

New Town & Broughton Community Council

From : Richard Price – NTBCC Planning Convenor
2 Bellevue Terrace
Edinburgh
EH7 4DU

1st April 2015

Duddingston House Properties,
For attention of Deirdre Nicholls,
Duddingston House
105 Milton Road West
Edinburgh, EH15 1RB

Dear Mr. Hare and Mr. Orr,

Reference Application No. 15/00223/PAN

CHANGE OF USE, ALTERATIONS TO AND RESTORATION OF PRINCIPAL FORMER ROYAL HIGH SCHOOL BUILDING AND PAVILIONS (ORIGINAL THOMAS HAMILTON DESIGNED SCHOOL BUILDINGS), DEMOLITION OF ANCILLARY BUILDINGS, INCLUDING THE FORMER GYMNASIUM AND GATEHOUSE, NEW BUILD DEVELOPMENT, NEW/IMPROVED PEDESTRIAN AND VEHICLE ACCESS, LANDSCAPING, PARKING AND PUBLIC REALM WORKS TO CREATE A WORLD CLASS HOTEL OF INTERNATIONAL STANDING AT NEW PARLIAMENT HOUSE, 5-7 REGENT ROAD, EDINBURGH

Representation on behalf of the New Town & Broughton Community Council.

Thank you for the opportunity presented to visit the former Old Royal High School site and buildings earlier this year; and time to discuss your initial proposals and gauge the condition of the main Thomas Hamilton building interior. Members of the New Town & Broughton Community Council (NTBCC) also took the opportunity to attend various days of the Public Exhibition / Consultation in February & March at the Old Royal High School.

The proposal outlined at the Public Exhibition is for the development of the site into a prestigious hotel. To successfully develop a hotel of this nature, it is stated that a range of associated facilities are a necessity to ensure that the development would be commercially viable and supported by the third party funding that is tentatively in place.

NTBCC are clearly supportive of a new use for the building, given its fast-deteriorating condition. It is accepted that to accommodate any new use in the listed building, change and alteration will be required. The key issue that has been raised by many bodies is whether the building and the site can accommodate the changes and the quantum of development required for a prestige hotel without detrimental impact on the building, its setting and the wider conservation area, and the Outstanding Universal Value of the World Heritage Site.

Although the premise behind the development is for conversion to hotel use, it is worth stating clearly that NTBCC's clear preference would be that a more aesthetic, educational and intellectual use could be found, befitting the Old Royal High School's history and culture, rather than develop the buildings for hotel use. In addition, these alternate uses could provide full, unfettered public access to this forgotten area of the Edinburgh World Heritage site. However, there are no concrete proposals in place for such a conversion and NTBCC fully understand that significant public funding would be required to facilitate this.

We share the Cockburn Association's assertion that a hotel is not a public building; access depends on management policies, which can change. Although the development team have put forward suggestions on how some of these aims could be achieved within the development proposed, this will not be a public building. The presumption will be that visitors will be consumers. Whilst an exclusive hotel is stated to bring significant economic benefits to Edinburgh, given an understanding of the history of how the High School, as a school serving the whole city, this is not an appropriate use for this civic asset. It is unclear what this development would bring enough to the wider Edinburgh community vs. the select few.

Again, we would restate key text from the Cockburn's submission that "Edinburgh's High School building, as a temple to learning, is the architectural pinnacle of this enlightened policy "

However, focusing on the specific proposal, the relationship of the building to its surrounding landscape is fundamental to its setting and its architectural philosophy. The former Royal High School and Calton Hill both sit within the New Town Conservation Area and the buildings within this wider landscape form a significant element of the character and appearance of the conservation area. The landscape character of Calton Hill is significant in its own right, reflected by its SSSI status and its inclusion in the New Town Gardens Historic Garden/ Designed Landscape inventory.

The relationship of the building to the landscape in many ways encapsulates the Outstanding Universal Value of The Old and New Towns of Edinburgh World Heritage Site. Alongside other classical buildings on the hill, it forms a set piece that embodies the 'Athens of the North' concept.

More specifically, comments on the key changes being proposed.

1) **Proposed Demolition of Buildings**

We accept that demolition of some of the later building additions to the site may be necessary. We could support demolition of the gymnasium building and the later single storey blocks if this facilitated a sustainable, long term future for the remaining buildings. This clearly would then provide some scope for new development within the site. The proposed demolition of the entrance lodge, whilst not original, is regretted. It makes a significant contribution to the vista at the foot of the access road to Calton Hill. We believe that new uses could be found for this building preserving the viewpoint from Waterloo Place towards Calton Hill – either by being incorporated into a new development or a separate, standalone function - perhaps as Calton Hill Visitor's Reception / Interpretation area – a facility whose need is acknowledged and supported in your proposal.

We do not fully support the view expressed by other stakeholders that the loss of ancillary listed buildings is "*more contentious and (their) loss could only be considered where the benefits of the wider scheme outweighed the disbenefits of (their) loss.*" We do however question whether there has been adequate demonstration as to how the proposed demolitions would be justified in relation to the SHEP tests, which states that "There is, therefore, a presumption against demolition or other works that adversely affect the special interest of a listed building or its setting" and although we acknowledge that Listed buildings will from time to time require alteration and adaptation if they are to remain in beneficial use, we do not believe that this building will be at risk if such alteration and adaptation is unduly constrained.

2) **Alterations**

Regarding the proposed interventions to the listed building, NTBCC accept that alterations will be required for any new use but these should be sensitive, sympathetic and above all necessary. Clearly the building(s) will need to evolve and change and it is recognised that some of the interventions would be necessary to improve connectivity both within and external to the building(s) consistent with the new use, including that of a hotel. However, many of the alterations seek to undermine the fundamental architectural philosophy of the building. We support the Cockburn's position that "The beauty of the building lies in the fact that Hamilton successfully adapted the windowless Greek Temple model to a school use. By attempting to impose the requirements of the prestige hotel on the front of the building, such as a grand staircase, window and door openings and conservatories, is to ignore why the building is recognised as Scotland's finest example of Greek Revival architecture."

The proposed windows in the portico appear to be fundamental to the concept of the hotel foyer and a spectacular arrivals space for hotel guests. We could not support this intervention for the reasons stated above. This would also imply, inevitably, some kind of safety railings which would inevitably spawn chairs, tables and with other associated hotel paraphernalia., all beyond any planning control. Again, we support the Cockburn's position, "Rather than hotel guests enjoying the view, they would be the view, and centre stage. These issues are irreconcilable."

3) **Scale of Development**

As a consequence of the proposed demolition to the listed buildings, the scheme involves new development within the site, consistent with the aims of creating a prestigious hotel. It is our understanding that the commercial viability of the hotel development has, as a key requirement, a minimum floor space that has been set arguably above the maximum that the current site can support. Therefore, despite various options being explored as to how best to fit the necessary scale within the site, for example – by a higher building on the eastern terrace, we remain firmly of the opinion that the quantum of development required by a hotel of this nature cannot be accommodated on the site in a manner that achieves an acceptable setting in this location. The site is not large for a development of this nature and the location for any new development is restricted with no scope to push development significantly back from the listed building. The new development remains too visible within the site context, the setting, landscape, architectural composition of the listed building and key views. In summary, the proposal is not respectful of the listed building and, as such, is both unviable and unacceptable.

We note and support Historic Scotland's view that the western terrace should remain undeveloped so as to afford a side view of Hamilton's building. The current proposal for the development on the western terrace as presented at the March Public Exhibition destroys the view of the Royal High School site and Calton Hill and, in our view, severely compromises the current spatial arrangement between all of these buildings, including St Andrews' House to the south.

4) **Proposed Justification**

NTBCC acknowledge that a key benefit of the proposal (and its primary justification ?) is in preventing further damage to the existing buildings from less than adequate maintenance over the past few decades. However, the City of Edinburgh Council has historically demonstrated with other important public buildings that this can be prevented by applying their existing enforcement process for Listed Buildings. We would argue that at this time, this is not an effective process and not only does CEC not always enforce this on others appropriately, it would also seem to fail to meet its own standards and maintain its buildings such as this one in a reasonable state of good repair.

We therefore do not accept the primary justification for accepting this scheme. We would acknowledge however that developing alternates, obtaining the necessary funding in a timely manner would be challenging and we regret that no such initiatives are currently being progressed.....

5) **Sustainability**

We note that the proposal is for a high end or "6* hotel"- however, from a planning perspective, it is not possible to guarantee that this would be the case even by applying strenuous conditions. In actuality, the permission if granted would cover Hotel and Hostel use (Class 7). There is no guarantee, nor could one be given by anyone involved that the operator will be a 6* hotel either initially or in the longer term. In addition, as stated by the Cockburn, "the notion that the site could accommodate hotel use has been untested in capacity terms until now." NTBCC's concern therefore would be that either the commercial viability of the proposed hotel is not achieved either due to higher initial costs or longer term changes in the economic environment, by which time, the buildings have been modified or demolished with (in our view) inappropriate additions but a longer term, sustainable use for the remaining buildings has not been achieved. This again leads NTBCC to not support the proposed, irreversible changes.

In summary, NTBCC is deeply concerned that the proposal for the site to accommodate a prestige hotel, of the scale which you have specified and presented so far, will have a detrimental impact on the special architectural and historic interest in the listed building from the combined and cumulative impacts of both the alterations to the listed building and the new development.

NTBCC believe that the quantum of development which the building and site can accommodate without detrimental impact on the building, its setting and the wider conservation area and World Heritage Site is significantly less than the proposed development.

We are however encouraged that the proposal has spawned a useful and overdue debate and discussion in the wider community on how best to safeguard the building. The process has also encouraged various options to be suggested both for the building and the wider context of revitalising and reenergising this forgotten part of the city centre including Calton Hill.

NTBCC would be happy to discuss further with you if that would be helpful and will contact you separately regarding this.

Yours faithfully

Richard Price on behalf of the New Town & Broughton Community Council

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Joseph Taylor for the Cockburn Association

Euan Leitch for the Architectural Heritage Society for Scotland

Adam Wilkinson for Edinburgh World Heritage