

**PLANNING POLICY
STATEMENT**

**The Royal High School
Preservation Trust**

December 2015

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1.0 INTRODUCTION

1.1 Montagu Evans LLP are instructed by The Royal High School Preservation Trust. This Planning Statement is submitted in support of the proposals to develop a new St Mary's Music School at the Former Royal High School.

The Applicant

1.2 The Royal High School Preservation Trust supports a fully funded vision for the future of the Royal High School building and in the relocation of St Mary's Music School. The Trust believes that the building should return to its rightful position at the cultural heart of Edinburgh, and Richard Murphy Architects' design ensures that its dramatic setting is not just protected, but enhanced.

1.3 The Royal High School Preservation Trust was formed in 2015 to seek to purchase the former Royal High School in Edinburgh for re-use as a music school. The Trust set out five aims for its proposed development of the former Royal High School, namely:-

1. **Conservation** of the main building
2. Protection of the **setting** of the site
3. An economically **sustainable** use
4. A culturally **suitable** use
5. A substantially **public** use

1.4 The Trust has sufficient funds committed to ensure both the restoration of the listed buildings and the creation of world class facilities for the music school. A conservation-based approach solution is very much proposed.

1.5 St. Mary's Music School, Scotland's leading specialist music school has outgrown its Grosvenor Crescent premises. This presents an almost unique opportunity to find a suitable new user for the former High School.

1.6 Entry to the school is by audition and assessment, based on musical ability and potential, regardless of personal financial circumstances. Edinburgh-based charity Dunard Fund has committed funds to underwrite the restoration of the Old Royal High School's listed buildings and provide world class facilities for the music school.

1.7 It is proposed that the buildings would be purchased from the Council, restored and converted to their new use at no cost to the public purse.

Background

- 1.8 Situated within a prominent location looking over the Waverley Valley and against the backdrop of Calton Hill, the site is located in the New Town Conservation Area and the Old and New Towns of Edinburgh World Heritage Site. It also forms part of a Site of Special Scientific Interest and is included in the Historic Scotland Inventory of Gardens and Designed Landscapes. St Andrews House can be found to the west and residential tenements to the east at Regent Terrace.
- 1.9 The site and properties are currently owned by the City of Edinburgh Council, however no permanent use has been found. Temporary users have occupied the former Royal High School building over the years but it has unfortunately fallen into disrepair and now appears on the Buildings at Risk Register for Scotland. The Gate Lodge has continued to be occupied by a security presence for the site and the car park is let out on a short-term basis.
- 1.10 The application site extends to include the former Royal High School building itself, the wider complex of buildings, and its grounds.
- 1.11 The principle school building is Category A listed and was designed in the Greek revival style by Thomas Hamilton in 1825-1829. The listed building group also includes a gate lodge on the north west side of the site (built 1885) and a classical style classroom block (built 1894) to the north east of the main building. The northern boundary of the former school grounds is bounded by a deep retaining wall which is also listed.
- 1.12 This planning statement is submitted in support of the detailed applications for planning permission and listed building consent that are submitted on behalf of the Trust.

Proposal of Application Notice

- 1.13 The submission of the application follows a period of pre-application consultation. The consultation has followed the protocol for major application proposals in the context of the Hierarchy of Development. The submission of the planning application follows the statutory 12 week pre-application consultation period. In accordance with the requirements of the Town & Country Planning (Development Management Procedure) (Scotland) Regulations 2009 a Proposal of Application Notice (PAN) was submitted to Edinburgh City Council on 23 April 2015.
- 1.14 The PAN (ref 15/02381/PAN) related to an application for planning permission proposing the *“conservation and adaption of former Royal High School building designed by Thomas*

Hamilton to form new premises for St Mary's Music School and adaption and demolition of later ancillary buildings essential to form new residential and practice facilities for the school" at New Parliament House, 5-7 Regent Road, Edinburgh.

- 1.15 The PAN was approved by Edinburgh City Council on 5 June 2015 and is discussed further in the accompanying Pre-Application Report.
- 1.16 It should be noted that the proposed development has subsequently been the subject of Pre Application Screening Notice.

Development Proposals

- 1.17 The proposed development relates to:-
- Conversion and adaption of the former Royal High School, Edinburgh, to form new public performance space/concert venue in conjunction with new premises for St Mary's Music School, and demolition of later ancillary buildings essential to form new residential, teaching and practice, facilities for the school (use classes 8, 10 and 11).
 - Refurbishment (external and internal) and alteration of principal former Royal High School building and pavilions, including creation of a glazed link and new basement with new glass floor to the portico, demolition of Gymnasium Block, former Classroom Block and Luncheon Hall, relocation of gatepier and associated works.
- 1.18 The proposed development results in the replacement of ancillary listed buildings. Whilst forming part of the listing, three of the later buildings on the site, namely the Gymnasium, Luncheon Hall and Classroom Block are considered of far lesser quality than the main school building allowing a return to something far closer to Hamilton's original vision of a gateway to Edinburgh's Acropolis. The accompanying Design & Access Statement seeks to analyse the site, and narrate the development of the proposals.
- 1.19 The development seeks to provide an exceptional new school building. The Trust was determined that any replacement buildings had to be an exemplar of 21st Century attitudes to design and to education. The good functioning of the school points to all teaching accommodation being on a single level and all residential accommodation on another. It is also desirable that teaching accommodation is concentrated around the centre of the school. A low level, ground hugging design, which continues the horizontality of Hamilton's design achieves these goals, whilst once again revealing Hamilton's belvedere and great retaining

wall. The fact that the new buildings are lower than the later buildings proposed for demolition reinforces the primacy of the principal building.

- 1.20 As noted in the accompanying report of PAC, a large number of respondents welcomed the proposals on the basis of enhanced public access to the site and building. Many respondents made their own suggestions as to how the buildings and spaces should be used including as performance space. Accommodating the School and allowing for such access is a key driver of the Preservation Trust. A reconfigured entrance from Regent Road and new foyer beneath the assembly hall are at the heart of the Trust's application. This ensures that the assembly hall and its two flanking rooms can act independently as fully serviced performance spaces, even when the school is in operation.
- 1.21 Additionally, to improve the overall setting of the building on Regent Road, an aspirational scheme for relandscaping and realigning the footpath and carriageway has been envisaged. The Trust have indicated that they would be willing to financially contribute to such a scheme should the City of Edinburgh Council also wish to see it implemented.
- 1.22 The proposed development is narrated in detail in the accompanying supporting Design & Access Statement.

Principle of Development

- 1.23 The Acting Head of Planning and Building Standards presented a report in advance of this planning application submission (24 June 2015), to inform the Development Management Sub-Committee of this pending application submission. There were no significant issues arising from the Committee.
- 1.24 The Development Management Sub-Committee report outlined the following key issues against which the planning application would be assessed:-
- The acceptability of the principle of development having regard to the development plan;
 - The impact on the historic environment;
 - The design and layout of the proposals within the character of the area; and if the proposal complies with Edinburgh Design Guidance;
 - The proposals safeguard of the site's landscape setting and natural heritage;
 - Access arrangements are acceptable in terms of road safety and public transport accessibility;
 - Any other environmental factors that require consideration.

Planning History

- 1.25 By way of background there are a number of various and relatively minor planning permissions and consent that relate to the development site. Dating back to 2004, these include applications for temporary uses and the erection of portacabins. The following are considered relevant to the current development proposals. Two applications for more major development are currently pending consideration, and are noted below:-
- **Ref No: 15/03989/FUL** Change of use, alterations and restoration of principle former Royal High School building and pavilions (original Thomas Hamilton-designed school buildings), demolition of ancillary buildings including the former Gymnasium Block and lodge, new build development, new/improved vehicular, service and pedestrian accesses, landscaping, parking, public realm and other works to create a world class hotel of international standing with associated uses (including publicly accessible bars (public house) and restaurants (Class 3)). **Pending Consideration**
 - **Ref No: 15/03990/LBC** Refurbishment (external and internal), alteration and extension of principal former Royal High School building and pavilions, demolition of former Lodge, Gymnasium Block, demolition of 2 curtilage buildings (former Classroom Block and Luncheon Hall), demolition of existing gates, wall (in part) and formation of new service access. **Pending Consideration**
- 1.26 This Planning Policy Statement seeks to assess the proposed development in the context of the Development Plan.
- 1.27 The application for planning permission and listed building consent is supported by a suite of other supporting documents including a Conservation Plan, the Design & Access and Environmental Statement.

2.0 PLANNING POLICY CONTEXT

2.1 Section 25 of the Town and Country Planning (Scotland) Act 1997, as amended by the Planning Etc. (Scotland) Act 2006, requires that planning decisions be made in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan

2.2 The Development Plan, for the site, comprises of the Strategic Development Plan (SDP) for South East Scotland (SESplan), which was approved by Scottish Ministers, with modifications on 27 June 2013, and the Edinburgh City Local Plan, which was adopted in January 2010.

2.3 The current adopted Local Plan predates the publication of SESplan. The Council are in the process of preparing a new Local Development Plan. The Proposed Plan is a significant material consideration when assessing forthcoming planning applications. A number of material considerations relevant to the proposed development are considered in the following section of this statement including SPP, SHEP and the emerging Local Development Plan.

SESplan

2.4 The purpose of the SDP is stated as being to set out a clear definition for the future development of the SESplan area where a spatial strategy is promoted.

2.5 Paragraph 8 of the SDP notes that South East Scotland is the main growth area and the key driver of the Scottish economy. At its heart is Edinburgh, a leading European city which is the hub of the regional and national economy providing a wide range of services as Scotland's Capital City.

2.6 The Vision for this SDP is that:-

“By 2032, the Edinburgh City Region is a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business.”

2.7 The Aims of the SDP have been developed to deliver the Vision. These are noted, *inter alia*, as being to:-

- Enable growth in the economy by developing key economic sectors, acting as the national hub for development and supporting local and rural development.

- Integrate land use and sustainable modes of transport, reduce the need to travel and cut carbon emissions by steering new development to the most sustainable locations.
 - Conserve and enhance the natural and built environment.
 - Promote the development of urban brownfield land for appropriate uses.
 - Contribute to the response to climate change through mitigation and adaption and promote high quality design / development.
- 2.8 The SDP refers at Paragraph 12 to the high quality built and natural environment of the SESplan area reflecting how this underpins its desirability as a place to live, work, do business and visit and can contribute to improving health and wellbeing. The SDP continues to note that maintaining and enhancing these special qualities in the context of further growth will be vital to ensure the future prosperity of the area.
- 2.9 The SDP Spatial Strategy sets out a framework for the SESplan area to take forward the Vision and Aims of the SDP. This focuses further development along preferred corridors optimising connectivity and access to services and jobs. It is stated that new development proposals will complement and not undermine the delivery of existing committed development. The Spatial Strategy aims to encourage key development sectors and promote a sustainable growth pattern.
- 2.10 The Spatial Strategy sets out locational priorities for development up to 2024 and gives a broad indication of the scale and direction of growth up to 2032. In terms of the economy, the Scottish Government has set out that its central purpose is to increase sustainable economic growth, with the SDP taking a more pro-active role.
- 2.11 Policy 1A states that the Spatial Strategy of this SDP builds on existing committed development and identifies five Sub Regional Areas – one of these being the Regional Core. Edinburgh lies at the heart of the Regional Core and is the main driver of the SESplan economy and forms an important centre of economic activity.
- 2.12 Policy 1B sets out the Spatial Strategy Development Principles and notes that Local Development Plans will:-
- Ensure that there are no significant adverse impacts on the integrity of international, national or local designations and classifications, in particular National Scenic Areas, Special protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Great Landscape Value and any other Phase 1 Habitats or European Protected Species;

- Ensure that there are no significant adverse impacts on the integrity of international or national built or cultural heritage sites in particular World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Royal Parks and Sites listed in the Inventory of Gardens and Designed Landscapes;
- Have regard to the need to improve the quality of life in local communities by conserving and enhancing the natural and built environment to create more healthy and attractive places to live;
- Contribute to the response to climate change, through mitigation and adaption; and
- Have regard to the need for high quality design, energy efficiency and the use of sustainable building materials.

2.13 Consistent with the themes of the SDP Spatial Strategy, the proposed development would result in the sensitive reuse of a key urban brownfield site with significant potential to integrate land use and transport, reducing the need to travel.

2.14 In accordance with Policy 1B, the proposals seek to respond positively to the sensitive location of the site and its importance in the city context having regard to the impact of the development on the numerous designations. By improving access to the public, it is considered that the development proposals have the potential to significantly improve life both within the local community and wider sense very much conserving and enhancing the natural and built environment. The development represents a high quality and sustainable design.

2.15 It is submitted that the proposed development is entirely consistent with the themes of the Strategic Development Plan.

Edinburgh City Local Plan

2.16 The Edinburgh City Local Plan (ECLP) was adopted in January 2010. The ECLP seeks to shape planning decisions and influences public and private investment in homes, businesses, shops, infrastructure and facilities, and provides a land use framework consistent with the provisions of the then structure plan.

2.17 The purpose of the ECLP is noted as being to:-

- Provide a clear basis for determining planning applications;
- Allocate land to meet needs and targets set out in the Structure Plan;
- Provide a clear framework for regeneration strategies prepared by the Council, other public sector agencies and developers; and

- Provide support for wider strategies of the Council, particularly the Local Transport Strategy, and help infrastructure providers to plan for the future.

2.18 The Core Aims of the Plan include:-

- Encouraging high quality, sustainable development which strengthens the city's economy and role as a capital city and enhances its economic competitiveness;
- Promoting the highest standards of architectural and urban design and encouraging innovation;
- Protecting the built and natural heritage of the city and having special regard for the impact of new development on the World Heritage Site;
- Encouraging shopping and other complementary facilities in locations convenient to serve residents, workers and visitors; and
- Ensuring the provision of transport, educational and other necessary infrastructure to meet needs and encourage the provision of a wide range of leisure, recreational and visitor facilities in accessible locations.

2.19 Within the adopted ECLP, the site is identified as being located within the defined Central Area, where Policy Ca 1 – The Central Area applies. The site also lies within the World Heritage Site and the New Town Conservation Area.

2.20 In terms of City Centre regeneration, the objective of the Local Plan is *“to protect and promote the vital mix of government, cultural, business, retail and leisure uses in the city centre which together with housing, its open spaces and its World Heritage historic environment are at the heart of Edinburgh’s unique character and roles as a capital city and major regional service centre.”*

2.21 Policy Ca 1 summarises the broad types of development that will be acceptable in the city centre (Central Area). It notes that development in the central area will be permitted which maintains and enhances the character, attractiveness, vitality and accessibility of the city centre and contributes to its role as the regional service centre and Edinburgh’s role as a capital city. The requirements in principle will be for:-

- a) Comprehensively designed proposals which maximise the potential of the site in accordance with any relevant site development brief and/or other guidance;*
- b) A use or a mix of uses appropriate to the location of the site, its accessibility characteristics and the character of the surrounding area;*
- c) A contribution to the proposed tram network if required and for the provision of any other measures and facilities made necessary by the development including a*

contribution to the improvement of the public realm in the immediate vicinity of the site;

d) The creation of new civic spaces and traffic-free pedestrian routes where achievable.

2.22 The following table sets out the key relevant policies of the ECLP.

Edinburgh City Local Plan Policies	
Policy Category	Policy Reference
Design Principles	Des 1 Design Quality and Context
	Des 3 Development Design
	Des 6 Sustainable Design and Construction
Caring for the Environment	Env 1 World Heritage Site
	Env 2 Listed Buildings – Demolition
	Env 3 Listed Buildings – Setting
	Env 4 Listed Buildings – Alterations and Extensions
	Env 5 Conservation Areas – Demolition
	Env 6 Conservation Areas – Development
	Env 7 Historic Gardens and Designed Landscapes
	Env 11 Landscape Quality
	Env 14 Sites of National Importance
	Env 15 Sites of Local Importance
Transport and other Network Services	Tra 1 Location of Major Development
City Centre Regeneration	Ca 1 The Central Area

Policy Des 1 – Design Quality and Context

2.23 Policy Des 1 seeks high quality, sustainable design, drawing on characteristics of the surrounding area, to create or reinforce a sense of place, security and vitality. Planning permission will not be granted for poor quality or inappropriate design or for proposals that would be damaging to the character or appearance of the area around it, particularly where this has a special importance.

Policy Des 3 – Development Design

2.24 Policy Des 3 sets out a number of criteria, including that development should have a positive impact on its setting and should not harm the amenity of neighbours.

Policy Des 6 – Sustainable Design and Construction

2.25 Policy Des 6 encourages new buildings to be designed and constructed so as to reduce their energy demands and minimise their adverse effects.

- 2.26 The accompanying Sustainability Statement considers the sustainable design and construction principles proposed within the development.
- 2.27 Design and design-related issues are considered in detail within the accompanying Design and Access Statement.
- 2.28 The quality of the design solution is as fundamental to the Preservation Trust's aspirations for the site, as it is to planning policy. The Design and Access Statement submitted in support of the proposed development considers the site as a whole, presenting an architectural analysis, and considering in detail the approach.
- 2.29 Working with Richard Murphy Architects in accordance with policy Des 6 the sustainability credentials of the development have been an important consideration in developing the proposals. Sustainability Form S1 is submitted in support of the proposed development, and technical appendices of the ES consider the issue.

Policy Env 1 – World Heritage Site

- 2.30 Policy Env 1 has been introduced to the Edinburgh City Local Plan with the aim of protecting the setting of the World Heritage Site. Development which would harm the qualities of the Old and New Towns of Edinburgh as a World Heritage Site or would have detrimental impact on the site's setting will not be permitted.

Policy Env 2 – Listed Buildings - Demolition

- 2.31 Policy Env 2 notes that proposals for the total or substantial demolition of a listed building will only be supported in exceptional circumstances and should take into account:-
- a) *The condition of the building and the cost of repairing and maintaining it in relation to its importance and to the value to be derived from its continued use;*
 - b) *The adequacy of efforts to retain the building in, or adapt it to, a use that will safeguard its future, including its marketing at a price reflecting its location and condition to potential restoring purchasers for a reasonable period;*
 - c) *The merits of alternative proposals for the site and whether the public benefits to be derived from allowing demolition outweigh the loss.*

Policy Env 3 Listed Buildings – Setting

- 2.32 Policy Env 3 notes that development within the curtilage or affecting the setting of a listed building will be permitted only if not detrimental to the appearance or character of the building, or to its setting.

Policy Env 4 – Listed Buildings – Alterations and Extensions

- 2.33 The policy states that proposals to alter or extend a listed building will be permitted where those alterations or extensions are justified, will not cause any unnecessary damage to historic structures or diminish its interest and where additions are in keeping with other parts of the building.

Policy Env 6 – Conservation Areas – Development

- 2.34 Policy Env 6 notes that development within a Conservation Area or affecting its setting will be permitted only where it preserves or enhances the special character or appearance of the conservation area and demonstrates high standards of design, utilising materials appropriate to the historic environment.

Policy Env 7 – Historic Gardens and Designed Landscapes

- 2.35 Policy Env 7 states that development will not be permitted which would have a detrimental impact on the character of a site recorded in the Inventory of Gardens and Designed Landscapes, upon important views to, from and within the site, or upon component features which contribute to its value.

Policy Env 11 – Landscape Quality

- 2.36 The policy states that planning permission will not be granted for development which would damage or detract from the overall character and appearance of the Areas of Great Landscape Value shown on the Proposals Map, prominent ridges, or other important topographical or landscape features.

Policy Env 14 – Sites of National Importance

- 2.37 Policy Env 14 states that development which would affect a Site of Special Scientific Interest (other than a European Site) will only be permitted where an appraisal has demonstrated that:-

- a) *The objectives of the designation and the overall integrity of the area will not be compromised; or*
- b) *Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social or economic benefits of national importance.*

Policy Env 15 – Sites of Local Importance

- 2.38 The policy states that development likely to have an adverse impact on the flora, fauna, landscape or geological features of a Local nature Reserve or a Local Nature Conservation Site will not be permitted.
- 2.39 The impact of the proposals on the setting of the listed buildings and conservation area has remained a key consideration throughout the design process. The accompanying Design & Access Statement seeks to analyse the site, and narrate the development of the proposals.
- 2.40 The Cultural Heritage chapter of the ES considered the likely significance of effects on the cultural heritage associated with the site, including in the context of the historic landscape and other primary designations.
- 2.41 A Conservation Plan prepared by Simpson and Brown accompanies the application submission. The cultural significance of the site is noted as outstanding, in particular the principal elevations of the Hamilton Building. A detailed analysis of significance, however, makes the case that specific elements of the site are of lesser significance.

Policy Tra 1 – Location of Major Development

- 2.42 The policy notes that planning permission for development which would generate significant travel demand will be permitted on suitable sites in the Central Area. In general, applicants should demonstrate that the location proposed is suitable with regard to access by public transport, cycling and walking.
- 2.43 A transport statement accompanies the application submission. The site is well located to support sustainable travel patterns given its close proximity to existing key travel nodes, public transport services, residential areas and walking and cycling routes in the area.

Summary

- 2.44 A suite of documents including the ES, Design and Access Statement and Conservation Plan outlines the approach in developing the proposal. The approach is considered to reflect the adopted policy requirements.
- 2.45 Particular regard has been paid to delivering a high quality development reflective of the sensitivities of the site and its surrounds.
- 2.46 Landscape considerations form a key element of the proposals; public access and use being a key theme of the development.
- 2.47 The proposed development is considered to be sympathetic to the principle listed building and wider world heritage site whilst taking full advantage of its location within the city centre.

Conclusion

- 2.48 The application proposals have been assessed against the relevant policies of the Development Plan. It is considered that the proposals accord with the Development Plan.
- 2.49 Design and design related issues, in this context, are considered in detail in the accompanying Design & Access Statement. The Design & Access Statement considers the quality of the solution proposed to be developed.
- 2.50 The impact of the proposals on the setting of the listed building and Conservation Area has remained a key consideration throughout, as has the location of the site within Edinburgh's World Heritage Site.
- 2.51 The proposals to introduce flexibility, in terms of uses proposed, is wholly compliant with the policies of the plan that seek to enhance the vitality and viability of the Central Area.
- 2.52 Having assessed the application proposals against the development plan we submit that the proposals are in accordance with the development plan.

3.0 MATERIAL CONSIDERATIONS

3.1 Having concluded that the application proposals accord with the development plan, Section 25 requires the assessment of the proposals against material considerations. The following material considerations are considered relevant to the proposed development:-

- National Planning Framework 3
- Scottish Planning Policy
- Second Proposed Local Development Plan
- Scottish Historic Environment Policy
- Edinburgh World Heritage Site Management Plan
- Block 10 Development Brief
- Calton Hill Conservation Plan
- The New Town Conservation Area Character Appraisal
- Edinburgh Design Guidance

National Planning Framework 3

3.2 The Scottish Government published the National Planning Framework (NPF) 3 on 23 June 2014. The NPF sets out the Scottish Government's central purpose which is *"to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth."*

3.3 The NPF sets out its vision for Scotland to be:

- A successful, sustainable place;
- A low carbon place;
- A natural resilient place;
- A connected place

3.4 One of the aims of NPF 3 is to create high quality, diverse and sustainable places that promote well-being and attract investment.

3.5 The application proposals are considered to contribute to this broad aim and accord with the Government's central purpose, and its vision for Scotland, by helping to create a high quality, diverse and sustainable place that will promote well-being and attract investment.

Scottish Planning Policy

- 3.6 The Scottish Government published a revised Scottish Planning Policy (SPP) on 23 June 2014. The SPP introduces a presumption in favour of development that contributes to sustainable development and also encourages a design-led approach.
- 3.7 Paragraph 37 of SPP notes the Government's policy statement on architecture and place for Scotland, Creating Places, and emphasises that quality places are successful places.
- 3.8 SPP states (at paragraph 39.) that "*planning should direct the right development to the right place.*"
- 3.9 Paragraph 141 states that changes to a listed building should be managed to protect its special interest while enabling it to remain in active use. It continues that where planning permission and listed building consent are sought for development to, or affecting, a listed building, special regard must be given to the importance of preserving and enhancing the building, its setting and any features of special architectural or historic interest. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the character and appearance of the building and setting.
- 3.10 Paragraph 147 notes that World Heritage Sites are of international importance. Where a development proposal has the potential to affect a World Heritage Site, or its setting, SPP notes that the planning authority must protect and preserve its Outstanding Universal Value.
- 3.11 It is considered that the development is supported by SPP. As previously noted the Trust believes that the building should return to its rightful position at the cultural heart of Edinburgh. Whilst the proposed development results in the replacement of ancillary listed buildings, the design solution seeks to ensure that the setting of the principle school building is both protected and enhanced. An assessment of the heritage impact is informed by the accompanying Cultural Heritage chapter of the ES together with the Townscape and Visual Impact Assessment.

Second Proposed Local Development Plan

- 3.12 The Edinburgh Local Development Plan – Proposed Plan was published in March 2013. Following the publication of the Proposed Plan, modifications to the Strategic Development Plan prompted the preparation of the Second Proposed LDP. The Second Proposed LDP was submitted to Scottish Ministers on 29 May 2015 for examination.

- 3.13 The LDP strategy directs future growth to four Strategic Development Areas – including major redevelopment opportunities in the City Centre. The Plan continues to promote the reuse of previously developed land.
- 3.14 In relation to the City Centre, the LDP notes that Edinburgh's city centre is the vibrant hub of the city region – it's the regional shopping centre and an important tourist destination with a wide range of entertainment and cultural attractions. It continues to note that it has excellent public transport connections and provides employment for over 80,000 people and that Edinburgh city centre's stunning setting and iconic architecture is celebrated internationally. It incorporates Scotland's only urban World Heritage Site and many listed buildings and important green spaces. The city centre is also an area where people live, with a wide range of housing types and styles contributing to its character.
- 3.15 It is stated at Paragraph 104 that the plan aims to ensure that development in the city centre achieves the right balance between a number of competing priorities – from realising its economic potential, to protecting its built and natural heritage, from promoting its role as a capital city to making it an attractive place to live.
- 3.16 The policies of the next LDP reflect, in the main, those of the adopted plan. The more relevant policies are noted below:-

Policy Del 3 – City Centre

- 3.17 Policy Del 3 states that development in the City Centre as defined on the Proposals Map will be permitted which maintains and enhances its character, attractiveness, vitality and accessibility and contributes to its role as a strategic business and regional shopping centre and Edinburgh's role as a capital city. The requirements in principle will be for:-
- a) *Comprehensively designed proposals which maximise the potential of the site in accordance with any relevant development principles, development brief and/or other guidance;*
 - b) *A use or a mix of uses appropriate to the location of the site, its accessibility characteristics and the character of the surrounding area;*
 - c) *Where practicable, major mixed use developments should provide offices, particularly on upper floors. At street level, other uses may be more appropriate to maintain city centre diversity, especially retail vitality on important shopping frontages;*
 - d) *The creation of new civic spaces and traffic-free pedestrian routes where achievable.*

- 3.18 This policy guides development in the City Centre to ensure proposals provide an appropriate mix of uses and are of a high quality of design taking account of the characteristics of the historic environment.

Policy Des 1 – Design Quality and Context

- 3.19 Planning permission will be granted for development where it is demonstrated that the proposal will create or contribute towards a sense of place. Design should be based on an overall design concept that draws upon positive characteristics of the surrounding area.
- 3.20 Planning permission will not be granted for poor quality or inappropriate design or for proposals that would be damaging to the character or appearance of the area around it, particularly where this has a special importance.
- 3.21 This policy applies to all new development, including alterations and extensions. It is expected that new development is of a high standard of design and also aims to encourage innovation in the design and layout of new buildings.

Policy Des 8 – Public Realm and Landscape Design

- 3.22 Policy Des 8 relates to Public Realm and Landscape Design and states that planning permission will be granted for development where all external spaces, and features, including streets, footpaths, civic spaces, green spaces boundary treatments and public art have been designed as an integral part of the scheme as a whole, and it has been demonstrated that:-
- a) *The design and materials used are appropriate for their intended purpose, to the use and character of the area generally, especially where this has a special interest or importance;*
 - b) *The different elements of paving, landscaping and street furniture are coordinated to avoid a sense of clutter;*
 - c) *Particular consideration has been given, if appropriate, to the planting of trees to provide a setting for buildings, boundaries and road sides and create a robust landscape structure;*
 - d) *A satisfactory scheme of maintenance will be put in place.*
- 3.23 The proposed development is considered to comply fully with policy Del 3 of the Local Development Plan, contributing significantly to Edinburgh’s role as a capital city not least culturally and indeed publicly. The proposed development seeks to reflect the Council’s own guidance for the development of the site considered further within this statement.

- 3.24 The development reflects the requirements of policy Des 1 and Des 8 of the LDP, advancing an overall design and landscape vision for the wider site and seeking to create civic spaces and places as integral to the scheme.
- 3.25 Regard has been given to the emerging LDP in developing the proposals. The proposals are considered to fully accord with the provisions of the emerging LDP.

Scottish Historic Environment Policy (SHEP) (2011)

- 3.26 The *Scottish Historic Environment Policy* (SHEP) document sets out Scottish Minister's policies for the historic environment, provides greater policy direction for Historic Environment Scotland and provides a framework that informs the day-to-day work of a range of organisations that have a role and interest in managing the historic environment. The SHEP complements and has the same authority as the Scottish Planning Policy and other relevant Ministerial policy documents and consequently a relevant document in statutory planning.
- 3.27 It is noted within SHEP that the protection of the historic environment is not about preventing change. It continues that *"Ministers believe that change in this dynamic environment should be managed intelligently and with understanding, to achieve the best outcome for the historic environment and for the people of Scotland."*
- 3.28 The protection and enhancement of the historic environment contributes to the Scottish Government's central purpose, which is noted as being *"to focus government and public services on creating a more sustainable country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth."* To support that, the Scottish Government has identified as a national outcomes that *"We value and enjoy our built and natural environment and protect and enhance it for future generations."* Scottish Ministers will therefore take account of the wider sustainability agenda in all their decisions on matters relating to the historic environment.
- 3.29 Scottish Ministers within SHEP set out the following principles:
- a) Realise the full potential of the historic environment as a resource – cultural, educational, economic and social – across every part of Scotland and for all the people;
 - b) Make the best use of the historic environment to achieve their wider aims of economic and social regeneration;

- c) Identify the many aspects of our environment and protect and manage them in a sustainable way to secure their long-term survival and preserve their embodied energy;
- d) Understand full all aspects of the historic environment, and their condition and inter-relationships
- e) Broaden access to the historic environment and break down intellectual, physical and economic barriers;
- f) Ensure that effective systems underpinned by appropriate legislation and information are in place to conserve and manage the historic environment.

3.30 It is stated that Scottish Ministers are also determined to achieve three key outcomes for Scotland's historic environment by putting in place a strategic policy framework for the historic environment, investing in its delivery and working in partnership with others:

- Key Outcome 1: that the historic environment is cared for, protected and enhanced for the benefit of our own and future generations
- Key Outcome 2: to secure greater economic benefits from the historic environment
- Key Outcome 3: the people of Scotland and visitors to our country value, understand and enjoy the historic environment

3.31 SHEP notes that listed buildings are protected under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, which establishes that any work which affects the character of a listed building will require listed building consent. In assessing an application for listed building consent, it continues, the planning authority is required to 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.

3.32 The policy notes that the majority of listed buildings are adaptable and have met the needs of successive generations whilst retaining their character. Change should therefore be managed to protect a building's special interest while enabling it to remain in active use. Each case must be judged on its own merits but in general terms' listing rarely prevents adaption to modern requirements but ensures that work is done in a sensitive and informed manner.

3.33 Where the application proposes the demolition of a listed building, applicants will be expected to provide evidence to show that:

- a) The building is not of special interest; or
- b) The building is incapable of repair; or
- c) The demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or

- d) The repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period

3.34 The Cultural Heritage chapter of the ES and Conservation Plan contribute toward the justification of the demolitions proposed as part of the development. Taking each policy test in turn we would comment as follows:-

a) The building is not of special interest; or

Section 4.3 (Architectural, Aesthetic and Artistic Significance) of the Conservation Plan states that:-

Robert Wilson's gymnasium and classroom block of 1885 and 1894 is now of lesser significance, largely as a result of less sensitive alterations since the school closed, but also because it is an awkward hybrid of two phases of development, neither of which are demonstrative of Robert Wilson's skill in school design. There are many examples of Robert Wilson's designs elsewhere in the city that are better examples of his practice. Nevertheless, when first constructed, there were some features of note, and he did cleverly repeat elements of Hamilton's designs, both in interior fixtures, and in the general form of the building that mirrors the main Hamilton Building. It is unfortunate that this building was built in front of Hamilton's belvedere tower and retaining wall which is not visible, and largely covered in vegetation – as parts of Hamilton's original scheme, these are arguably of greater architectural significance.

The craft and luncheon hall block is not of any architectural or aesthetic significance.

The 1946 classroom block is poor quality and detracts from the site.

Section 6.2 (Graded Elements) of the Conservation Plan states that the overall grading of significance (based on a scale defined in section 6.1) of the three buildings are as follows:-

- Gymnasium block: moderate significance (*A building or element of local (Edinburgh) importance, or an element that contributes to, but is not a key element to the importance of the building or site overall.*)
- Luncheon Hall block: neutral significance (*An element which neither contributes, nor detracts from the importance of the building or site overall.*)

- Classroom block: negative significance (*A building or element which detracts from the overall significance of the building or site overall.*)

The gymnasium block is the only one of the three buildings that is argued to have some significance.

The luncheon hall block is another multi-phase building but is not deemed to be of architectural interest. It does not have any negative impact on the site, however, and was a good quality addition to the site. It is therefore of neutral significance, and it would therefore not have any impact on the overall significance of the site if it were to remain or if it were to be demolished. However, its removal would allow for a new building that provides the accommodation that is required on the site.

The classroom block is a poor quality building of no architectural merit, and the significance of the overall site would be enhanced were it to be demolished. It would return the open space between the gate lodge and Hamilton Building, and further reveal the retaining wall that delineates the boundary of the site.

The development seeks to provide an exceptional new school building. The Trust was determined that any replacement buildings had to be an exemplar of 21st Century attitudes to design and to education. The good functioning of the school points to all teaching accommodation being on a single level and all residential accommodation on another. It is also desirable that teaching accommodation is concentrated around the centre of the school. A low level, ground hugging design, which continues the horizontality of Hamilton's design, achieves these goals, whilst once again revealing Hamilton's belvedere and great retaining wall. The fact that the new buildings are lower than the later buildings proposed for demolition reinforces the primacy of the principal building.

b) The building is incapable of repair; or

This criterion has not been considered in the context of the proposals.

c) The demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or

As noted above, the gymnasium block is the only one of the three buildings that is argued to have some significance. As noted by Simpson and Brown this echoes earlier studies including the 2004 Conservation Plan by LDN which stated that it was

of some level of significance. As stated above, the building was carefully designed by an architect of some note, but it was built in two phases which were not entirely coherent in design. The building has been further altered and it is argued that it has lost some of its significance. The conservation plan that appends this application and the 2004 conservation plan both argue that elements of moderate, or some, significance can be altered or removed if a sound argument is made. In this instance, the removal of the gymnasium block is seen as acceptable as it allows for a more appropriate building to be built in its place, and allows for an element of greater significance – Hamilton’s belvedere tower – to be more fully appreciated as part of the original setting of the main Hamilton Building.

In responding to other current proposals for the site Historic Environment Scotland note in correspondence that they *“have previously accepted that a case for the demolition and redevelopment of the gymnasium could be made if it enabled a conservation-based solution for the remainder of the site....”* They continue that they *“still believe a case could be made....”*

Clearly the proposed development results in the replacement of ancillary listed buildings. Whilst forming part of the listing, these are considered of far lesser quality than the main school building. The proposal seeks to make a virtue of their removal and replacement allowing a return to something far closer to Hamilton's original vision of a gateway to Edinburgh's Acropolis.

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The Trust set out five aims for its proposed development of the former Royal High School, namely:-

1. Conservation of the main building
2. Protection of the setting of the site

3. An economically sustainable use
4. A culturally suitable use
5. A substantially public use

The Trust has sufficient funds committed to ensure both the restoration of the listed buildings and the creation of world class facilities for the music school. A conservation-based approach solution is very much proposed.

d) The repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition to potential restoring purchasers for a reasonable period

This criterion has not been considered in the context of the proposals.

- 3.35 SHEP provides that one of the tests requires to be met in evidencing the demolition of a listed building. It is considered that SHEP test (a) applies to the proposed demolition of the Classroom and Luncheon Block and SHEP test (c) applies to the proposal to demolish the Gymnasium Block.

Edinburgh World Heritage Site Management Plan

- 3.36 The Old and New Towns of Edinburgh World Heritage Site Management Plan was prepared in 2011. The purpose of the Management Plan is noted as being to provide a framework for the management of the Edinburgh Old and New Towns World Heritage Site that will sustain its outstanding universal value.
- 3.37 The Statement of Outstanding Universal Value is detailed from paragraph 3.5 of the Management Plan, the key to which is stated as being “*the remarkable juxtaposition of two clearly articulated urban planning phenomena.*” The contrast between the organic medieval Old Town and the planned Georgian New Town, it continues, provides clarity of urban structure unrivalled in Europe.
- 3.38 It is noted at paragraph 3.21 that the Scottish Historic Environment Policy (SHEP) is the primary policy guidance on the protection and management of the historic environment in Scotland. It is further stated that Scottish Planning Policy (SPP) sits alongside the SHEP and includes the Government’s national planning policy on the historic environment, and that it provides for the protection of World Heritage Sites by considering the impact of development on the Outstanding Universal Value, authenticity and integrity. It continues that local policies specifically protecting the property are contained within the Edinburgh City Local Plan.

- 3.39 The accompanying Cultural Heritage chapter of the ES together with the Townscape and Visual Impact Assessment seek to assess the impact of the proposed development on the City informed by the Conservation Plan submitted in support.

Block 10 Development Brief

- 3.40 The Council's Development Brief follows on from the Planning Committee approval of the City Centre Princes Street Development Framework (CCPSDF) on 4 October 2007. The CCPSDF sets out three key development principles based on reconciling the needs of the historic environment with contemporary users, optimising the site's potential through retail-led mixed uses and creating a high quality built environment and public realm.
- 3.41 The purpose of the development brief is to set out the main planning and development principles on which development proposals for the area should be based.
- 3.42 The Brief states that Block 10 occupies a strategic location between the Old Town and the eastern edge of the city centre. The block has the potential to deliver a cultural and visitor destination and become a key connection between the existing and emerging developments within the Old Town and the St James Quarter.
- 3.43 Block 10 is largely within the New Town Conservation Area and extends south into the Old Town Conservation Area at Calton Road. It also lies entirely within the UNESCO inscribed World Heritage Site. Whilst the designation of the site does not carry any additional planning powers or controls, the impact of any proposed development on the site will be a material consideration in the determination of planning applications.
- 3.44 The brief notes that the former Royal High School building has access difficulties which raise issues for any proposed public use. Sensitively designed proposals to improve access and permeability will be encouraged. Solutions which make use of the wings of the building and exploit the changes in level will be considered where they respect the symmetry, classical power and simplicity of the building.
- 3.45 In particular it is stated that the setting of the former Royal High School will be a key consideration in assessing any development proposals which come forward.
- 3.46 The brief states the desire to support the viable reuse of the High School and campus buildings as a cultural destination and encourage activity within this part of the city. Suggested uses include: tourist orientations / information hub; cultural / museum / exhibitions spaces; amenity / leisure uses; visitor facilities and; hotel / hospitality uses and residential use. A mix

of uses is promoted to complement and support the long term use of the site and create a destination in its own right.

- 3.47 A new area of public realm is promoted to the front of the Royal High School on Regent Road within the development brief. This public realm will be located and designed to give priority to pedestrians, to take maximum advantage of the views and to create outdoor space physically and visually linked to the existing campus and buildings. The objective is to enhance the setting of the campus buildings while promoting their reuse by making the site more publicly accessible.
- 3.48 The development brief identifies opportunities for improved connections within the area which will help knit together the emerging development areas of Caltongate and the St James Quarter. The overall objective of the development brief is to enable a viable long term reuse of the former Royal High School. The reuse of the buildings should take advantage of its history and association with the Scottish Enlightenment and deliver a world class visitor facility and museum/gallery space. To support this reuse, the brief prioritises reconnecting this forgotten area of the city in order to create a destination in its own right.
- 3.49 We would submit that the proposed development very much reflects the principles of the brief, particularly in respect of the viable reuse of the High School and campus as a cultural destination and envisaging significant public realm enhancements.

Calton Hill Conservation Plan

- 3.50 The cultural significance of Calton Hill is recognised within the document by its designation as part of the Edinburgh World Heritage Site by UNESCO in December 1995, its designation as a Site of Special Scientific Interest by Scottish Natural Heritage, and the statutory listing of many of its buildings and monuments as being of national historical and architectural interest by Historic Scotland.
- 3.51 The Conservation Plan, revised in 2002, noted that the future of the former Royal High School was inextricably linked to that of Calton Hill. Various proposals for its use are suggested including an interpretative centre for the Hill, a centre for the study of the Scottish Enlightenment and committee accommodation related to the new Scottish Parliament. It is a common consensus within the Plan that the future use should reflect its importance and make it more accessible to as many members of the public as possible.
- 3.52 Very much reflecting the nature of the proposed development, the Plan states that sympathetic change, reflecting the needs and aspirations of our time, is possible but it must be

in the context of protecting, enhancing and revealing its cultural significance. The Plan then goes on to outline policy measures for the conservation of Calton Hill. The following are of relevance to the Royal High School building:-

- An appropriate sustainable long-term use for the former Royal High School must be identified. Such a use must reflect the exceptional cultural significance of the building and its physical and symbolic relationship to Calton Hill;
- The former Royal High School is an integral part of any presentation and interpretation of Calton Hill;
- Any future use of the former Royal High School should safeguard and encourage public access.

The New Town Conservation Area Character Appraisal

3.53 The Conservation Area Character Appraisal 2005 notes that Section 61 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, describes Conservation Areas as *“areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.”*

3.54 The character appraisal outlines the attributes which give the conservation area its status. In terms of the Royal High School and its setting, the Calton skyline embellished with its distinguished ensemble of monuments, enhanced Edinburgh’s identity as the Athens of the North. Within the Conservation Area, the existing architectural character, historic and landscape character is to be preserved and enhanced.

3.55 The proposed development is considered to very much reflect the issues highlighted in the 2008 Development Brief not least in supporting the viable reuse of the building, being sympathetic to the key buildings themselves and seeing to enhance public realm both on the site and beyond. The development therefore reflects the conservation plan and character appraisal.

Edinburgh Design Guidance

3.56 This guidance, dated 2013, sets out the Council’s expectations for the design of new development in Edinburgh. The Council wants new development to achieve the highest quality of design and to integrate well with the existing city.

3.57 The guidance describes Edinburgh as a unique and beautiful city – recognised by the UNESCO inscription of its Old and New Towns as a World Heritage site. Its distinct geography

and rich and varied heritage of buildings and urban design combine to create a cityscape of excellence. It is a city that has embraced change, and a city of startling contrast – between its landscape and buildings and in its streets and spaces.

- 3.58 It is noted that landscape is vitally important where Edinburgh’s hills create some of the most memorable aspects of its setting. Castle Hill, Arthur’s Seat, Calton Hill and others create a three dimensional city. Not only do they dominate views throughout the city, but they also create vistas, allowing the city to be seen and understood from a series of different vantage points.
- 3.59 The design guidance states the desire to maintain and enhance the combination of natural and built heritage, where it is noted that the quality of our environment undoubtedly contributes towards Edinburgh’s success as an international city that people and businesses are attracted to. For this to remain the case, it is vitally important that we continue to respect our existing built fabric. In doing so, Edinburgh should not become a museum piece. Instead, the city must continue to embrace change so that it can adapt to its evolving needs.
- 3.60 Reflective of the considerations given to informing the proposed development the document is broken down into three sections which outline measures to be considered within new development proposals:

Context and design

The key aims are for new development to:-

- *Demonstrate an understanding of the unique characteristics of the city and the context within which it is located*
- *Reinforce its surrounding by conserving and enhancing the character and appearance of the landscape and townscape; including protecting the city’s skyline and locally important views*
- *Ensure that adjacent development sites are not compromised and there is a comprehensive approach to layout*
- *Provide appropriate densities depending on their existing characteristic*
- *Incorporate and use features worthy of retention, including natural features, buildings and views*

Designing buildings

The key aims are for new development to:-

- *Have a positive impact on the immediate surroundings, wider environment, landscape and views through its height and form, scale and proportions, materials and detailing, positioning of the buildings on site, integration of ancillary facilities and amenity of occupiers*
- *Repair the urban fabric, establish model forms of development and generate coherence and distinctiveness where the surrounding development is fragmented or of poor quality*
- *Achieve high standards of sustainability in building design, construction and use and be adaptable to future needs*
- *Support social sustainability by designing for different types of households*
- *Address the street in a positive way, to create or help reinforce sense of place, urban vitality and community safety*

Landscape and biodiversity

The key aims are for new development to:-

- *Create a robust landscape structure as an integral component at all scales of development, which follows green infrastructure and green network principles*
- *Meet the requirements of the Council's strategy for public open space and provide residential private gardens*
- *Maintain the conservation status of protected sites and species, and enhance and create new habitat*
- *Protect trees and woodland and provide new tree planting*
- *Integrate Sustainable Urban Drainage Systems into development so that their visual, landscape and biodiversity potential is maximised*
- *Ensure that hard landscape and car parking are an integral part of the overall design*

3.61 The design related response is clearly integral to the proposed development. Design development has reflected pre-application discussions and the planning policy context in accordance with the Edinburgh Design Guidance.

Summary

- 3.62 The application proposals have been assessed against the relevant material considerations.
- 3.63 The themes of the policy considered within this section reflect that of the emerging development plan, and underline the requirement for sustainable development, sensitive restoration of listed buildings and consideration of character and setting of both the conservation area and World Heritage Site, and design quality.

Conclusion

- 3.64 We have assessed the application proposals against a number of material considerations including SPP, SHEP and the emerging Local Development Plan.
- 3.65 We submit that there are no material considerations that warrant a departure from our conclusion that the application proposals are consistent with the development plan.

4.0 CONCLUSIONS

- 4.1 Montagu Evans LLP are instructed by The Royal High School Preservation Trust. This Planning Statement is submitted in support of the proposals to develop a new St Mary's Music School at the Former Royal High School.
- 4.2 The proposed development has been assessed against the development plan and have identified a number of relevant material considerations have been considered.
- 4.3 It is concluded that the proposals, subject of this application, accord with the provisions of the development plan.
- 4.4 It is concluded that there are no material considerations that warrant a departure from our conclusion based on the development plan.

Montagu Evans LLP

December 2015