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Our ref: HGG/A/LA/1749
Our Case ID: 201606210
Your ref: 17/00587/LBC
17/00588/FUL

24 March 2017

Dear Sirs

[Planning \(Listed Buildings and Conservation Areas\) \(Scotland\) Act 1997](#)
[The Environmental Impact Assessment \(Scotland\) Regulations 2011](#)
[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 (17/00588/FUL) which we received on 24 February 2017. You have consulted us because you believe the development may affect:

- Outstanding Universal Value ['OUV'] of Edinburgh Old and New Towns World Heritage Site ['WHS']
- Setting of Category A Listed buildings:
 - Old Royal High School
 - St Andrew's House
 - Monuments on Calton Hill
 - Burns' Monument
 - Regent Terrace
- Garden or designed landscape on the Inventory:
 - The New Town Gardens
 - Palace Of Holyroodhouse
- Setting of Scheduled Monuments: Holyrood Palace, Abbey and Gardens
- Development of land within 800m of a Royal Palace or Park

You have also consulted us on the Environmental Statement ('ES') under the Environmental Impact Assessment (Scotland) Regulations 2011, and on the Listed Building Consent ('LBC') application (17/00587/LBC).

This letter summarises our responses to the three consultations ([Planning application](#); [Environmental Impact Assessment](#); [Listed Building Consent](#)). The attached [annex](#) gives our detailed comments under the three consultation titles.

We consider that the development proposals, to extend the main listed building with two flanking wings, would have a significant adverse impact on the Outstanding Universal Value ('OUV') of the World Heritage Site ('WHS'). We consider that the proposals would also have a significant adverse impact on the special interest and setting of the Category A listed Royal High School and on the setting of the Category A listed St Andrew's House, National Monument, and Nelson Monument. We also consider the proposals would have a significant adverse impact on the New Town Gardens Inventory designed landscape. We consider that the demolition of the listed lodge and gymnasium buildings on the site has not been justified.

Therefore, on all of the above grounds, we **object** to both the applications for planning permission and listed building consent.

Planning Application

World Heritage Site

We object to the proposals on the grounds they would have a significant adverse impact on the OUV of the World Heritage Site. The former Royal High School ('the Hamilton building') is a highly significant building within the World Heritage Site, one of the world-class neo-classical buildings mentioned in the Statement of Outstanding Universal Value for the WHS. Its site represents one of the clearest manifestations of the important juxtaposition between the 'dramatic topography' of the Old Town and the 'planned alignments of key buildings' within the New Town.

We consider that the present proposals would have a significant adverse impact on the school's setting and its relationship to Calton Hill. The flanking extensions would diminish the importance of this internationally important building, introducing an urban context to this landscape-based extension of the New Town.

The former school has a symbolic relationship with the monuments on the hill, especially the National Monument, the Parthenon to the Royal High School's Propylaea. The proposals would impact adversely on this relationship, a key cultural element in Edinburgh's creation of an Athenian cityscape.

Our further comments are given in the [relevant section](#) of the attached annex.

Royal High School

We object to the planning application. The application concerns works to the Category A listed buildings and their settings. In assessing the planning application we have used our [Managing Change in the Historic Environment Guidance Notes](#), primarily our 'Setting' guidance.

We have assessed the current settings of the A-listed buildings, and the impact of the proposed development on those settings. Whilst we can see scope for some development within the eastern portion of the site, we consider that the site cannot accommodate a large building in the western part of the site. The scale, location, height and prominence of the proposed flanking extensions, especially the western

extension, would dominate the Hamilton building, fundamentally affecting our ability to appreciate and understand it, and removing its current primacy on the site. It would also detach the Hamilton building from its important landscape setting against the backdrop of the Calton Hill.

Our further comments are given in the [relevant section](#) of the attached annex.

Other category A listed buildings

We object to the impact of the proposals on the setting of the Nelson Monument, the National Monument, and St Andrew's House.

Whilst there would be an impact on the settings of Holyrood Palace, the Burns' Monument, and Regent Terrace, we consider that these impacts would not be harmful to the extent we would object.

Our further comments are given in the [relevant section](#) of the attached annex.

Gardens and Designed Landscapes

We object to the development on the grounds that the proposals would have a significant adverse impact on the features, character and a series of views of Calton Hill, a critical and visually prominent element of the New Town Gardens Inventory designed landscape.

We do not object to the proposals' impact on the Palace of Holyroodhouse Inventory designed landscape.

Our further comments are given in the [relevant section](#) of the attached annex.

Setting of Scheduled Monuments: Holyrood Palace, Abbey and Gardens

We do not consider the impact of the development on this asset would be significant. Our further comments are given in the [relevant section](#) of the attached annex.

Development of land within 800m of a Royal Palace or Park

We do not consider the impact of the development on this asset would be significant. Our further comments are given in the [relevant section](#) of the attached annex.

Environmental Impact Assessment

We consider that there are a number of shortcomings in the assessment as set out in the Environmental Statement. Primarily this is in terms of the historic environment baseline and the level of sensitivity to change of certain category A listed buildings within the planning application boundary. In addition, the rationale underpinning the application of the assessment criteria is at times difficult to follow.

Consequently, we have difficulty placing confidence in its conclusions. Further comments on the Environmental Statement are included in the [attached annex](#).

Listed Building Consent

We object to the listed building consent application. Listed Building Consent concerns works that affect the character and special interest of the listed building(s). There is a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting. We have used our *Managing Change Guidance: Extensions* (October 2010) to assess the bedroom wing extensions and our Demolition guidance to assess the demolition of ancillary listed buildings.

On balance, we are broadly content with the proposals for the internal conversion of the Hamilton building. However, we consider that the flanking extensions, in particular the western extension, would be significantly harmful to the character and special interest of the Hamilton building and its setting. They would destroy the current primacy of the listed building on its important site, making it subordinate to two taller wings.

We also consider that the proposed demolition of the Category A listed lodge and gymnasium on the site has not been fully justified.

In our overall assessment of the impact of the proposals on the special interest of the listed building, we consider less harmful schemes, that could achieve the reuse of the main building, are possible.

Our further comments are included in the [relevant section](#) of the attached annex.

Conclusion

The former Royal High School is one of Scotland's most important historic buildings. As an example of Greek Revival architecture it is not only one of the most significant and accomplished buildings in the UK, it has a clear international significance within a worldwide context.

We consider the proposals would have a significant adverse impact on the OUV of the World Heritage Site. They would introduce considerable new development either side of the internationally important building, adversely affecting the sensitive site and its established landscape setting and relationship with Calton Hill, itself part of an Inventory landscape.

The magnitude, location and height of the flanking hotel extensions fail to take account of the building's significance and represent an overdevelopment of the site. They would, if implemented, be significantly harmful to the character and special interest of the A-listed Royal High School building and its setting. We would no longer be able to appreciate and understand the building in the same way.

We have consistently noted that we do not consider it is possible to deliver a hotel of this scale on this site without unacceptable harm to the historic environment.

We also consider that there may be other less harmful options that would both safeguard the future of the building and preserve its important setting.

We attach as an annex to this letter our more detailed observations. This includes comments on the three consultations, and 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
Deputy Head of Casework

ANNEX

This annex sets out our comments on the three consultations, as listed above. Below is a linked table of contents, for ease of navigation.

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GENERAL

In this section of the annex, we have included information which is relevant to all three consultation responses ([Planning Application](#), [Environmental Impact Assessment](#), and [Listed Building Consent](#)) which form the other sections of this annex.

Historic Environment Scotland, and our predecessor body, Historic Scotland, has given advice over a number of years on proposed development in this location. Our previous involvement is summarised [below](#).

This section also includes [information on the Royal High School](#), the [policy background](#) to our involvement and comments, and a summary of the [development proposals and the heritage assets](#) that they would impact.

Background

We were involved in this case as our predecessor organisation, Historic Scotland ('HS'), after we became aware in 2009 of the original Council competition process for the Royal High School. This was after being approached directly by three of the bidders. We were not at that time involved in the case, but we wrote to your Council in [November 2009](#) to discuss approaches to the site. At that 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, and largely to 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 that western area would have to be very carefully considered, and later suggested (including at the 2015 workshop sessions) a pavilion structure of around one storey as a possibility. 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 implemented as part of an otherwise conservation-based scheme for the remainder of the site, an acceptable case could be made for the loss of the gymnasium building, and other ancillary structures here. We did not agree that any development on the site had to be symmetrical or notionally symmetrical by duplicating new structures either side of the Hamilton building.

Once Duddingston House Properties (DHP) had been appointed as preferred bidder we followed up with another letter, in [March 2010](#), outlining 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 providing 150 hotel rooms in total, flanking the Hamilton 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](#),

setting out clearly the concerns over the potential the proposals would have on the Hamilton building in particular. In the course of the discussions there was a failure to address, or agree on, the quantum of development the site could accommodate, especially regarding proposed development on the western playground. We have placed these letters within the annex.

We thereafter attended a Design Review at Architecture & Design Scotland (A&DS). This involved several meetings and 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, expressly not under discussion. A&DS specifically considered these latter issues should be examined by other bodies as a pre-requisite to the design review's consideration.

The applications (15/03989/FUL) and (15/03990/LBC) were submitted on 31 August 2015. We welcomed 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.

On 30 September 2015, our predecessor organisation, Historic Scotland, objected to the application for planning permission and noted it could not support the listed building consent application. The planning and listed building consent applications were then refused by your Council at the meeting of the Development Management Sub-Committee on December 17th 2015.

Following this, in February 2016, we attended a series of meetings with your Council and the developer's agents. At these discussions, a 'Statement of pre-application planning advice – Massing Analysis –Royal High School', drawn up by your Council, was considered. This was intended as pre-application advice to guide design proposals for the site and its potential to accommodate new buildings. Following the failure to agree a way forward on the quantum of development at the workshop sessions, the Massing Analysis document could be viewed as a culmination of views on what quantum of development the site could accommodate without harm to the primary asset on the site; the Hamilton building. The document notes that the 'volumetric information is not intended to illustrate a form that can be filled: rather its intention is to show a physical envelope within which a design can emerge'. We agreed with the approaches outlined in that document, which included development envelopes in the west playground being confined to one storey at the rear of the site, and the eastern playground to a similar height to the existing gymnasium building.

That process came to an end when the appeal was submitted on 17 March 2016.

We attended a presentation on the current revised scheme at the Edinburgh Urban Design Panel in November 2016. The Panel found that the proposed extensions were not subordinate to the Hamilton building, and that they would overwhelm the listed building, and that the scheme was consequently in conflict with the brief. The Panel considered the revised scheme was incompatible with the fundamental characteristics of the internationally important and unique site, and that the Panel could not support the principle of the development.

The importance of the Royal High School

The international importance of architect Thomas Hamilton's Royal High School building is undisputed. We regard the building as one of Scotland's most significant buildings and consider it to be, arguably, the most significant and accomplished Greek Revival building in the UK. It also has claims to be amongst the finest Greek Revival buildings in a worldwide context, fully the equal of the work of Leo von Klenze or K F Schinkel in Germany, or William Wilkins or Sir Robert Smirke in England.

Built between 1825 and 1829, the school is Hamilton's masterpiece. It is, as the historian Howard Colvin noted, '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 Greek 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. There is evidence the two designs were progressed in tandem to assist with the creation of a Scottish Acropolis. Hamilton sourced details from the Temple of Hephaestus (or Theseus) in Athens, with the completed building further cementing, indeed securing, Edinburgh's Enlightenment name as the 'Athens of the North'. This allusion, originally a largely intellectual description, would be carried on to the ideals inherent in the school's educational role.

Architecturally, the Royal High School is the greatest of a series of Greek Revival buildings that helped Edinburgh achieve its notable Athenian cityscape in the early nineteenth century. Charles McKean has described these buildings as 'incomparably splendid'. The Greek Revival style helped differentiate the cultural capital Edinburgh (Athens) from the Imperial capital London (Rome); and the style was embraced nationally by Scotland (especially for schools) before being later eclipsed by styles sourced from Scotland's own historical past.

Policy background

Section 59 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1997 states that 'In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

Section 14 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1997 states that 'In considering whether to grant listed building consent for any works, the planning authority or the Secretary of State (now Scottish Ministers)', as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

In considering the present applications we have used HESPS ([Historic Environment Scotland Policy Statement – June 2016](#)). This document replaced Scottish Historic Environment Policy (SHEP) for operational matters and provides detailed advice on how high-level policies contained in SPP ([Scottish Planning Policy](#)) should be applied in practice. SPP sets out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. HESPS is a material consideration in the Scottish Planning system.

We have also used our [Managing Change in the Historic Environment guidance](#). This is non-statutory guidance that explains in more detail how to apply policies contained in SPP. These documents include more detailed information and guidance on consideration of the historic environment within the planning process. The guidance notes are used to inform local authority planning policies and the determination of applications.

Proposals and Designations

The former Royal High School site is contained within the Old and New Towns of Edinburgh World Heritage site, the New Town Conservation Area, and it lies within the New Town Gardens Inventory designed landscape. It contains several Category A listed buildings including the original High School building designed by Thomas Hamilton in 1825-9, its pavilions, boundary walling and gates (the Hamilton Building). The site also contains two later C19th buildings, the Lodge and Gymnasium building, and two C20th buildings, a classroom block and luncheon block both built before 1948. Your Council has confirmed that all the buildings on the site are Category A listed, either by inclusion within the list description (Hamilton building, lodge and gymnasium) or listed by curtilage as pre-1948 buildings.

There are other Category A listed buildings within the vicinity of the former Royal High School site, including St Andrew's House, various monuments on Calton Hill, the Burns' Monument and Regent Terrace. The site is also in the vicinity of the Palace Of Holyroodhouse Inventory designed landscape and within 800m of the Royal Palace and Park. Finally, the site is in the vicinity of a Scheduled Monument, Holyrood Palace, Abbey and Gardens.

The development proposals comprise the conversion of the Hamilton Building to serve as a hotel. This involves its extension with two linked flanking five- and six-storey wings containing 127 bedrooms and ancillary hotel accommodation including conference, banqueting and spa space. The application involves the loss of railings, steps and boundary walling associated with the Hamilton building, and also involves the demolition of later listed school buildings on the site, including the lodge, gymnasium, and the two C20th blocks.

PLANNING APPLICATION (17/00588/FUL)

We have been consulted under the terms of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 on the impacts on the heritage assets identified in our covering letter. This section of our response is structured around these heritage assets, as follows:

- **World Heritage Site** – [Edinburgh Old and New Towns WHS](#)
- **Category A Listed building** – [Royal High School](#)
- **Other Category A listed buildings** – [St Andrew's House](#); [Monuments on Calton Hill](#); [Burns Monument and Regent Terrace](#)
- **Garden or designed landscape on the Inventory** - [The New Town Gardens](#); [Palace of Holyroodhouse](#)
- **Other designations** – [Scheduled monuments](#); [Royal Palace or Park](#)

World Heritage Site

In assessing the impact of the development on the World Heritage Site we have used our *Managing Change Guidance on World Heritage* (September 2016). This document notes that all World Heritage Sites have an associated Statement of Outstanding Universal Value (SOUV), which explains the importance of the Site and a Management Plan that provides a framework for the long-term protection and sustainable management of the Site's OUV. Assessment of applications should focus on the impact changes could have to the OUV of the World Heritage Site and that, where possible, adverse impacts should be avoided. The OUV of a World Heritage site and its protection and preservation is a material consideration in the determination of decisions on planning applications.

The SOUV notes the creation of an outstanding urban landscape by the juxtaposition between 'the organic medieval Old Town and the planned Georgian New Town'. The site of the Royal High School is located at one of the most visible and marked juxtapositions between both, at the junction of the New Town and Old Town Conservation Areas, midway up the Calton Hill above the Waverley valley. The site clearly and visibly shows the carefully planned neo-classical ensemble of the school rising above the jumble of more organic growth on the North Back of the Canongate (Calton Road). This is vividly shown in the famous TH Shepherd view from 'Modern Athens!', taken from Canongate churchyard.

The SOUV also notes the importance of successive expansions of the first New Town. The former Royal High School is a key component of one of these, the Calton Scheme, a major expansion of the city to the east that involved the creation of Regent Road as a new eastern approach to the city, and which included neo-classical terraces encircling the mid-point of Calton Hill. Planned by William Playfair on principles developed by William Stark, it worked with, rather than against, the topography and landscape of the Calton Hill, reflecting the rise of the later C18th picturesque landscape movement. This was a significant move away from the strict symmetrical and hierarchical grid pattern planning of the first New Town. The result is a less urban environment suffused with landscape and open views. This is a more vulnerable environment for significant development than the more confined urbanised street-grid of the first New Town or organic development

of the Old Town, both of which have been subject to ongoing historical development. Regent Road connected with Waterloo Place, a neo-classical eastern extension to Princes Street designed by Archibald Elliot and aligned with the hill and its monuments as a backdrop.

The Royal High School is a key building within the WHS. It is one of the 'finest public and commercial monuments of the neo-classical revival in Europe' as mentioned in the SOUV. The first WHS Management Plan specifically identifies it as one of three 'notable public buildings', in the New Town, the others being Register House and the Royal Scottish Academy.

The proposals would disrupt the important open landscape setting of the neo-classical school against its established Calton Hill backdrop, seen from many locations in the Old Town, as well as from Regent Road itself. The Hamilton building was deliberately set upon an artificial ledge mid-way up the hill to exploit this setting, allowing long views of the building against its picturesque backdrop of hill and monuments. The new wings, especially the western wing, would disrupt the current arrangement by masking much of its picturesque landscape backdrop. The development would also impact on the current authenticity and integrity the Hamilton building retains within its original planned setting.

The proposals would also disrupt the Hamilton building's relationship with the hill-top monuments on Calton Hill that form part of Edinburgh's iconic skyline. The most important of these relationships is the symbolic association between the Royal High School's Propylaea, or gateway building, to the National Monument as Parthenon – the recreation of the Acropolis in Edinburgh's Athenian townscape. This adds to the importance of the site, and reflects on Edinburgh's status as a major cultural centre of European thought and learning following the 18th Century Age of Enlightenment.

Conclusion

We strongly dispute the statement within the Heritage Impact Assessment (HIA) that the present development would have a more beneficial than adverse impact on the OUV of the World Heritage Site. Although we understand the adopted methodology for the HIA it is difficult to follow the reasoning underpinning the assessments of impact. We consider there would be a significant adverse impact on the Outstanding Universal Value of the site and therefore object to the application.

The Royal High School is one of Scotland's finest Greek Revival buildings, important on a worldwide stage. The ideas implicit in its design and construction, and the shared relationship with the National Monument on Calton Hill, say a great deal about Edinburgh's ambition and Enlightenment thinking. This is a key part of the OUV of the World Heritage Site.

The proposals, if implemented, would result in considerable damage to the setting of one of the most important neo-classical buildings in the city, removing its current prominence and current domination of its carefully conceived and planned site; reducing it to a subordinate structure set between its new wings: as the wings became instead the dominant features of Calton Hill's southern slope.

The proposals would also remove much of the Hamilton building's character within its designed and planned extension to the New Town, introducing an urban level of development in an area specifically planned to celebrate landscape links. The particular visibility of the Hamilton building, and its location at the very junction of Old and New Town, would diminish the integrity and authenticity of the site.

It is perhaps rare for works to one building to potentially have such an impact on the OUV of the World Heritage site. However, the particular combination of important building, important site and strong cultural significance makes this an uncommon case. Its visibility and prominence within the WHS is at odds with development elsewhere within the WHS that has been largely confined within an urban grid.

Former Royal High School

We have been consulted on the planning application for development which 'may affect a category A listed building or its setting'. Here we intend to concentrate on the impact on the setting of the Hamilton building, noting the more detailed interventions to the building and the proposed extensions themselves under the listed building consent response later in the document. There will, however, be a degree of crossover between.

Setting of the A listed building

In assessing the setting of the school we have followed our *Managing Change in the Historic Environment Guidance: Setting* (June 2016). Where development is proposed, this guidance suggests a three stage process to identify the impact:

- identify the historic asset(s) affected
- define the setting of each asset
- assess how any new development would impact on this setting

If this analysis finds a detrimental impact on the setting of the asset(s), then proposals should seek to avoid or mitigate these impacts.

1) Identify the historic assets that might be affected by the proposed development.

We consider Hamilton's Royal High School, and its associated pavilions, screen walls, gateways, boundary walls, steps, belvedere and railings, to be the principal asset, alongside the later C19th lodge and gymnasium buildings. The other C20th buildings on the site are also historic assets, but can be considered to have less significance.

2) Define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced.

It is first worth considering and defining the immediate setting of the building itself. Although the main architectural treatment and monumentality of the building is necessarily directed towards the largely windowless front elevation, the secondary

elevations, as architectural historian Howard Colvin noted, are also impeccably detailed with a careful assemblage of details. This was perhaps inevitable as the main entrance to the building has always been from the north, the convoluted frontage access only being used for limited ceremonial occasions. Therefore, the north elevation, visible from many points on Calton Hill, not least the access road, is given a finer elevational treatment than might otherwise be expected (that is, had it been simply a 'rear' elevation), with a central pilastered pedimented portico and projecting pilastered side wings.

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 from the town with the first view of the building. (This is currently part obscured by later C20th tree planting – see Hamilton's elevation drawing on p.36 of Part 1 of the revised Heritage Statement, for comparison with the original intention.)

The frontage onto Regent Road also includes the separate pavilions, angled to the road, with extensive railed boundary walling, grassed banking, steps and gatepiers. To the north is a retaining wall against the hill access road, and a Belvedere in the very north-east corner of the site.

Thus, in contrast to streetscape architecture, to appreciate the building, which has not been extended or significantly altered since construction, it must be viewed 'in the round' with any interventions to all elevations carefully handled so as not to harm the immediate setting of the building.

Regarding the Hamilton building's wider setting – the building is prominently situated on an artificial ledge, with stone retaining wall, created at great expense and difficulty, by the engineer Robert Stevenson, mid-way down Calton Hill. This was part of the wider Calton Scheme (noted above), a departure from the strict grids of the first New Town, being undertaken in consideration with the landscape and topography.

The former school occupies the centre of the site flanked by open playgrounds, with the landscape background of the hill visible above it and to both sides. The main elevation of the school faces south, and is visible from many viewpoints across the city, including (as previously stated) the famous TH Shepherd print for Britton & Shepherd's *Modern Athens!* (1829) from Canongate Churchyard. The text with the image describes the building as a 'magnificent structure...one of the greatest ornaments to the City of Edinburgh(with the) Calton Hill rising majestically behind, with Nelson's and the National Monuments on its summit...form(ing) a pleasing contrast with this elegant structure'.

The school is also immediately visible from the western approaches down Regent Road. The western playground was open and free of any obstructions (the 1970s planting to shield the car parking has altered this). The applicants acknowledge that Hamilton's 'clearly prescribed intentions' were for this western elevation to remain visible from principal views. The building was also designed to be viewed from the north, from the hill itself, and from its access road. Views to the east of

the site are more confined by the adjacent Regent Terrace and intervening topography and planting.

The setting of the school can also be described as ‘rus in urbe’ – a phrase suggesting the illusion of countryside in an urban setting. In this, the relationship between the school and the Calton Hill is vital. The topographical similarity between Calton Hill and the Acropolis resulted in a shared relationship between the school and its hill-top monuments, shown in numerous prints and paintings, including Hamilton’s (and artist David Roberts’) own watercolours. However, the primary relationship is the symbiotic and symbolic architectural and cultural link between the school as the gateway building (Propylaea) to the National Monument (Parthenon) above.

The later development and expansion of the school site seems to have consciously respected the main building. The applicant’s Heritage Statement suggests the understood significance of Thomas Hamilton’s building resulted in it being ‘unmolested’. Thus, there are no major alterations or extensions to the building. Later school buildings, predominantly single-storey (the gymnasium was later raised), were set away from the Hamilton building, tucked into the corners or rear of the site against the retaining wall to the hill’s access road.

The eastern playground was partly developed (initially with the gymnasium and later buildings at low-level) but the western playground – suggesting almost 2 centuries of respect for the Hamilton building’s setting – has remained comparatively clear, with only single-storey buildings tucked in the lee of the hill’s access road. Even when the school was looking for extra space to expand, the western playground appeared sacrosanct, and the importance of the building was seemingly a consideration in the final move to Barnton in 1968. The applicants acknowledge that the western playground is ‘highly sensitive to change’.

Today, the school remains in a remarkably similar open setting to its first construction, unencumbered by extensions, with new stone buildings, the lodge and gymnasium, either inspired by the classical school, or else low single-storey less permanent structures nestled unobtrusively within the site. Its backdrop, the Calton Hill, remains much as always, despite more gorse and woodland growth.

3) Evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated (see Section 4)

The new flanking extensions (discussed in greater detail under the listed building consent response) would build over the great majority of both the western and eastern playgrounds with the footprint of each extension exceeding that of the Hamilton building. The substantial plinths (lower ground floors) of the new extensions would encapsulate the side elevations of the lower ground floors of the Hamilton building reducing them to internal courts or, as the drawings note, ‘lightwells’. The plinth would also link into the, currently separate, twin pavilions, removing the distinct separation of these carefully composed buildings, mini-temples in their own right.

The proposals would completely disrupt the setting of the Hamilton building from the west, the current and historic entrance to the site, where Hamilton's visible western façade would be almost completely obscured from view. As before, the shielding of this western elevation, as the applicants acknowledge, would be 'contrary to Thomas Hamilton's clearly prescribed intentions'. The eastern elevation of the Hamilton building is necessarily more confined within the site, but the proposals would have a similar impact on it. The scale and location of the extensions would make it impossible to appreciate and comprehend the building in the same way, the side elevations essentially being subsumed and masked by the new work.

The proposals would significantly interrupt key views of the building against the hill from the south, where its frontage is visible from several locations. In some views the new extensions, particularly the western block, would breach the silhouette of the hill itself, but even when confined within the outline of the hill, would serve to diminish the Hamilton building's landscape backdrop. We do not agree that the 'dramatic architectural forms' outlined in the original submission, would compensate for the loss of the backdrop of Calton Hill.

There would also be an impact from elevated views from the north from several viewpoints on the hill and from the access road.

The scale, size and height of the proposed bedroom wing extensions, especially the western extension, acknowledged by the applicants to be on a location more sensitive than the east, would dominate the building to such an extent they would fundamentally change our current understanding and appreciation of the Hamilton building on its site. Both the five- and six-storey extensions would be over a storey-height higher than the Hamilton building, even exceeding the topmost part of the central pediment. The revised scheme has also reduced the separation, or 'breathing space' the previous scheme introduced, bringing the upper floors of the extensions closer to the Hamilton building and serving to enforce an urbanised wall of development across the site from Regent Terrace to St Andrew's House. Whilst we consider a significant building could be accommodated within the eastern playground, it should ideally be no higher than the current gymnasium building, and should allow some separation between it and the listed building, as was set out in your Council's Massing Analysis.

Visually, and in combination, the extensions would loom above the Hamilton building on either side, dominating it by their size, prominence and height, reducing the monumental classical building to a secondary element within a new composition. The magnitude of change would result in the Hamilton building ceasing to be the focus of the site, its current primacy removed. It could no longer be approached or viewed without the extensions either being visible or taking precedence.

The design and materials of the extension, including the floor-to-ceiling glazing, would also impose a visual contrast to the masonry Hamilton building (night and day), serving further to draw attention to the wings at the expense of the relatively subdued masonry building.

The proposals would also adversely affect the setting of the school and its relationship with surrounding listed buildings, including the National Monument and St Andrew's House. We will discuss these impacts in more detail later.

We do not consider that the scheme, with the accommodation required by this particular development, can be mitigated.

Conclusion

Despite it being almost 200 years since its construction, the Hamilton building retains a great deal of its original setting within the site. It is also unaltered and un-extended and still set within its original boundary treatments. As the applicants suggest, an early realisation of its significance and importance may have assisted in the preservation of its setting.

We consider the proposals would significantly harm the setting of the Hamilton building. The works, which would be permanent and irreversible, would destroy the current primacy the building has within its site, relegating it to a structure subsumed by, and subordinate to, its flanking extensions, and rather more as a piece of streetscape instead of a standalone architectural paradigm. The extensions would detach and disturb the building from its established backdrop and landscape setting against Calton Hill. The understanding of the building and its cultural and historical relevance would be greatly diminished.

It is hard to reconcile the applicant's acknowledgement that the western playground is highly sensitive to change when viewed against the current proposals. The site simply cannot absorb the level of development proposed without a significant adverse impact on the setting of the Hamilton building.

Setting of other Category A Listed buildings and assets

There are other Category A listed buildings in the vicinity that are affected, by differing degrees, to the proposals. As above, we have followed the advice in our *Managing Change in the Historic Environment guidance* on Setting. We consider the impact on the Category A listed St Andrew's House, National Monument and Nelson Monument, would be sufficient in each case to warrant our objection

St Andrew's House

St Andrew's House is described in the applicant's submission as 'one of the most outstanding 1930s buildings in Britain'. 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 Calton Hill, with its 'varied and picturesque monuments forming an ideal background for the new building'. Tait's design was generally agreed to have succeeded, its monumental scale broken down by careful design, respecting the surrounding topography and neither 'overloading the hill or obliterating its fine outline'.

The building has an established relationship with its background landscape setting of the hill from the south and south west, but also a relationship with its neighbour the Royal High School. The open space between both listed buildings is important for their shared setting, as are the steadily revealed open views of Holyrood Park between the buildings from the western approach along Regent Road. This gap between both buildings is also visible from northern views from the approach road to Calton Hill.

The development of the western playground with the proposed five-storey hotel wing would impact adversely on the setting of St Andrew's House. The current situation of St Andrew's House, viewed against the hill's backdrop, would be harmed by introducing the development between it and the school in southern and south-western views. The 'filling in' of this established open space between the two nationally important Category A listed buildings would create and enforce a 'wall of development' in several long views from the south/ southwest, north and west. The western bedroom wing would also impact on the western approaches to the building, rising far above the open skyline silhouette of the crags and Holyrood Park behind.

Monuments on Calton Hill

The Conservation Plan for Calton 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 [nearly] all were built in classical styles that alluded to classicism and reinforced the intellectual link with Athens' [and the Acropolis].

There is a symbiotic relationship between the school and several of the hill-top monuments and their contribution to the picturesque and romantic landscape setting against the skyline and natural backdrop of the hill.

National Monument

The most significant impact of the proposals would be on the relationship between the Royal High School and 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 assisted by Calton Hill's topography and visual resemblance to the Acropolis. Therefore, when Hamilton based his design on the Propylaea, the link was obvious, intentional, and would have been understood. The setting of the National Monument therefore relies on the important collective relationship between itself and the Hamilton building below, the gateway to both it and the hill. The relationship, visible in numerous paintings, prints and photographs is fundamental to the understanding of the Calton Hill as Edinburgh's Acropolis and the city as the 'Athens of the North'. Rarely has an architectural kinship been so clear.

The introduction of two large bedroom wings of five/six storeys either side of the Hamilton building would harm the established relationship with the National Monument. As already stated, the western block is the more significant intervention, but the sheer scale and visibility of both the wings would immediately draw the eye, reducing and belittling the former school in stature and prominence,

and in particular harming the immediate links between the unfinished Parthenon and its Propylaea.

Nelson Monument

The Nelson Monument, although not as architecturally or intellectually linked to the school as the Athenian monuments, is one of Edinburgh's most prominent landmarks and is immediately visible above the western part of Calton Hill. The development of the western bedroom wing would impact significantly on the setting of the Monument. It is visible from the western approaches down Regent Road and rises above the school building in views from the eastern approaches. The impact of the new western extension would truncate views of the Monument and its landscape base from Regent Road.

Views of the Monument and Hamilton building would also be significant in views from the south, including the Shepherd view from Canongate Churchyard. Here the Monument would be viewed immediately above the western extension, its landscape base again removed. Views of the new western extension would also be highly visible from the Monument itself. Early images show the school and the entirety of its west façade visible from the Monument.

Other Monuments

The impact on other monuments on the hill would be less significant, despite the shared relationship between Greek Revival architecture. These include the Dugald Stewart Monument, a near contemporary with Hamilton's own Burns' Monument. It can be seen from the western part of the former school site and some wider views, but its significance has been lessened by later tree growth in this context.

Setting of Burns Monument and Regent Terrace

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 on the Acropolis, which was also the inspiration for William Playfair's Dugald Stewart Monument. Although views shown with both monument and school included were common, including Hamilton's and David Roberts' painting, in reality there are a limited number of views and locations where both the monument and the proposed wings would be seen simultaneously. The Monument's current setting against the lower 'gymnasium' block would be affected by the increase in scale of the eastern hotel wing from the Monument, but, on balance, the impact is not considered nationally significant. This is primarily due to the Monument being less visible in southern views of the Hamilton building. In addition, its location on the south side of Regent Road means it is largely viewed in approaches from west and east on Regent Road against a backdrop of Holyrood Park, rather than the site in question to the north.

Regent Terrace

The proposals introduce a larger block adjacent to the western end of the listed Regent Terrace, but we do not consider the impact and change would be significant in views either towards or from there.

Gardens and Designed Landscapes

The New Town Gardens Inventory Designed Landscape

We have considered this proposed development at the former Royal High School in terms of its impact on The New Town Gardens designed landscape (GDL), which in 2001 was added to the *Inventory of gardens and designed landscapes* in recognition of its national importance.

We have used the relevant Guidance Note, *Managing Change in the Historic Environment: Gardens and Designed Landscapes* (September 2016), published by Historic Environment Scotland, to assess the impact of the proposed development, adopting its recommended three-stage approach to identify, assess and mitigate.

1) Identify: understand the significance of a garden and designed landscape and identify the current baseline.

The proposed development site is located on the southern flank of Calton Hill, a major element of The New Town Gardens Inventory designed landscape and the most significant topographical feature in Edinburgh's New Town. The Inventory site has outstanding value as a work of art, and has outstanding historical, architectural, and scenic value. The New Town Gardens are an important component of the World Heritage Site, specifically in the planning of the New Town.

The New Town Gardens comprise a series of 18th-19th century town gardens, squares and walks, which, together with the surrounding buildings, are collectively termed the 'New Town'. They were designed to take full advantage of the topography and townscape, they range in size, and are located in visible or prominent locations, to create an impression of 'rus in urbe' – the illusion of countryside in the city. They make an important contribution to the character of the area, and offset the controlled, surrounding architecture.

Neo-classical town planning sought order, symmetry, and a hierarchical arrangement of buildings and spaces. However, as the picturesque landscape movement became more prevalent in the later 18th century, the dramatic scenic possibilities of Edinburgh's topography were exploited. Thus later New Town developments were designed to relate to Edinburgh's dramatic topography rather than ignore it, resulting in a more romantic composition of classical buildings juxtaposed with naturalistic landscape features. This was spectacularly realised in the design principles established for the Calton Scheme by William Stark (d.1813) and implemented from 1819 by W H Playfair.

From its inception, the relationship between Calton Hill and the Former Royal High School was subject to thoughtful design and careful positioning.

Stark's vision was to exploit the Hill's natural qualities and keep the hilltop as a public space, free of development. Consequently, the former Royal High School was carefully placed on an artificial terrace, a manipulation of the landform of Calton Hill which heightened its picturesque qualities and harmonised the buildings' relationships with the topography of the hill.

The former Royal High School was designed to be clear of screening and softening vegetation, so that the elevation was viewed as prominently framed (including from below) by the rocky, dramatic form of Calton Hill.

2.) Assess: assess the potential impact of a proposed change on the site and its setting.

Inventory entries identify the values for which sites are designated. Applications should address the capacity of an Inventory site to accommodate the change proposed and should, where possible, seek to avoid compromising these values.

The ES states that the development would result in a slight change to the New Town Gardens GDL; it would be visible from within only a small part of the Inventory site; and it would not adversely affect any key views within the GDL. It argues that the removal of the Gymnasium Block would aid the ability to understand the picturesque ideals mentioned above.

The ES concludes that the proposed development would cause an effect of negligible magnitude and minor significance upon the setting of the New Town Gardens GDL, causing a neutral effect. (ES, Chapter 10, 10.9.105; Appendix J7: Assessment of operational effects: Asset Group 32).

We disagree with that assessment.

Firstly, the development would have a direct impact on the New Town Gardens GDL – that is, physical change(s) within the boundary of an Inventory site – and not solely on its setting.

Secondly, we do not agree with the methodology that was used to reach this conclusion. In the Assessment of Operational Effects on the New Town Gardens Inventory Garden and Designed Landscape (ES, Appendix J7) the Inventory site is accorded High sensitivity to change. However, it is difficult to follow the rationale in the application of the assessment criteria set out in Table 10.2 in Chapter 10 of the ES which gives 'Very high' sensitivity to Inventory gardens and designed landscapes which convey the OUV of the World Heritage Sites. As a significant component of the World Heritage Site, the New Town Gardens should be accorded a 'very high' sensitivity.

Thirdly, the application material significantly underplays the impact of the proposed development on the Inventory site and we do not agree that this development would have an impact of minor significance.

3.) Mitigate: identify options to avoid, reduce or compensate for adverse impacts, and to enhance positive benefits.

Proposed development should seek to avoid significant adverse impact on Inventory sites, but where this is not practical, impacts should be mitigated by careful design.

The proposed development would have a significant adverse impact on Calton Hill, which forms an important element of the New Town Gardens Inventory designed landscape. We do not think the current proposals avoid or reduce adverse impacts on the Inventory designed landscape in line with the mitigation measures set out in Stage 3 of the *Managing Change Guidance Note*:

The new development would represent a significant intervention in this sensitive part of the Inventory site. Where previous developments have been carefully located to give emphasis to the form and scale of Calton Hill, the proposed hotel extensions would instead obscure and dominate it.

Unlike the existing buildings and monuments on Calton Hill, the proposed development does not work with the existing site topography in order to reduce the impact, instead it works against the contours of the hill, obscuring its form.

In the existing Calton Hill composition, all the elements are united by their use of local stone, a limited range of architectural styles and the way their forms converse with the dramatic landform. Introducing different materials for the proposed new wings would change this dynamic, and the use of full-height glazing, when illuminated either from within or by reflection, would increase the impact and visibility of the new wings, rather than mitigate the impact.

We consider that the scale and massing of the proposed development would overload and dominate the hill. It would introduce a new design language and materials into a carefully designed picturesque composition of national significance. We conclude that this development as currently proposed has not been designed to avoid or reduce significant adverse impact on the Calton Hill area of the New Town Gardens Inventory designed landscape.

Conclusion

We object to this proposed development on the basis that it would have a significant adverse impact on the significant features and character as well as a series of key views of Calton Hill, which is a significant and visually prominent element of the New Town Gardens Inventory designed landscape and of the WHS. The location, scale, massing and materials of the proposed hotel extensions would introduce a dominant element into this carefully composed picturesque ensemble. Calton Hill is the highest and most prominent natural feature in the Edinburgh New Town. Intentionally exploited in the design of the New Town Gardens Inventory site, its monuments, road layout, public buildings, residential terraces and open spaces were skilfully designed to give the relatively small hill – compared with nearby Castle Hill, Arthur's Seat and Salisbury Crags – increased stature and create a dramatic picturesque setpiece: a *rus in urbe*, a commemorative site, the visual manifestation of Edinburgh as 'Athens of the

North', and a key part of the Edinburgh New Town where town planning and picturesque landscape design spectacularly came together.

Palace of Holyroodhouse Inventory designed landscape

We have considered this proposed development in terms of its impact on Palace of Holyroodhouse designed landscape (GDL), which in 1987 was added to the Inventory of gardens and designed landscapes in recognition of its national importance.

The ES states that the proposed development would have no effect upon the layout of Holyrood Park, nor upon the ability to appreciate the landscape of Arthur's Seat and Salisbury Crags; that it would have no effect upon the localised setting of the more formal gardens immediately adjacent to Holyroodhouse; that the panoramic views from the park would be unaffected; and that the proposed development would cause a slight change in the nature of views towards Calton Hill from within the park.

We disagree with that assessment.

Our assessment concludes that the application documentation underplays the impact of the proposed development on the setting of the Inventory site; and we do not agree that this development would have an impact of minor significance. Instead, we consider that the presence of new development in this view, directly behind the Palace and breaking the line of Calton Hill, would have an adverse impact on the understanding, appreciation and experience of views towards Calton Hill from the Park.

However, we conclude too that these impacts are not significant enough to warrant an objection from us.

Other designations

Holyrood Palace, Abbey and Gardens - Scheduled Monument

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. However, we do not consider the impact to be significant.

Development of land within 800m of a Royal Palace or Park

The development is within 800m of a Royal Park. Although the proposed development will be visible from several locations within the Royal Park, we do not judge its impact as significant.

ENVIRONMENTAL IMPACT ASSESSMENT

This section contains our comments both on the [Environmental Statement](#) and the [Heritage Impact Assessment](#).

Environmental Statement - methodology and assessment criteria

Comments under this heading are restricted to those on Environmental Statement (ES) assessment methodology, assessment criteria and the environmental baseline as reported in chapter 10. Our comments on the application of those criteria and the findings of the assessment of impacts are made under the headings on listed building impacts (both for the [planning application](#) and the [LBC](#)) and impacts on the [New Town Gardens](#) and [Palace of Holyroodhouse GDL](#).

Assessment methodology

The assessment methodology is set out in section 10.5 of chapter 10 of the ES. This sets out how the assessment was undertaken and describes the criteria which underpin it. This section appears clear as it describes how effects are categorised (beneficial, neutral or adverse) and provides a description of each type of effect in paragraph 10.5.2.

We note the criteria set out in tables 10.2 (sensitivity of heritage assets), 10.3 (magnitude of demolition effect), 10.4 (significance of demolition effect), 10.5 (magnitude of construction effect), 10.6 (significance of construction effect), 10.7 (magnitude of operational effect), 10.8 (significance of operational effect) and 10.9 (cumulative developments). We note that the information in these tables has been derived from the ICOMOS guidance on Heritage Impact Assessments, as noted in the footnotes in this chapter. We welcome this and consider that this assists in bringing some clarity to the judgements applied in the assessment.

However, in terms of the definitions supplied in table 10.3 we find the reasoning here to be unclear. It is difficult to follow how the magnitude of a demolition effect could ever be less than high since it is always likely to mean the total or substantial removal of a building and consequently cause a fundamental change to its physical condition.

We have no further comments to make on tables 10.5 – 10.9.

Designations

We note that paragraphs 10.7.5 acknowledge the status of buildings 1 – 7 as identified within the indicative site boundary in figure 1.1 as being category A listed. However, It is not made clear what is meant by the statement at the end of paragraph 10.7.6 as their being category A listed ‘...only by virtue of curtilage’.

Limitations and assumptions

We note the limitations of the assessment as described in paragraph 10.6.1.

We note the statement in paragraph 10.6.2 that it has not been necessary to make any assumptions in undertaking this assessment. We disagree with this statement

as a significant assumption does appear to have been made in the course of the assessment; namely, that the buildings within the red-line boundary not specifically mentioned in the list description (the classroom block and the luncheon hall) are not of sufficient special architectural merit to warrant being category A listed. This leads to their being given a lower value of sensitivity to change in the baseline assessment. We have no record of being asked to formally review these listings during the planning process.

Built heritage within the proposed development site

We note the environmental baseline as set out in paragraphs 10.7.8 – 10.7.22. The assumption which appears to have been made as described above can be seen to have influenced the reporting of the baseline in these paragraphs.

Application of the assessment criteria

An assessment of operational effects is provided in volume 14, appendix J7 of the Environmental Statement. As a general point, it is not clear how the assessment criteria set out in table 10.2 have been applied.

For example, the National Monument on Calton Hill (asset 25) is noted as being of 'high' sensitivity to change. In reference to the criteria given in table 10.2, this would suggest that this monument is not considered to convey OUV of the world heritage site. The Former Royal High School is assigned a value of 'very high' in relation to sensitivity to change. This suggests that it is considered to convey OUV of the world heritage site.

The assessment under the 'change' heading goes on to note, amongst other things, that the intended relationship between the Royal High School and the National Monument is key to understanding and appreciating these assets. In light of this statement, it is not clear how the two buildings have been accorded different values in relation to sensitivity to change. On this basis, the rationale underpinning the assigning of values in the assessment is difficult to follow.

Further, detailed comments on site specific issues can be found under the relevant headings in this letter.

Heritage Impact Assessment – methodology and criteria

Comments under this heading are restricted to those on the methodology, assessment criteria and the environmental baseline as reported in part 3 of the Heritage Statement, the Heritage Impact Assessment (HIA). The full heritage statement appears in two of the volumes of the ES as three separate appendices (volume 11 - appendix J2, volume 12 – appendix J3, appendix J4). (Our comments on the application of those criteria and the findings of the assessment of impacts within the HIA are made under the headings on listed building impacts and impacts on the New Town Gardens and Holyrood Palace GDL)

HIA methodology

We note that it is stated that ICOMOS's guidelines have formed the basis for the assessment methodology and criteria. However, there are variations between the table presented under paragraph 6.45 and that set out on page 10 of ICOMOS's

document. These variations have the potential to influence the assessment and could lead to an underestimation of the potential effects of the development.

Evaluation

As a general comment on the assessment of the various viewpoints included within the assessment, it is unclear what has been regarded as constituting an 'asset'. Assets are included as the feature in the individual viewpoint assessments, each of which is assigned value. Whilst the table contains a row listing 'relevant clauses from OUV' which are said to have been considered in the assessment, it is not clear how this relates to the 'asset' which is then assigned value.

LISTED BUILDING CONSENT (17/00587/LBC)

Listed building consent concerns works that affect the character of a listed building. Impacts on the character of a listed building will depend on direct impacts to the exterior and interior of the building as well as its setting.

In considering the applications we have used HESPS ([Historic Environment Scotland Policy Statement – June 2016](#)). That document provides detailed advice on how high-level policies contained in SPP ([Scottish Planning Policy](#)) should be applied in practice. We have also used our *Managing Change in the Historic Environment* guidance on *Extensions, Demolition and Setting*.

These comments are separated into the following sections:

- [The Hamilton Building](#), including proposed [physical alterations](#) and [proposed extensions](#)
- [Demolition of other listed buildings](#)

The Hamilton building

Special interest of the Hamilton building

The statement of special interest within the list description describes the Royal High School as being of ‘great architectural, cultural and historical significance’, a ‘unique and powerful combination of setting, massing and masterful use of classical architectural language’. It notes the design was ‘inspired by the dramatic setting’ and the backdrop of the National Monument and the reinforcement of similarities between Calton Hill and the Acropolis, and thus between Edinburgh and Athens.

The character and special interest of the Hamilton building relies much on its survival and level of intactness and authenticity. The exterior of the symmetrical composition remains much the same as designed by Thomas Hamilton almost 200 years ago; un-extended and unaltered within an open setting against the backdrop of the Calton Hill, below the National Monument. It is currently possible to approach the building and experience the outstanding architectural design and features of the building ‘in the round’ as originally intended.

Proposals

The proposals would introduce two flanking five and six-storey extensions that would obscure approaches and views of the building from the east and west. The currently-visible side elevations would be obscured from view by internal lower ground floor courts that would also join to the building’s twin pavilions. The impact would be considerably more significant on the more visible western façade of the building, the entrance to the site, and it is the western extension that is of greatest concern.

The extensions would be of greater scale and height than the Hamilton building, introducing considerable development either side of the listed composition in areas, especially on the western side, largely free of development. The proposals

would impact greatly on the setting of the listed building, a major component of the building's special interest.

Assessment against HESPS

We consider that the impact of the proposals on the character and special interest of the listed building would be significantly adverse. Although the applicants only consider that parts of their development have, at worst, a minor adverse impact on the special interest of the listed building, they have addressed responses to HESPS Para 3.47.

HESPS Para 3.47 states:

Where a proposal involves alteration or adaptation which will have an adverse or significantly adverse impact on the special interest of the building, planning authorities, in reaching decisions should consider carefully:

- a. the relative importance of the special interest of the building; and
- b. the scale of the impact of the proposals on that special interest; and
- c. whether there are other options which would ensure a continuing beneficial use for the building with less impact on its special interest; and
- d. whether there are significant benefits for economic growth or the wider community which justify a departure from the presumption set out in paragraph 3.38 above.

These points are addressed individually below.

a) The building's special interest could hardly be higher. It is a Category A listed building of undisputed importance, both nationally and internationally. It is a symmetrical free-standing composition, designed in the round, with all elevations carefully handled and ashlar-faced – here it differs from many listed buildings where secondary elevations are judged less important. It is unaltered and unextended and its original setting remains open, despite the later buildings associated with the school.

b) The impact of the proposals on the building's special interest would be considerable. The proposed wings flanking the main building would be larger in footprint and over a storey-height higher than the adjacent listed building. They would enclose the side elevations of the building and shield them from view. The impact of the proposals would result in it no longer being possible to appreciate and understand the Hamilton building in its original setting or context.

c) This point is key. In the Heritage Statement the applicants have deemed it 'inappropriate' to consider other uses for the building. However, where proposals are adverse we must consider whether less harmful alternatives exist. In many cases the investigation of options can be left to the open market but in this case we do not need to speculate whether an alternative scheme exists. The RHSPT scheme for St Mary's Music School (15/05662/FUL & 15/05665/LBC) has been

granted planning and listed building consent and is, we understand, fully funded. It proposes a less harmful approach to the site, including no development on the western playground and low-level development on the eastern playground (lower than the existing gymnasium). This would reveal the Belvedere, obscured from most open views within the current proposals. Also importantly, it also does not require the demolition of the entrance lodge.

We do not rest on the fact that a particular alternative scheme has been granted permission. However, by the fact of that scheme's existence, we are forced to conclude that there may be other options for the Hamilton building which could be fully explored, to secure its repair and beneficial reuse with less impact on its special interest and setting.

d) We acknowledge that there would be some benefits to economic growth with the proposals, but we do not consider that they outweigh the important presumption in Para 3.38:

Once lost listed buildings cannot be replaced. They can be robbed of their special interest either by inappropriate alteration or by demolition. There is, therefore, a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting.

The alterations, specifically the addition of two flanking wings, but also the proposed demolition of the lodge on the site, would be so inappropriate, that it would cause real damage to the special interest and setting of the listed building.

We would argue that the applicants have failed to address these points successfully. We would refute their suggestion that their scheme addresses previous adverse incremental change. It would instead impose significantly adverse changes of far greater magnitude, changes that would be both irreversible and permanent.

An internationally important building would no longer be able to be appreciated alone, or as the primary focus of its site, with little more than its south elevation surviving in everyday view. It would, instead, be encompassed by, and made subservient to, its modern wings. The western extension, in particular, would damage the historic and current approaches to the Hamilton building.

Physical alterations to the Hamilton Building

We welcome the repairs proposed for the Hamilton building and boundary treatments and are content with the majority of the proposals to convert the building for hotel use. These include the proposed new access openings to the north of the main hall and the proposed addition of a north glazed circulation corridor to ensure the main rooms remain independent. We note that the revised design of this corridor has changed to a hybrid design absorbing the façade treatment for the new extensions, and would suggest the former approach, of simple glazed corridors, is preferable. Again, rather than access the two 'dining lounges' from the glazed corridor directly with two proposed new openings, it would seem less damaging to utilise the immediately adjacent and original existing

doorways as lobbies to the spaces instead. As planned, the original doorways are only proposed to serve as toilets and ancillary space.

The corridor links to the new extensions are now proposed to be taken from the rear elevation rather than the side elevations. We welcome this less damaging intervention, but would again suggest a simpler glazed treatment preferable for the links. A small portion of Hamilton's boundary walling, by the gates, is to be lost but we do not consider this significant.

The armorial panel dated 1578 from a former Royal High School building is part of the special interest of the listed building. We would prefer it is left in-situ, but if an appropriate location is found for it, would have no issue with its resiting.

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 then removed to Barnton. The opening up of the door is also welcomed as is the removal of the Property Services Agency (PSA) balcony extension and restoration of the original stairs to access it, and repairs to the coffered ceiling. 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.

The loss of the form and fabric of the school assembly hall, retained in the PSA works, with its raked 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, but we appreciate that such a feature has limited flexibility and we would, on balance, accept its removal for an otherwise acceptable reuse of the building.

Our major concerns are focussed on the new extensions, and their intersection with the Hamilton building and its twin pavilions. The lower ground plinth extensions on either side of the Hamilton building would result in the loss of Hamilton's original railed enclosure, steps, balustrading and the grassed bank angled to allow views of the entire side elevations. The lower ground floor of the Hamilton building would become an internal courtyard or lightwell with very limited external visibility, rather than an important open element of a considered and visible façade. The important side facades of the building, designed to be visible 'in the round', would no longer be able to be viewed, appreciated and understood in their current context. They would be subsumed in a manner harmful to the special interest of the listed building.

The plinth is also proposed to link to the separate eastern and western pavilions at their upper level. Even though the additions would be largely obscured by the screen wall from the south, filling in the open space here would harm the individuality and separate nature of the pavilions, reducing the understanding and appreciation of these important and carefully composed buildings within the wider site. The Heritage Statement presents this as a minor adverse impact, but we consider that the impact would be significant.

Conclusion

In conclusion, there are interventions proposed to the Hamilton building that would be both welcome and unwelcome. We are broadly content with the proposed internal works, to enable a new use to be provided within the building.

However, we consider that the linking of the listed building and the construction of the new bedroom wings would involve particular and permanent harm to Hamilton's considered side elevations, and pavilions, as well as the setting of the entire building. This element of the proposal would result in an objection from us.

Proposed extensions the Hamilton building

Para 3.51 of HESPS notes that 'when considering a developer's proposals to integrate listed buildings into an overall development, Historic Environment Scotland expect planning authorities to take into account not only the desirability of preserving the building's historic fabric but the need to maintain it in an appropriate setting'.

The setting of a listed building is an important part of its character and a significant factor in assessing its special interest. Annex 2 of HESPS notes setting as the 'context in which a structure sits [and that this] can be a critical factor in its evaluation'. Should the proposals be approved, the linked extensions to the main Hamilton building would themselves become part of the listed building.

We have previously discussed the setting of the listed building under the response to the planning application. Here we will specifically address the impact on both the special interest and setting of the listed Hamilton building from the addition of the western and eastern extensions. Our *Managing Change guidance; Extensions (Oct 2010)* notes that key issues in extending a historic building require that they:

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

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

We consider that the current proposals fail completely to address these key considerations. Dealing with them individually;

- 1) We do not consider the proposals would protect the character and appearance of the building. Currently the building is un-extended and set free-standing within an open site. It can be viewed and appreciated 'in the round', in accord with its original design intention.

The application proposes two five- and six-storey side extensions, each set above a plinth substructure. The extensions are proposed to be linked to the Hamilton building at ground and lower ground level. The lower ground floor level plinths would create small courts enclosing the lower floor of the side elevations of the Hamilton building; which, as noted above, is a considered composition. Besides the linkage through the rear facade, the positioning of the bedroom wings would almost completely mask and obscure the carefully composed side elevations, especially the currently visible western elevation on the approach and entrance to the site. It would no longer be possible to appreciate the side elevations in anything like their current context.

The current application has seen the removal of a storey from the western extension from the scheme refused in December 2015. However, the upper storeys of both proposed wings have now actually been placed closer to the listed Hamilton building. This has reduced the 'breathing space' between the extensions and the listed building, adding to the effect of a continuous 'wall' of development from Regent Terrace to St Andrew's House across the site. The new wings and linkages to the listed building would limit the current understanding and appreciation of the building, currently viewed in the round, damaging its character and appearance.

2) The extensions are not subordinate in either scale or form. The footprint of each of the extensions exceeds that of the Hamilton Building. The plinth superstructures in particular are very significant, especially on their impact on the listed building.

Both the western and eastern extensions are around 5m higher than the main side elevations of the listed building, and 2-3m higher than the highest point of the ridge of the central portico (the standard bedroom wing storey height is around 3m). Due to the height and sheer scale and massing of the wings, we consider the former school would become subordinate to its proposed wings rather than the desired opposite. As before, we consider that if the demolition of the gymnasium is justified, the eastern playground can accommodate a building of similar height to it; and we would not advocate the idea that development on the east playground should be mirrored by symmetrical development on the west.

3) The extensions are located on the side elevations but due to their scale, height and massing appear as one with the primary front elevation, especially from the visible open views from the south. It would be impossible to view or appreciate the Hamilton building from any location without these extensions being visible. In most views they would take precedence over the Hamilton building.

4) We do not intend to comment on the quality of the design in any detail. The choice of materials, pre-patinated copper, has been chosen to differentiate the wings from the masonry Hamilton building. Whilst an assertive contrast is often appropriate in additions to listed buildings, numerous storeys of floor-to-ceiling height glazing would have a radical impact adjacent to the windowless temple, reflecting the light by day and being informally lit-up by night. The materials would assist in immediately signposting the extensions, drawing the eye from the more sombre, largely windowless, Craighleith ashlar of the school.

Conclusion

We consider that both extensions, especially the five-storey western bedroom wing, would, by their height, scale and massing, dominate and overwhelm the listed building, challenging its primacy on the site. Rather than being modest, lower, or playing a subordinate role, they would, in fact, by their height and scale, reduce the listed building itself to the subordinate role.

We consider the proposals fail to address – indeed, contradict – the majority of the key points and considerations for extending listed buildings set out in our *Managing Change* guidance.

Demolition of other listed buildings and curtilage structures

The applicants have referenced HESPS Para 3.42 test c.) ‘the demolition of the building is essential to delivering significant benefits to economic growth or the wider community’, in order to justify the demolition of the lodge and gymnasium block, arguing that the loss of both buildings are essential in order to deliver significant benefits to economic growth. In addition, it is argued that the gymnasium block is considered to be less worthy of listing in its own right, addressing test HESPS 3.42 a). Both buildings were designed in 1885 by Robert Wilson, the Edinburgh School Board architect, with an additional classroom storey added to the gymnasium in 1894. Wilson’s classical work here is paying respect to, and copying details from, the Hamilton building.

Dealing with test a), there is a degree of confusion in the applicant’s submission over the status of the lodge, gymnasium and other buildings. Your Council has confirmed that all the pre-1948 school buildings on the site are listed Category A, even those unnamed in the list description. The applicants had the option to request that Historic Environment Scotland carry out a resurvey or consider the delisting of buildings, but no request has been made.

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, and clearly taking architectural reference from the Hamilton building. A Janitor’s lodge is a common arrangement in many Edinburgh schools. Its loss would remove a mutual relationship with the main school and its setting. The Gymnasium block is a tall two-storey stone-built building with projecting pilastered wings, again classical in form to respect the Hamilton building. It does obscure southern views of the belvedere in the corner of the site, but the current proposals also would largely obscure this from view. Both these buildings are listed, of architectural and historic interest, and add to an understanding of the C19th evolution of the site. Other buildings proposed to be demolished, of lesser interest, include a single storey extended luncheon block (1930s and 1949) and a classroom block (1946). We do not agree with the Environmental Statement that the demolition of the gymnasium and lodge would be of a low magnitude and of beneficial effect to the Hamilton building.

It is hard to understand why the demolition of classical stone buildings would be beneficial. Even if any perceived benefits are achieved from the loss of the buildings and restoration of the site to an earlier period, these would immediately be lost by the considerably larger buildings proposed to replace them (which themselves are considered beneficial by the applicants).

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 HESPS 3.42 c.) *the demolition of the building is essential to delivering significant benefits to economic growth or the wider community*; 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. Our *Managing Change in the Historic Environment: Demolition (Oct 2010)* notes that 'clear evidence' should be provided that 'every effort' has been made to incorporate a listed building within a development or to place the development in an alternative location'.

Your Council will be best placed to judge the justification provided, and the scale of the economic benefits suggested by the proposals.

We then have to assess whether the retention of the buildings are, as our *Managing Change* notes, preventing 'wider public benefits flowing from the redevelopment of a site'. This test is normally only used in exceptional circumstances when the loss of a building is essential to obtain wider benefits.

We have concerns that the need to demolish the buildings is based on this specific scheme, described as 'the minimum necessary to fulfil the operating brief for an international hotel' and that other less invasive proposals, that offer similar benefits, may be able to retain certain of the buildings. This would specifically apply to the lodge, which seems to be proposed for demolition in this scheme due to the placing of the access road to the rear portico and the need for a large residential block on the western playground.

The applicants have argued that there is no alternative viable use for the site that could retain the two listed gymnasium and lodge buildings (the other pre-1948 buildings are listed too). It remains unclear whether either of these buildings could be retained and reused in other schemes. At bidding stage, some bidders proposals involved conversion of the gymnasium building, and the proposals for the recent Music School scheme (15/05662/FUL & 15/05665/LBC) retains the lodge in their proposals.

Then there is the question, raised in the applicant's planning statement, on whether the test for demolition of the listed buildings has indeed been satisfied. We do not support the proposed hotel development and have objected to planning permission being granted. If planning permission for the scheme is not acceptable then, it follows, the substantial benefits put forward through demolition of the listed buildings would not be achievable. This would suggest that listed building consent for demolition should not be granted for the building's loss, unless a scheme for the wider site is considered acceptable.

Conclusion

We have consistently accepted that a case for the demolition and redevelopment of the gymnasium (and other ancillary buildings on the site, excluding the lodge) could be made if it enabled a sympathetic or conservation-based solution for the Hamilton building, its setting, and the remainder of the site. We do not consider the current scheme to be either sympathetic or conservation-based and therefore cannot support it. The 1997 Act places 'special regard' to the desirability of preserving the building or its setting or any features it possesses. Due to the significant adverse impact of the proposals we consider that this regard should surpass other considerations.

Thus, we are unconvinced that a justification for the demolition of the lodge and gymnasium block has been made and object to their loss.

CONCLUSION

Over the last seven years, Historic Environment Scotland, and its predecessor body, has taken part in numerous meetings, workshops, and design reviews, and as a result of these has given full and consistent advice.

That advice has not been used to inform the current proposals.

We remain fully 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.

To help assist in finding a solution for the repair and long-term sustainable use of the main Hamilton building, we have previously intimated we would agree to the loss of several of the ancillary buildings on the site were that demonstrated as necessary to help accomplish these aims. With this in mind, we have consistently noted that there was scope to redevelop the eastern part of the site with a new building similarly-scaled to the Gymnasium, provided it achieved a sympathetic conservation-based scheme for the main listed building and wider site. As part of this analysis we have always considered the provision of a large building on the western playground cannot be achieved without an unacceptably high level of impact and harm on the historic environment.

Thus, any potential solution has been difficult in the face of the applicant's desire to deliver a hotel with a considerable number of bedrooms, together with the ancillary accommodation required by a hotel of this scale, including banqueting suites, conference rooms, restaurants, leisure and spa space.

The current proposals have reduced the number of hotel rooms from 148 to 127, but the key issue remains the quantum of development on the site, especially the redevelopment of the western playground. We cannot reconcile the applicant's acknowledgment that the western playground is 'highly sensitive to change' with the proposals for it. Para 3.41 of HESPS notes that where proposals 'involve significant intervention, evidence that less intrusive options have been considered should be provided'. However, as the confined site has had to accommodate the requirements of the applicant's hotel there has been little scope for real investigation of less intrusive options. The brief has essentially led, and consequently bound, the project's design.

Although the revised proposals have reduced the height of the western extension, this is in conjunction with increased bulk to both new-build wings resulting in them being brought closer to the listed building, reducing the 'breathing space'. Both the western and eastern extensions are over a storey-height taller (between 4m and 5.4m) than the adjacent listed Hamilton building.

Whilst the current application would likely achieve the repair and reuse of the Hamilton building, it would do so at great and irreparable harm to the symmetrical neo-classical composition and its setting. It would destroy the current primacy and focus of the listed building on its site, making it subordinate to, and subsumed by, its two taller extensions. The harm to the integrity, authenticity, character and

significance of the building and its setting would be considerable. It would be impossible to view and fully appreciate Hamilton's masterpiece, either by itself or in context, without the oversized extensions taking precedence, by their scale, siting and height. The building's highly-modelled, 3-dimensional standalone set-piece design would instead be made a façade-deep piece of urban streetscape. Consequently, the proposals would, if implemented, diminish significantly the building's current status and special interest as an internationally-acclaimed exemplar of Greek Revival architecture.

As above, we remain committed to finding a new use for the Hamilton building, a significant Building at Risk. However this cannot be at the expense of the special interest and setting of the building. We are not satisfied that there is no potential for less harmful alternatives to the current scheme that can similarly achieve the repair and reuse of the building. We have not commented in detail on the proposed use of the building, as our main focus is on seeing the building repaired and reused. Clearly, however, a hotel of this scale and extent has led the current design. Other uses presented during the bidding process, or perhaps a hotel of less scale and ambition (i.e. not requiring the same amount of accommodation or ancillary space) may be possible without the same levels of harm.

In August 2016 a scheme by the Royal High School Preservation Trust (RHSPT) for St Mary's Music School was approved unanimously by your Council. We understand the scheme is fully funded and, importantly, contains no development on the western playground retaining the entrance lodge. Historic Environment Scotland did not object to this scheme.

This is not a situation where we are balancing the acceptability of two rival schemes. We judge every application on its own merits and we consider the current hotel proposals are unacceptable in their own right. However, when much of the applicant's justification depends upon their particular scheme, including the required demolition of listed buildings, being the only option that allows the repair and reuse of the building, it is essential we consider whether less adverse approaches and options are possible. This approach is outlined above in HESPS para 3.47. In other cases, these options could be tested by the market, but in this specific case we note the presence of an alternative funded scheme, with permission, that plainly shows a less harmful option is possible. We consider that this means that part c). of HESPS Para 3.47 cannot be addressed successfully and potentially means that there would be more options to reuse the building if it were offered again to the market.

To conclude; In our response to the previous application, refused by your Council in December 2015, we noted that we did not consider it possible to deliver a hotel of this scale on the site without what we regarded to be an unacceptably high level of harm to the historic environment. This remains our view. We consider that the scheme has been led by the commercial considerations within the brief rather than by what the site can accommodate. We consider the scheme represents an overdevelopment of the site and is significantly harmful to the OUV of the World Heritage Site and the character, special interest and integrity of the listed building and its setting. It would also adversely affect other heritage assets.

Furthermore, we are not satisfied that this scheme represents the only option for the future use of the Royal High School. We consider that there is potential for less harmful approaches to its reuse. This, together with the special regard that must be taken to preserve the building, its setting or features of special interest, has led to our objection.

Please contact us if you have any questions about this response. The officer managing this case is Steven Robb, who can be contacted by phone on 0131 668 8089 or by email on steven.robb@hes.scot.

Yours faithfully

Historic Environment Scotland

PREVIOUS LETTERS REGARDING THE ROYAL HIGH SCHOOL

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Letter dated November 2009

HISTORIC SCOTLAND

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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 to 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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Letter dated March 2010

HISTORIC SCOTLAND



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

Alastair Ross
Property Management and Development
City of Edinburgh Council
Waverley Court Business Centre
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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 defining 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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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

Letter dated October 2014



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Our Case ID: 201404698
24 October 2014

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 as 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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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



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.

