do not consider the current scheme to be either sympathetic or conservation-based.

Conclusion

In conclusion, there are several interventions to the main listed building that are unwelcome, but we understand that for some of these interventions a balance may need to be struck in order to configure a new use successfully. The linking of the listed building to the new bedroom wings would involve particular and permanent harm to Hamilton's considered side elevations. We are also unconvinced that the justification for the demolition of the lodge, gymnasium/ classroom block and boundary treatments has yet been made.

We also have very strong concerns, indeed cannot support, the new wings proposed for the listed building. Their scale, massing and height would dominate and overwhelm the listed building, significantly damaging its character and special interest.

Environmental Statement (EIA-EDB053)

General

It is Historic Scotland's view that the assessment presented within the Environmental Statement does not adequately consider the impacts of the proposed development on all aspects of the historic environment. In addition to this, we have some significant concerns about the quality of assessment presented within Chapter 10 (Historic Environment) and, as such, have difficulty placing confidence in its conclusions.

The layout of the Environmental Statement is very complicated and difficult to follow, with historic environment information and assessment spread across a number of chapters and appendices. Key areas of the assessment are not clearly sign-posted and there is limited cross-referencing throughout the document, leading to an overall confusion of material.

Our understanding is that the main focus of Chapter 10 (Historic Environment) is upon the impact of the proposed development on the listed buildings and archaeology within the development site boundary. Impacts on nearby listed buildings, the World Heritage Site (WHS), the Inventory Designed Landscape and Conservation Areas are assessed as part of Appendix J4 (Heritage Impact Assessment), Appendix J7 (Assessment of Operational Effects) and within Chapter 12 (Townscape).

Our detailed comments on these assessments are as follows:

Chapter 10: Historic Environment

As set out above, the scope of the assessment within the main text of Chapter 10 (Historic Environment) is limited to the impacts of the proposed development on the listed buildings and archaeology within the development site boundary. This is not made immediately clear within the introduction to the chapter, nor is it explained as the chapter progresses.

In addition to the limited scope of the assessment, we have concerns about the adequacy of assessment presented within this Chapter. There are significant missing pieces of information (e.g. criteria to define what constitutes a beneficial impact), and it is also not clear how the assessment criteria which have been set out have been applied throughout. These shortcomings are reflected in the overall structure of the assessment as detailed below.

Assessment Criteria

The assessment criteria presented as part of this assessment are not comprehensive and contain a number of irregularities. Most notably, the assessment criteria presented in Tables 10.2 and 10.4 (Magnitude of Effect) appear to only relate to adverse effects. It is therefore unclear what criteria has been used to arrive at the beneficial effects as set out in the Assessment Summary Matrix (Table 10.8). Without a clear set of criteria for determining beneficial effects, it is difficult to understand the thought processes underpinning the assessment.

Table 10.1 (Sensitivity of Historic Environment Assets to Change) also contains some unclear distinctions. For example, it is not clear from the information provided why assets of both 'very high' and 'high' sensitivity to change must be 'recognisably' of either international or national importance as no explanation has been provided for this. This is not a stipulation which appears in national policy for the historic environment.

Baseline and Assessment of Effects

The baseline information presented as part of this Chapter is also confusingly arranged. Given the large number of heritage designations affecting the site, this assessment does not clearly distinguish between the asset types assessed, nor does it make clear that the main focus of Chapter 10 is on the listed buildings and archaeology within the development site boundary. We would also note that in places this baseline information unusually attaches judgements on the significance of some of the assets, rather than simply outlining the current situation.

Assessment of Sensitivity to Change

There is an overall lack of clarity to the assessment of sensitivity to change as set out in paragraphs 10.7.16 – 10.7.23. This is because the assessment of sensitivity to change does not appear to consistently apply the assessment criteria as set out in section 10.5, but rather appears to be a summary of the more detailed information provided in parts 1 and 2 of Andrew Wright's Heritage Statement (Appendices J2 and J3).

Without a clear understanding of how the assessment criteria have been applied, it is difficult to substantiate the conclusions reached within this part of the assessment.

Potential effects and good environmental management

This section of the Environmental Statement sets out how the applicant considers that the most significant effects of the development have been mitigated by the design of the development and by the provision of a conservation strategy. As noted within our comments above regarding the planning application, we do not agree that the mitigation measures presented here are successful. We also do not consider that such measures would adequately compensate for the impacts of the proposed development.

Assessment of Effects

As stated above, due to gaps in the overall assessment framework, it is difficult to understand how the conclusions presented as part of Table 10.8 (Assessment Summary Matrix) have been reached. We do not agree with the conclusions presented and believe that the harm to and impact on the listed building has been underplayed significantly.

It is not clear, for example, how the conclusion over the beneficial nature of the impact of the demolition of the gymnasium block has been arrived at. It is also not clear how the 'visibility' of the retaining wall and Belvedere Tower will be maintained by the proposed development.

Mitigation and residual impacts

Further mitigation measures are identified in section 10.10. However, regarding the listed buildings, given the mitigation measures amount to a programme of building recording prior to demolition we do not accept that these would mitigate for their loss.

Appendix J4 - Heritage Impact Assessment

Part 3 of Andrew Wright's Heritage Statement contains a Heritage Impact Assessment (HIA) which deals specifically with impacts on the WHS. We note the assessment criteria and methodology used within the HIA. We note that whilst it is stated that there are no major adverse impacts predicted for the WHS that nor are there any major impacts of a beneficial nature. Finally for the HIA, the purpose of table 2 on page 106 is unclear, as our understanding of HIA is that it is not its role to balance impacts.

Appendix J7 – Assessment of Operational Effects

Together with Chapter 12 (Townscape), this appendix assesses the operational impacts of the proposed development on designated historic environment assets. This includes impacts on the Royal High School Building (28), the New Town Gardens Garden and Designed Landscape (32) and The Old and New Towns of Edinburgh WHS (33). This also includes impacts on proximate heritage assets including groups of Listed Buildings, Conservation Areas, Scheduled Monuments and Inventory Designed Landscapes.

We would consider this to be an important aspect of the assessment, the conclusions of which should be summarised in greater depth as part of Chapter 10 (Historic Environment). We would also expect greater cross-referencing between this Appendix and the assessment within Chapter 12 (Townscape).

The assessment provided within this Appendix comprises a number of detached tables which describe the baseline setting of each historic environment asset, and describe the nature of changes that will be caused by the proposed development. We do not believe that the short assessments contained within this Appendix adequately address the impacts of the proposed development on key historic environment designations including the New Town Gardens Garden and Designed Landscape and The Old and New Towns of Edinburgh WHS. However, as discussed above, we note that a Heritage Impact Assessment has been undertaken for WHS matters within a wider Heritage Statement.

While we understand that professional judgement must be applied as part of this assessment, it is not always made clear how the assessment criteria have been applied in support of this. Overall we do not agree with the conclusions presented and believe that the harm caused by operational effects have been underplayed.

Chapter 12: Townscape

While we welcome the inclusion of a townscape assessment into the Environmental Statement as a method of considering the site in relation to the overall urban environment, we do not consider that this sufficiently addresses the impacts of the development on designated historic environment features. This is principally because we do not agree, as claimed within Section 12.3 of this Chapter, that the Old and New Towns of Edinburgh WHS and the Edinburgh New Town Gardens GDL should be considered as 'townscape designations' but rather that they should be considered in terms of their heritage significance.

We would therefore take the view that the methodology employed within Chapter 12 (Townscape) is not applicable to assessing the impacts of the proposed development on historic environment designations as it does not, for instance, seek to integrate historic environment policy or guidance. For these reasons, we also do not consider that the assessment criteria set out as part of this Chapter are applicable.

Conclusion

In summary, there are significant shortcomings to the overall impact assessment on the historic environment as presented within the Environmental Statement. The assessment within Chapter 10 (Historic Environment) is poorly structured and does not adequately consider the impact of the proposed development on key historic environment designations. It is also our view that the assessment presented within this chapter does not adequately measure the impacts of the proposed development on the listed buildings on site. We therefore disagree with the conclusions presented as part of this Chapter.

While we are broadly content with the methodology for the consideration of impacts on the World Heritage Site set out in Appendix J4 (Heritage Impact Assessment), we do not agree with the conclusions presented.

While we would support the inclusion of a Townscape Assessment within the Environmental Statement, we do not agree that this adequately addresses the impacts of the proposed development on important historic environment designations such as the Edinburgh New Town Gardens GDL in terms of their heritage significance. Nor do we agree that the assessments contained in Appendix J7 (Assessment of Operational Effects) sufficiently address the impacts on the Edinburgh New Town Gardens GDL and other proximate heritage assets.

Further consideration

Over the last five years Historic Scotland has taken part in numerous meetings, workshops and design reviews, and as a result of these has given full and consistent advice. Throughout this period we have welcomed the repair of, and long-term viable and sustainable use for, this nationally important listed building. However, we have consistently expressed strong concerns with an approach that attempted to provide a hotel of such scale on the site. Whilst we considered there was scope to redevelop the eastern part of the site, we believed the provision of a large building on the western playground could simply not be achieved without an unacceptably high level of impact on the historic environment.

Whilst welcoming and appreciating the architect's attempt to address concerns with the earlier pre-application proposals, including a far less invasive treatment of the Hamilton building itself, and the recent production of a radically different design approach, the revisions have actually raised the height of the proposed bedroom wings. One of our primary concerns, the development of the western playground, now proposes a building over two full storeys higher than the adjacent listed building.

However, and perhaps crucially, the revisions have left the key issue, the quantum of development on the site, unchanged, with only a very minimal decrease in hotel accommodation (3 bedrooms). For over five years we have questioned the quantum of development required, with discussions on what the site can accommodate without harm to the asset, but any potential solution has been difficult in the face of the applicant's desire to deliver around 150 bedrooms, together with the considerable ancillary accommodation required by a hotel of this scale and nature.

In our last letter of October 2014 we noted that a hotel of the scale outlined could not be delivered without what we regarded to be an unacceptably high level of impact to the historic environment. Although the design approach has been changed considerably since this date, the quantum of development remains the same.

Conclusion

We are committed to achieving the repair and reuse of the former Royal High School, one of Scotland's most significant buildings, and one of extremely few Scottish buildings to be internationally recognised as a masterpiece.

We have previously intimated we would agree the loss of several of the ancillary buildings on the site were that necessary to help accomplish these aims. Whilst this application would likely achieve the repair and reuse of the building, we remain to be satisfied that there are no alternatives to the current scheme that can achieve this without such a level of resultant harm. We have not commented in detail on the proposed use of the building but clearly the choice of a hotel of this scale has led the current design and proposed overdevelopment of the site, whereas other uses presented during the bidding process, or a hotel of less scale may have been possible without the same levels of harm.

We have objected to the planning permission, and cannot support the listed building consent, because we do not consider it is possible to deliver a hotel of this scale on the site. We are convinced that this overdevelopment of the site is significantly harmful to the character and special interest of the listed building and its wider setting, and do not believe that this scheme represents the only option for the future of the Royal High School.

Steven Robb

Heritage Management Team Leader, Historic Buildings
Historic Scotland
30 September 2015

Annex 2

Previous letters regarding the Royal High School

HISTORIC SCOTLAND



Andrew Martindale
Principal Inspector

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Jane Dennyson,
Project Manager,
Strategic Development Partnership,
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Our ref:
Your ref:
26 November 2009

Dear Jane,

The Old Royal High School, Edinburgh.

Thank you for meeting Steven Robb and me, and outlining the current state-of-play with regard evolving bids for the Old Royal High School. We have now had presentations from three of the bidding teams, and wish to make the following observations:

Significance of the site.

The Old Royal High School is a building of iconic importance, both in the Edinburgh context and internationally. As a landmark in the evolution of European neo-classicism Thomas Hamilton's designs of 1825-9 are an acknowledged masterwork, powerfully symbolic in their neo-Grecian perfection of the public role of the High School in the wider city, and an important event in the cityscape of 'modern Athens'.

The site contains other, secondary structures that reflect the evolution of the school subsequent to the construction of Hamilton's building, and changing attitudes to education. While these elements are clearly of lesser importance than the main building, they are in themselves of interest and contribute to the interest of the site. The majority are given statutory protection by individual listing.

In considering proposals that might involve the total or partial demolition of any listed structure it is clearly essential that the City Council gives due weight to national and local policies. It is Scottish Ministers policy, as set



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out in SHEP, that no worthwhile building should be lost unless clearly set out tests can be met; those tests are fully explained within the SHEP.

The wider context.

The Old Royal High School makes an important contribution to the world-renowned appearance of Calton Hill, being seen in many key views both of the hill and the wider historic environment. It is a key building within the Old and New Towns of Edinburgh World Heritage Site.

Alteration and adaptation.

Any scheme of conversion of the Old Royal High School to an alternative use will inevitably involve a level of alteration and adaptation. It is important that all such proposals are considered in the context of the proper understanding of the significance of the building and its fabric, and in line with both national and local historic buildings policy.

The Hamilton building has, in both its elevations and interiors, an obvious hierarchy in its design. This hierarchy invests the principal elevation with the most fully expressed classical order, with freestanding columns, the rear of the central block with attached pilasters, and the end pavilions with an astylar expression of the proportions of the order. While some elevations are more ornamented than others, it is important to consider them all to be of importance, and to respect their particular qualities and massing. Any successful scheme for this building's external alteration or extension will need to show respect for all elevations of this temple-like form, and restrict attachments to a minimum justified by functional need that cannot otherwise be accommodated.

As we have noted in earlier consultation responses, from an examination of the building on site it appears original access from the frontage on Regent Road was always circuitous and possibly only intermittently used for specific ceremonial occasions. The ground level access from the rear would appear to have been the main access into the building. Although we would welcome sympathetic improvements to access, we would be concerned with any improvements to permeability if this encouraged new openings or breaches in the frontage walling, or indeed any visible alteration to the main elevations of this carefully considered design and internationally important building. A major component of the building is the careful and symmetrical grouping of elements, so we consider that symmetry should be added to the analysis of its 'classical power and simplicity'. The architect's original designs and its lack of later external alteration is also worthy of note.



The interior of the building has undergone alteration and adaptation during the course of its history and could evidently accommodate further changes. Such changes should be clearly justified and set against policy criteria. At the heart of the building the Assembly Hall is a stunning space with superlative quality detailing reflecting its central role in the life of the school, subsequently adapted during the 1977-80 conversion for the then proposed Scottish Assembly. Any successful scheme will need to respect the character and form of this space, while bringing it back into beneficial use.

New Build.

Each of the schemes seen by us at this stage has contained a level of new build accommodation within the site. As we indicated in earlier discussions while dealing with the proposed museum of photography, we see the site as breaking down into three areas when considering new-build elements. The central part of the site, containing the Hamilton building, should be seen as an area where new build elements should be kept to an absolute minimum. Any interventions in this area would need the strongest justification, as set out above.

To the west of the Hamilton building the site has an open aspect, with railings defining the site edge and the main entrance marked by gatepiers and a lodge (separately listed). Any new build in this area would have to be very carefully considered, and of the highest quality, to avoid unacceptable impact on the setting of the Old Royal High School, adjoining listed structures (most notably St Andrew's House) and in long views to and from Calton Hill.

The area to the east of the Hamilton building has a much more discrete aspect, although it remains highly visible in long views to and from Calton Hill. In the past we have indicated that we would accept a level of development in this area, if justified against national policy criteria and viability arguments concerning the whole site.

Any new build elements of a proposed redevelopment must respect the current character of the site and the surrounding area, and must not dominate the existing listed buildings, either in their immediate context or in longer views. Impact on the wider World Heritage Site is obviously a critical issue. Massing, scale and materials will require the closest scrutiny to ensure that any new build elements make a positive contribution to the historic environment while respecting the character and appearance of the Royal High School site and the wider city.



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Conclusions

While welcoming the principle of reuse of the Old Royal High School site, we must emphasise the need for any development proposal to respect the existing structures on the site and their wider setting. To be successful, any alterations or additions to the Hamilton building must be minimally scaled, discrete, clearly differentiated from the original and justified by absolute functional need. Any new build elements will need to be appropriately scaled and of the finest architectural quality commensurate with the prominence of their setting. Any demolition on the site will need to be fully justified against the tests set out in SHEP.

I trust that these observations are of assistance in your ongoing procurement process, and apologise for the delay in our reply. Please contact Steven or me if you wish to discuss any of the issues raised in this letter.

Yours sincerely,

Andrew Martindale,
Principal Inspector.



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Steven Robb
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Alastair Ross
Property Management and Development
City of Edinburgh Council
Waverley Court Business Centre
EDINBURGH EH8 8BG

Our ref: HGG/A/LA/1749
Your ref: 5 March 2010

Dear Mr Ross

The former Royal High School, Regent Road, Edinburgh

I understand that you have recently been appointed project manager for the delivery team taking forward proposals for the above building.

Background

We made comments on the development brief for the site in 2008 and, following the open bidding process, met with three of the potential bidders in late 2009. We then outlined our initial comments in a letter of 26 November 2009 to Jane Dennyson at your Council. We now understand that Duddingston House Properties Ltd. (DHP) have been confirmed as your Council's preferred partner and that the design and commercial aspects of the bid are now being taken forward.

We understand that the detailed drawings for the site are still at a basic concept development stage and still confidential, but we are conscious that our comments so far were generic to all three schemes we had previously seen. We would therefore, at this stage, like to express our strong initial concerns with the emerging designs we have seen for DHP's hotel scheme by Gareth Hoskins architects.

The building

The former Royal High School is a Category A-listed building within the New Town Conservation Area and Old and New Towns of Edinburgh World Heritage Site. It was designed by Thomas Hamilton in 1825-9, and is acknowledged as an internationally important landmark in the evolution of European Neo-Classicism. It is perhaps the finest neo-classical building in the country, and plays an important role in Edinburgh's description as the Modern Athens.



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Previous advice

To recap, our advice in November last year suggested that any works of adaptation and alteration of the former school building would have to be undertaken with a full understanding of the building's significance, and in line with both national and local historic buildings policy. We further noted the main building's design was carefully considered on all elevations and that any external alteration or addition would need to take account of its temple-like form.

The early proposals from Gareth Hoskins show that it is proposed to insert a new entrance at the upper level of the rear of the school building, itself a composed pedimented elevation, entered from the Calton Road level. We would have strong concerns with how such an approach could be handled without harm to the building.

The interior, although altered in 1977-80 to accommodate the proposed Scottish Assembly, still contains elements of Hamilton's design, in particular the former oval school assembly hall, adapted to form a debating chamber. Reusing the space whilst respecting its character and form will be an essential element in any successful scheme.

Regarding the new build elements proposed for the site, our letter of last year, took reference from previous discussions over the proposed museum of photography, where we suggested that the site can be viewed as three separate areas. In the central part of the site, containing the former school, we consider that any new build should be kept to an absolute minimum, with any interventions requiring the strongest justification.

The area to the west of the main school building has an open aspect, with railings (finishing its edge, and the main entrance marked by gatepiers and a lodge (separately listed). There is also a mid C20th classroom building of limited interest to the east of the lodge. Any new build in this area would have to be very carefully considered, and of the highest quality, to avoid an unacceptable impact on the setting of the main school building, adjoining listed structures (most notably the Category A listed St Andrew's House), and in long views to and from Calton Hill. The area to the east of the main school building has a much more discrete aspect, although it remains highly visible in long views to and from Calton Hill. In the past we have indicated that we would accept a level of development in this area, if justified against national policy criteria and viability arguments concerning the whole site.

Emerging proposals

The emerging proposals contain two wings or pavilions on either side of the main school building. These will contain the 150 hotel rooms within a largely glazed envelope. The scale, height and siting of these wings will adversely affect the setting of the main building, in particular blocking views of it from the west. The detailed design of the pavilions would also provide a large expanse of glazed façade either side of the main building. These facades would be immediately visible in long views of the building, clashing with the masonry school against the 'green' backdrop of the Calton Hill.



As a Category A listed building Historic Scotland would be consulted by your City Council on any applications affecting the building, including planning applications affecting the setting of the building. We understand that your Council would remain owners of the building but the application would be made by Duddingston House Properties Ltd. Historic Scotland would therefore require to be notified before listed building consent could be granted.

At this stage we would be unable to support the proposed scheme. We look forward to meeting with you in the near future to discuss a way forward for the scheme.

Yours sincerely

Steven Robb

cc Gareth Hoskins architects

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 Property Management and Development
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Our ref: HGG/A/LA/1749
 Your ref: 30 June 2010

Dear Mr Ross

The former Royal High School, Regent Road, Edinburgh

As requested, following our meeting earlier this month, I can now provide the following comments on the emerging proposals at the former Royal High School prepared by Gareth Hoskins Architects.

The former Royal High School is a Category A-listed building within the New Town Conservation Area and Old and New Towns of Edinburgh World Heritage Site. It was designed by Thomas Hamilton in 1825-9, and is acknowledged as an internationally important landmark in the evolution of European Neo-Classicism, and is perhaps the finest neo-classical building in the country.

We understand the proposals are still at a conceptual stage and that many details are as yet unresolved. Within that context, the emerging scheme involves the demolition of the former classroom (gymnasium) block to the NE and two twentieth century buildings of limited interest either side of the main school. The main building would be converted to hotel use with the addition of two symmetrical three/four storey wings or pavilions to its east and west. These pavilions will contain 150 hotel rooms within a largely glazed envelope on a stone base. Tentative new entrances to the main building from the north and south have been proposed.

The proposals for the main listed building show a new high level entrance from the Calton Hill access road. Internally there appear to be major alterations proposed to the oval assembly hall and openings to the southern façade and boundary wall. We would have strong concerns that such interventions could not be handled without harm to the special interest of the listed building.

Regarding new development on the site, we would have strong concerns with any major development on the western part of the site. Any significant scale, mass or height here may adversely affect the setting of the main building, in particular blocking views of it from the west and affecting its relationship with the lodge, St. Andrew's House and the Calton Hill. It would also be highly visible in long views, primarily from the south and west.



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Separately, we believe there may well be scope to replace the former classroom buildings to the east but must emphasise that their demolition needs to be justified as part of an overall scheme whose viability depended on their replacement. Any development would also have to take account of both the immediate setting of the main listed building and long views.

Although, despite the topography, the current building is symmetrical we do not consider that any new scheme need follow this symmetry. A scheme that concentrated development on the eastern part of the site whilst restricting development on the western part of the site is likely to be more successful. Materials will also be an issue with large amounts of glazing likely to be immediately visible in long views of the building, clashing with the masonry school in its current setting against the 'green' backdrop of the Calton Hill.

Whilst welcoming a long term viable reuse of this nationally important building, and seeing scope for development on the site, we would like to express our strong initial concerns with the emerging concept. While we feel unable to support the scheme in its current form we do look forward to discussing a way forward that addresses these concerns and helps secure a sustainable future for the building.

Yours sincerely



Steven Robb



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Our ref: HGG/A/LA/1749
Our Case ID: 201404698
24 October 2014

By E-mail
Head of Planning and Building Standards
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4 East Market Street
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David.leslie@edinburgh.gov.uk

Dear David

The Former Royal High School, Regent Road, Edinburgh

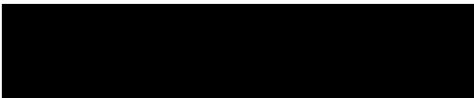
I am writing to you following the five recent workshop sessions facilitated by Duddingston House Properties.

In the course of the workshops we have commented at some length on the approach being taken towards the site. Whilst welcoming the opportunity to be involved in discussions, we remain disappointed that key elements of potential debate have not been fully considered, most significantly the quantum of development achievable on the site. From our earliest involvement we have highlighted this as a critical element, yet discussions at the workshops have been restricted to variations of the same level of development, not the consideration of wider options.

Any successful development of the former Royal High School site will need to respect the interest and importance of the internationally important listed building while also preserving the wider conservation area and the Outstanding Universal Value of the World Heritage Site designation. To date the workshop series has been successful in clarifying to us that an hotel of the scale and ambition outlined cannot be achieved on this site without what we would regard an unacceptably high level of impact on the historic environment. I attach our detailed consideration of these issues as an annex to this letter.

We remain committed to working with your Council to achieve the repair and reuse of what is one of Edinburgh and Scotland's finest buildings. We continue to believe that the building offers great opportunities for sensitive reuse and adaptation.

Yours sincerely



Andrew Martindale
Head of East Team





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Annex

Detailed consideration:

DESIGNATIONS AND CONTEXT

The former Royal High School is a Category A-listed building of outstanding architectural, cultural, aesthetic and social significance. The Thomas Hamilton main building, constructed 1825-9, is recognised internationally as a masterpiece of the Greek Revival.

The principal block of the Royal High School is highly unusual. The portico and flanking colonnaded elevations are both rigorous and austere in their design, most notably in the absence of a direct access to the portico, and by being almost entirely un-fenestrated. The success of the building, and its outstanding importance to the Greek Revival movement, lies in Hamilton's adaptation of the windowless Greek temple to a modern use. The resultant architectural impact is enhanced by the flanking walls, pavilions and secondary elements, which combine to produce one of the architectural high-points of the 'Athens of the North'. While lacking the austere monumentality of the main façade, the secondary elevations are also meticulously detailed and very carefully thought out.

The architectural impact, and cultural significance, of the principal building has been confirmed by Andrew PK Wright in his initial assessment exercise, presented to the workshops as part of his work commissioned by the developers. This work has been of considerable value to the Workshop process, and we look forward to seeing the completed report that will hopefully result from it.

Secondary Buildings

As noted above, the Former Royal High School is a Category A listed building. While much of the outstanding interest and significance arises from the Thomas Hamilton main building, secondary buildings on the site are covered by the listing and have an interest which must be acknowledged, and understood, before the scheme is developed further. We have not, to date, seen any detailed assessment of these structures, and await Andrew Wright's report with interest.

Conservation Area

Located on the north east edge of the boundary of the New Town Conservation Area, the former Royal High School is identified in the Conservation Area Character Appraisal as an integral component within the collection of monuments and buildings that punctuate the backdrop of Calton Hill. Set on the southern slope of Calton Hill, its value to the conservation area is particularly strong in regard to its contribution to townscape and skyline, particularly when viewed from across the Waverley Valley from the Old Town.



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Gardens and Designed Landscape

Calton Hill forms part of the designation for the New Town Gardens which are recognised as nationally important by their inclusion on the *Inventory of Gardens and Designed Landscapes*. The gardens are outstanding for the contribution they make to the Edinburgh townscape, and in providing a setting for the surrounding buildings and monuments. The entry on the *Inventory* regarding Calton Hill is headlined by a quote by the architectural historian Charles McKean:

Every bit as symbolic a location to Edinburgh as the Castle, and even more carefully crafted for picturesque effect, albeit in classical rather than military garb.

Furthermore, the entry notes 'Calton Hill, a public open space, is visible from a wide range of locations, its monuments give it emphasis and a characteristic form'.

World Heritage Site

The 1995 Old Town and New Town of Edinburgh World Heritage Inscription document specifically notes the importance of the former Royal High School, particularly in terms of its contribution to Townscape and Built Heritage:

The New Town is most noteworthy for its planned ensembles rather than individual buildings, however, there are a number of notable public buildings, including the Royal High School, and the monuments on Calton Hill.

The recently published World Heritage Management Plan summarises the significance and identity of Calton Hill as:

with its collection of nationally important monuments, it is the classical alternative to the gothic citadel of the castle.

The Management Plan acknowledges and defines one of the main objectives outside the World Heritage boundary being to protect the iconic skyline, key views in and out of the site, as well as its setting. Calton Hill, with its dramatic topography and collection of buildings and monuments, is identified as one such key view, with particular vulnerability in terms of skyline. Any proposal for intervention within this sensitive setting must demonstrate that it takes account of the contribution this site makes to the Outstanding Universal Value of the World Heritage Site.

CONSIDERATION OF IMPACT OF NEW BUILD PROPOSALS

The following comments are based on the scheme presented by Gareth Hoskins at the Fifth Workshop.

Whilst of course acknowledging that that scheme is in no way a fully developed one, we hope the comments we offer in response to it may assist further design



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development, as we believe them pertinent to the consideration of any development on the site.

On the Listed Buildings

The setting of Hamilton's building has evolved, and is today notably different from its original context. The character of the site to the west of the main building, where it has remained largely open, is markedly different from its east side, where the majority of secondary development of the site has occurred, most significantly with the 'Gymnasium block', which contained additional classrooms as well as a gym. The east part of the site is also more effectively screened by planting between the roadway and screen walls. Regent Terrace also provides an immediately adjacent built form.

The contrasting nature of the flanking elements of the site led us to identify differing potential for development in both our 2009 and 2010 letters.

In our view the western area is unlikely to be able to accommodate substantial new buildings without unacceptable detriment to the historic interest of the site, and the wider area.

Our 2009 and 2010 letters not only indicated that buildings on the site to the east might be lost, but we have already stated that a good quality design solution for the entire site, and accommodating a new large-scale block, would enable us to accept a case for loss.

In the course of the workshop process Gareth Hoskins Architects have explored a range of options for new accommodation blocks. Following extensive testing of these options their preferred scheme has returned to one that reflects a similar mass and scale to that advised against by us in 2010.

This new 'notionally symmetrical' scheme has the benefit over the previous proposals of a greater separation at upper levels of the wings from the Hamilton block, which would allow clear space in some views either side of the main building. While this is clearly an improvement, we remain strongly concerned about appearances of bulk and massing in longer views (addressed below), and the scale of building on the western playground.

The addition of 'symmetrical' wings of considerable size either side of the main listed building would also have an unwelcome effect on the immediate setting of the listed building. As well as obscuring many elements of the building from immediate view, including the return (side) elevations, the wings would significantly reduce the impact and primacy of the listed building on the site. In dealing with extensions to listed buildings the focus should be on keeping any additions required subordinate to the main building. In this case it would be difficult to fully distinguish the central listed building from much of its immediate setting. We also note that little or no justification for the joining of the extensions across the full width of the side elevations has been given.



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On the Conservation Area and wider setting

As noted above, the Former Royal High School forms a key element in the New Town Conservation Area and the *Inventory* Landscape. As part of the Calton Hill group of monumental buildings it is important to consider the impact of development in city-wide views.

Since the outset of discussions, we have raised concerns that development on the western playground might have an excessive impact on the wider historic environment, while development of the eastern side of the site may be possible without undue impact. The extensive design development has confirmed that initial view for us.

If the western playground was to be developed to the extent currently shown on the architect's scheme the impact on long views of the site would be unacceptable in historic environment terms. Development of this sort would break the important visual link between the open space of Calton Hill above and behind the Former Royal High School site, and the lower slopes. In effect development of this form would continue the 'wall' of development of the Calton Hill terraces across a site deliberately left open to increase the architectural and monumental impact of the Hamilton building.

On the World Heritage Site

The inscription of the Old and New Towns of Edinburgh World Heritage Site recognises specifically the former Royal High School as a key attribute to the Outstanding Universal Value of the World Heritage Site. Any development that results in significant adverse impacts on the building, therefore, has the potential to negatively impact on the Outstanding Universal Value of the World Heritage Site. This would require very clear grounds for allowing such impacts.

WORKS PROPOSED TO THE LISTED BUILDING

Any proposal for major works to a listed building need to be put fully into context by a proper understanding of its history and significance. We await sight of Andrew PK Wright's full assessment of the Former Royal High School, but as noted above the discussions to date have benefited from his presentations of initial findings, and response to areas of discussion.

As with other major historic buildings, the former Royal High School has been altered over the years, particularly during the works carried out by the PSA to convert it as a potential Scottish Assembly. In developing a sustainable new use, further alterations are likely to be achievable, while respecting the character and significance of the historic building.

Steps and access

A considerable portion of the discussions in the Workshops has focussed on access to the main portico. At present there is no obvious route from Regent Road to the main floor of the building, but rather, complex routes from two entrances that flank the central composition of blank walls and railings.



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SCOTLAND



Homecoming Scotland
2014



GLENCAIGLES
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HISTORIC SCOTLAND
ALBA AOSMHOR

Historically it is clear that access from the portico to the roadway was not a functional requirement of the school; in fact the schoolboys only accessed the portico once, on their leaving day, from the main hall. Day-to-day access was achieved from the side and rear of the building. In his architectural treatment of the principal elevation, Hamilton celebrated this unusual use pattern. His portico therefore gains a virtually unique place in Scottish neo-Greek architecture in not having any obvious main access.

The workshops have explored ways in which everyday access for hotel use could be achieved from the roadway to the portico, while accepting that a level main entrance, almost certainly to the rear, will also need to be provided for drop off and accessibility reasons.

To date we have not seen an option tabled which would meet the requirements of hotel operators while sufficiently respecting the interest and importance of the existing building. As we have made clear in the workshops, to simply replace the existing walls and railings with a single flight of steps would be unlikely to find favour on historic buildings grounds, both in terms of amount of fabric lost, and also the radical alteration to the character and design intent of the principal element of the main elevation of the listed building. There may, however, by internal remodelling, be a more directly accessible route possible, accessed from the existing flanking entrance gateways on Regent Road. We would be happy to discuss any proposals to address this more fully.

Alterations to the principal elevation

As noted above, much of the considerable architectural presence of the main elevation of the former Royal High School comes from the largely un-windowed elevation of the central block and colonnaded wings.

In proposing windows and glazed conservatory-type extensions on these areas the architects do not appear to have accepted the full significance of these elevations. The work that Andrew PK Wright has been carrying out may assist in consideration of this, but at this point in discussions we would highlight that it is our understanding that these blank areas of elevation are of great importance to the integrity and significance of the building, and that the introduction of such elements is unlikely to be achievable without impact on the special interest of the building.

Side and rear elevations

The secondary elevations are of considerable architectural presence, and benefit from the fine detailing and exceptional quality ashlar stonework of the main elevation. They are, nonetheless, secondary, and more likely able to accommodate alterations, such as the proposed glazed linking elements proposed for the rear, without undue impact on the significance of the site.

Interiors

Much of the fabric (and considerable areas of the floorplan) of the interiors of the building have been altered or replaced in the works carried out by the PSA. In light of this, and their resulting lesser interest, we have encouraged the developers to



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consider alterations where these might be achieved without significant impact on the building, such as within the side wings. These areas, as well as being more readily adaptable, also have the benefit of regular fenestration.



